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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

CAMPBELL STEM PRESERVATION)
& EDUCATION FOUNDATION,)
ALASKA CORPORATION,)

Plaintiff,)

v.)

ANCHORAGE SCHOOL DISTRICT)
and ANCHORAGE SCHOOL BOARD,)

Defendants.)

Case No. 3AN-26-06081 CI

**EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION AND LIMITED EXPEDITED DISCOVERY**

EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION AND LIMITED EXPEDITED DISCOVERY

Plaintiffs respectfully move this Court, pursuant to Alaska law and the Alaska Rules of Civil Procedure, for issuance of a Temporary Restraining Order (“TRO”), the scheduling of a Preliminary Injunction Hearing, and an Order permitting Limited Expedited Discovery to preserve the status quo and prevent imminent and irreparable harm arising from the Anchorage School District’s decision to close Campbell STEM Elementary School. See Alaska R. Civ. P. 65(a)–(b); Alaska R. Civ. P. 26(d).

INTRODUCTION

Absent immediate injunctive relief, Defendants are actively implementing the closure of Campbell STEM Elementary School on a compressed timeline that effectively forecloses meaningful review, deprives Plaintiffs and the public of due process, and irreversibly dismantles a unique, nationally certified STEM educational program. Based on the District’s established practices and the timeline already set in motion, these actions include implementing the challenged closure decision. Specifically, the District has initiated the reassignment of school leadership and other personnel, and has begun procuring materials necessary for the physical transfer of school property and equipment, confirming that implementation of the closure is already underway and progressing toward completion.

These actions are not preliminary or speculative; they constitute active steps toward dismantling the existing school structure and redistributing its operations. The initiation of

these measures demonstrates that the closure process is already in motion and will continue absent immediate judicial intervention.

Defendants have already initiated implementation of the closure decision. This is not mere planning, it is execution. Each step further entrenches the closure, disrupts existing educational relationships, and compounds harm in ways that cannot be reversed after the fact.

As these actions continue, staff assignments will be altered, program resources will be redistributed, and the operational structure of Campbell STEM will begin to dissolve. Once these processes advance, restoring the status quo becomes increasingly impracticable, if not impossible. Courts routinely recognize that the loss of a unique educational program, disruption to students' established learning environments, and deprivation of procedural protections constitute irreparable harm not compensable by monetary damages.

Moreover, the accelerated implementation timeline ensures that Plaintiffs will be deprived of any meaningful opportunity to challenge the decision before its effects are fully realized. The decision itself was advanced under conditions that limited public participation, constrained evaluation of reasonable alternatives, and failed to adequately consider program-specific impacts, including the significance of Campbell's nationally certified STEM designation.

Without immediate judicial intervention, the closure will move from decision to full execution before judicial review can occur, rendering any subsequent relief ineffective. A Temporary Restraining Order is therefore necessary to preserve the status quo, prevent further implementation actions, and ensure that the Court retains the ability to provide meaningful relief.

Alaska courts recognize that injunctive relief is warranted where a party demonstrates irreparable harm, serious and substantial questions going to the merits, that the balance of hardships tips in their favor, and that the public interest supports relief. *See Ostrow v Higgins*, 722, P.2d 936 (Alaska 1986). Each of these factors strongly favors Plaintiffs here.

The closure of Campbell STEM Elementary will result in immediate and irreparable harm that cannot be remedied after the fact, including the loss of a specialized academic program, disruption to students and families, and the dismantling of an established educational ecosystem supported by nearly 100 community and business partners. Once implemented, the status quo cannot be restored without substantial cost and disruption, rendering any later relief ineffective as a matter of law.

Moreover, Defendants' actions raise serious questions regarding compliance with procedural due process requirements, public notice obligations, and the lawful exercise of discretion in the disposition of public educational resources. Without expedited discovery under Alaska R. Civ. P. 26(d), Plaintiffs will be further prejudiced in their ability to obtain critical information necessary to fully present these claims before irreversible actions occur.

Accordingly, Plaintiffs respectfully request that this Court issue an immediate Temporary Restraining Order under Rule 65(b) to halt further implementation of the closure, grant a Preliminary Injunction Hearing under Rule 65(a), and authorize limited expedited discovery to ensure a fair and informed adjudication on the merits before irreparable harm occurs.

FACTUAL BACKGROUND

Prior School Closure Recommendations

On October 18, 2022, the Anchorage School District ("ASD") identified a defined group of schools for potential closure, including Abbott Loop Elementary, Birchwood ABC Elementary, Klatt Elementary, Nunaka Valley Elementary, Northwood Elementary, and Wonder Park Elementary. ASD and the School Board held numerous opportunities for public engagement with town halls and meetings over 62 days and on December 19, 2022, the Anchorage School Board approved the closure of Abbott Loop Elementary (Exhibit A; Timeline Rightsizing Initiatives).

On November 4, 2024, ASD published a district-wide elementary school evaluation rubric and, based on that rubric, recommended a multi-year closure plan identifying Baxter Elementary, Bear Valley Elementary, Fire Lake Elementary, Lake Hood Elementary, Nunaka Valley Elementary, Tudor Elementary, and Wonder Park Elementary as closure candidates. Campbell STEM Elementary School ("Campbell STEM") was not included among the identified schools. To the contrary, under ASD's own normalized quintile rankings, Campbell STEM fell well outside the group prioritized for closure (Exhibit B; ASD Rightsizing Presentation Nov 3, 2024). ASD and the School Board held numerous opportunities for public engagement with town halls and meetings over 43 days and on December 17, 2024 voted to close Lake Hood Elementary and Nunaka Valley Elementary (Exhibit A; Timeline Rightsizing Initiatives).

On October 6, 2025, ASD again identified schools for potential closure, including Fire Lake Elementary and Lake Otis Elementary. ASD and the School Board again held numerous opportunities for public engagement with town halls and meetings over 43 days and the

School Board ultimately voted not to close either school (Exhibit A; Timeline Rightsizing Initiatives).

Thus, across multiple formal evaluation processes spanning 2022 through 2025, ASD repeatedly identified specific schools for closure consideration. Campbell STEM was not among them. Additionally, ASD administration and the Anchorage School Board offered numerous town hall style opportunities and regular school board meetings with ample notice for public testimony.

Notice of Closure Consideration and Limited Public Participation

On February 9, 2026, the School Board adopted Resolution #25-26-01(S.1), directing ASD to identify consolidation and efficiency measures, with analysis due by February 14, 2026 (Exhibit C; ASD Resolution #25-26-01(S.1)).

Four days later, on February 13, 2026, at approximately 3:30 p.m., ASD issued Memorandum #137 identifying Fire Lake Elementary, Lake Otis Elementary, and Campbell STEM (previously absent from all prior closure recommendations) as a candidate for closure (Exhibit D; ASD Rightsizing Email). The notice was issued late on a Friday immediately preceding a three-day federal holiday weekend.

The next opportunity for public participation occurred on the February 17, 2026, School Board meeting. Members of the public were required to register for testimony by 11:59 p.m. on February 16, 2026. As a practical matter, ASD provided no proposal for review, or the ability to obtain information, and prepared a response.

At the February 17 meeting, public testimony was limited to two minutes per speaker and occurred from approximately 7:30 p.m. until midnight. None of the public speakers were in favor of closing Campbell (Exhibit E; February 17 Board Minutes).

On or about February 24, 2026, the School Board voted 4–3 to close Campbell STEM, approximately six business days after the school was first publicly identified as a closure candidate (Exhibit F; ASD Memorandum #137). The record reflects that no public testimony presented on February 17, 2026, or among the limited testimony, approximately four speakers, on February 24, 2026, supported the closure of Campbell STEM.

The decision to close Campbell STEM was made just six business days after initial notice, on a significantly compressed timeline. Numerous stakeholders, including members of the public, ASD administration, School Board members, and Anchorage Assembly members—raised concerns regarding the short timeline to evaluate schools for

consolidation, engage the public, and assess the ramifications of closing Campbell STEM. Multiple School Board Members and Anchorage Assembly members publicly expressed concern regarding both the pace of the process and the adequacy of community engagement (Exhibit G; Entirety). Board Member Donley raised numerous objections to the legality of the process and at the March 17, 2026 meeting asked District Superintendent Dr. Jharrett Bryantt whether he had received a written legal opinion to which Dr. Bryantt said no (Exhibit G; Meeting 4 [00:18:53]). This accelerated process raises substantial due process concerns, particularly given evidence suggesting the decision may have been effectively predetermined prior to the formal vote and that critical information was withheld from decision-makers.

Acknowledgment of Incomplete Evaluation

The timeline surrounding the closure of Campbell STEM reflects an unusually compressed and irregular process for notice, analysis, and public engagement. District officials have publicly acknowledged that the analysis supporting the recommendation was conducted within approximately three to four business days (Exhibit H; Entirety), an interval far shorter than the evaluation periods applied to other schools in prior closure considerations.

Critically, ASD leadership acknowledged during public proceedings that no comprehensive district-wide evaluation had been conducted prior to the closure recommendation (Exhibit H; Entirety). ASD Administrators were asked numerous questions from the School Board about whether various analyses were conducted to which the Administration replied they did not have time (Exhibit H; Meetings 2-4).

On March 17, 2026, during public testimony before the School Board, it was disclosed for the first time that additional public funding had been allocated to or associated with Campbell STEM. During that same proceeding, School Board Members Dave Donley and Pat Higgins publicly acknowledged that they were not aware of this funding information at the time of the closure vote (Exhibit G; Meeting 4 [02:40:30] and [02:42:21]). Both members moved to rescind action on the closure of Campbell STEM to allow review of this newly disclosed information, which had not been included in the administration's report or presented to the Board prior to the vote. The vote to rescind action on the closure of Campbell STEM failed 3-3 (Exhibit I; 3/17 School Board Minutes).

Absence of Transparent Criteria and Methodology

ASD has not publicly produced documentation identifying the criteria, scoring methodology, or comparative framework used to evaluate schools or select Campbell STEM

for closure. Unlike prior closure processes, where defined rubrics and rankings were applied, no consistent or discernible standard has been articulated here (Exhibit K; Meeting 3 [01:54:32]; Meeting 4 [04:58:00]). What has been revealed indicates that the decision was made based on incomplete and materially inaccurate information. ASD Administrators described relying on previous rightsizing analysis for selecting consolidation schools (Exhibit H). However, as demonstrated previously, Campbell STEM was never on a list for potential closure and the only publicly available scoring matrix for closure showed Campbell STEM well below numerous other schools.

One of the primary reasons articulated for selecting Campbell STEM was the condition of the building (Exhibit J; Meeting 1 [01:18:49]; Meeting 2 [00:46:49]; Meeting 3 [02:06:35]; Meeting 5 [04:13:12]), despite a 2025 school bond package passed by voters that included \$11.48 million dollars for the remodel of Campbell STEM. At the February 17 meeting, Board Member Higgins noted that the average deferred maintenance across all ASD buildings is approximately \$11-12 million (Exhibit K; Meeting 1 [00:57:25]). ASD administrative officials made several misleading statements to the Anchorage School Board and Anchorage Assembly regarding the condition of the Campbell STEM building. Sven Gustafson stated at the February 17, 2026 work session that Campbell STEM had closed for five days due to facility issues, including heating problems and frozen sewer lines (Exhibit J; Meeting 1 [01:18:49]). Dr. Bryantt reiterated this claim to the Anchorage Assembly on March 24, 2026, asserting that the sewer problem was not covered by the current bond funding for Campbell STEM (Exhibit J; Meeting 5 [04:13:12]). In fact, the school was closed for four days, not five. Furthermore, the sewer freezing occurred in the municipal sewer lines, which caused a backup into the school. This issue was not attributable to the building itself and could have occurred at any location. During the same March 24 remarks, Dr. Bryantt also stated that the roof was leaking during his last visit to the school (Exhibit J; Meeting 5 [04:13:12]). While technically true, he omitted the crucial context: the leak was in a small section of the building scheduled for remodel during the summer of 2026 under the already approved bond funds, and therefore had not yet received the roof replacement that occurred in 2025. The claim that the building was generally in poor condition is therefore misleading and incomplete.

The final reason given by the administration for the selection of Campbell STEM is the ability to recover \$2.2 million in one time funds from prior school bond debt reimbursement money that can be applied elsewhere (Exhibit J; Meeting 1 [01:18:49]; Meeting 2 [00:46:49]; Meeting 3 [01:50:40]; Meeting 5 [04:13:12]). While this is true, it does not constitute a robust decision making process for something as permanent and lasting as a school closure. In contrast to prior years, where ASD relied on articulated metrics and

comparative rankings, the selection of Campbell STEM appears to have been driven by undisclosed considerations, incomplete data, lack of public discussion and post hoc justifications rather than a transparent, consistently applied methodology.

Lack of Information Regarding STEM Certification Requirements

During public proceedings, it was demonstrated that ASD administration and members of the School Board lacked detailed information regarding the requirements, costs, and processes necessary to obtain and maintain Campbell STEM's national STEM certification. No documentation has been produced indicating that these factors were analyzed or incorporated into the closure evaluations or recommendation. (Exhibit K; Meeting 2 [00:29:58], [01:34:45], [01:42:28]; Meeting 4 [03:43:34], [03:43:34], [04:58:00]).

Defendants similarly failed to evaluate the programmatic requirements necessary to preserve Campbell STEM's nationally certified STEM designation, including associated staffing, operational, and financial components.

Collectively, these omissions demonstrate that the decision to close Campbell STEM was made without the foundational analysis necessary to assess feasibility, cost, legal obligations, or programmatic impact. Moreover, Defendants failed to evaluate Campbell STEM as a specialized, nationally certified program in comparison to similarly situated schools, instead treating it as interchangeable with traditional elementary schools. This resulted in an analysis grounded in a false premise, rendering the decision arbitrary, capricious, and unsupported by an adequate administrative record.

About Campbell STEM Elementary School

Campbell STEM Elementary School is a specialized academic program centered on **Science, Technology, Engineering, and Mathematics (STEM)**, utilizing an interdisciplinary, project-based learning model that integrates these subjects into real-world applications. Unlike traditional elementary instruction, STEM education emphasizes hands-on problem solving, collaboration, and applied learning environments.

Campbell STEM has developed substantial, long-standing partnerships with local businesses and community organizations that provide direct support for STEM programming, funding, and project-based learning opportunities. These partnerships are integral to the school's educational model and contribute directly to its designation as the only nationally certified STEM elementary program in the State of Alaska, a designation achieved after years of development, investment, and program alignment

In addition, Campbell's proximity to and integration with adjacent Wolverine Park—utilized as a functional STEM learning environment ("STEM Park"), extends instruction beyond the classroom and provides applied, experiential learning opportunities not replicated at other schools within the District.

Further distinguishing the program, Campbell STEM hosts a satellite location of FabLab, an organization originating from the Massachusetts Institute of Technology (MIT) Media Lab. This is the only FabLab presence in the State of Alaska, providing students with direct access to advanced fabrication technologies and innovation-based learning experiences. (*Campbell.asdk12.org/about-us/stem-standard-2*)

As noted by Assembly Member Erin Baldwin Day during public remarks on March 20, 2026, Campbell STEM functions as Anchorage's only science immersion elementary program, further underscoring its unique role within the District's educational offerings.

Defendants' assertion of approximately \$900,000 in projected cost savings is unsupported and misleading, as it is premised on an incomplete and materially deficient financial analysis. The District failed to account for significant, foreseeable offsetting costs, including: (1) the need for at least two additional school buses to transport displaced students; (2) the logistical costs of relocating school assets, equipment, and instructional materials.

When these unaccounted-for expenses are considered, the purported "savings" are not savings at all, but rather speculative figures lacking any reliable evidentiary basis. The omission of these material cost factors renders the financial justification arbitrary and capricious. *See Laidlaw Transit, Inc. v. Anchorage School District, 118 P.3d 1018, 1025 (Alaska 2005).*

Because Defendants failed to perform a complete cost-benefit analysis incorporating both projected savings and foreseeable expenditures, the closure decision lacks a rational basis and cannot withstand judicial scrutiny.

STANDARDS FOR INJUNCTION RELIEF

A Temporary Restraining Order and Preliminary Injunction are extraordinary remedies designed to preserve the status quo and prevent irreparable harm pending final adjudication. Alaska courts recognize two alternative standards under which such relief may be granted: (1) the “probable success on the merits” standard and (2) the “balance of hardships” standard. *See A.J. Industries, Inc. v. Alaska Public Service Comm’n*, 470 P.2d 537, 540 (Alaska 1970).

Under the probable success on the merits standard, a plaintiff must make a clear showing that it is likely to succeed on the merits of the underlying claims. Where such a showing is made, injunctive relief is appropriate to prevent imminent harm and preserve the Court’s ability to render meaningful relief.

Under the balance of hardships standard, preliminary relief is warranted where:

1. The plaintiff faces immediate and irreparable harm in the absence of relief;
2. The opposing party can be adequately protected during the pendency of the injunction; and
3. The plaintiff raises serious and substantial questions going to the merits of the case.

These standards are applied on a sliding scale. A stronger showing of probable success on the merits reduces the weight required on the balance of hardships, while a showing that the balance of hardships tips sharply in favor of the plaintiff permits relief upon a lesser showing of likelihood of success, so long as substantial questions are presented.

The purpose of preliminary injunctive relief is to maintain the status quo and prevent irreparable harm before a full adjudication on the merits can occur. *See State v. Kluti Kaah Native Village of Copper Center*, 831 P.2d 1270, 1273 (Alaska 1992). Irreparable harm includes injuries that cannot be adequately remedied by monetary damages, including the loss of statutory rights, the denial of meaningful public participation, and the irreversible consequences of unlawful governmental action.

Alaska courts have also recognized that decisions affecting the operation or closure of public schools must comply with governing law and are subject to judicial review where procedural or statutory violations are alleged. *See Tunley v. Municipality of Anchorage School District*, 631 P.2d 67 (Alaska 1981)

In evaluating requests for injunctive relief, courts further consider the public interest, particularly where governmental action affects students, families, and the broader community. Preservation of lawful process, transparency, and public trust weighs strongly in favor of injunctive relief where procedural deficiencies are present.

Here, Plaintiffs satisfy both standards. The record reflects substantial questions and a strong likelihood of success on the merits, including violations of Alaska's Open Meetings Act, deficiencies in notice, and the failure to consider material financial and programmatic information, including voter-approved funding associated with Campbell STEM Elementary School. Plaintiffs also face immediate and irreparable harm, including the loss of a unique, nationally certified STEM program, disruption to students and families, and irreversible consequences stemming from a procedurally defective closure decision. The balance of hardships tips sharply in Plaintiffs' favor, as maintaining the status quo imposes minimal burden on Defendants while preventing permanent harm to Plaintiffs and the public.

LIKELIHOOD OF SUCCESS ON THE MERITS

Plaintiff satisfies both standards for injunctive relief under Alaska Civil Rule 65, demonstrating a likelihood of success on the merits and irreparable harm, and, alternatively, raising serious and substantial questions with the balance of hardships tipping sharply in Plaintiff's favor. Here, Defendants failed to provide meaningful notice or opportunity for public participation. Notice identifying Campbell STEM as a closure candidate was issued on Friday, February 13, 2026, immediately preceding a three-day federal holiday weekend. The Board proceeded to a final vote on February 24, 2026, allowing only a compressed window for public review and response.

A. Violation of the Alaska Open Meetings Act and Deficient Administrative Record

The Alaska Open Meetings Act, AS 44.62.310, requires that meetings of governmental bodies be conducted openly and that reasonable notice be provided to allow for meaningful public participation. The Court has repeatedly emphasized that the purpose of the Act is to ensure that the public's business is conducted openly and that citizens are afforded a meaningful opportunity to observe and participate in governmental decision-making.

See Tunley v. Municipality of Anchorage School District, 631 P.2d 67 (Alaska 1981); see also Hickel v. Southeast Conference, 868 P.2d 919 (Alaska 1994)

Tunley is particularly instructive, appreciating there the Court specifically addressed school closure decisions and underscored that meaningful notice and participation are fundamental components of lawful school board action. In Tunley, the Court determined that five days between the recommendation that schools be closed and the date of public comment was not sufficient time for appropriate preparation of opposition concerning an issue of that complexity and importance. The same is true here given the six intervening business days even in light of the ten day requirement by law (*see 4 AAC 05.090*).

The notice was issued on February 13, 2026, late on a Friday immediately preceding a three-day federal holiday weekend. It did not provide a meaningful opportunity for public review or participation. Public testimony occurred only days later, and the Board voted approximately six business days after the initial notice.

Given the significance of a school closure decision, this compressed timeline was not reasonable and functionally deprived stakeholders of the ability to review information, assess impacts, or prepare informed testimony. The procedural deficiencies were compounded by a materially incomplete administrative record.

During the March 17, 2026 public meeting, it was disclosed that additional public funding was associated with Campbell STEM—information that had not been provided to the Board prior to its vote. Board Members Dave Donley and Pat Higgins expressly acknowledged they were unaware of this information and moved to delay or reconsider the decision to allow proper review (Exhibit G; Meeting 4 [02:40:30] and [02:42:21]). Their request was rejected.

This omission is not minor. Financial considerations are central to any closure analysis and directly affect comparative evaluation across schools. The failure to provide this information deprived the Board of the ability to make a fully informed decision.

The record further demonstrates that neither ASD administration nor the School Board possessed or considered critical information regarding the requirements, costs, and process necessary to obtain and maintain Campbell STEM's national STEM certification. This certification represents a multi-year investment and is a defining characteristic that distinguishes the school from all others in Alaska.

The failure to evaluate both (1) material financial inputs and (2) the school's unique statewide programmatic designation confirms that the decision was made on an incomplete and materially deficient record.

Under Alaska law, administrative decisions must be based on a complete and adequately developed record. Where material information is omitted, the resulting action is arbitrary, capricious, and an abuse of discretion.

B. Arbitrary and Capricious Administrative Action

Administrative decisions by governmental entities must be supported by a rational basis and an adequate administrative record. *See Laidlaw Transit, Inc. v. Anchorage School District, 118 P.3d 1018, 1025 (Alaska 2005)*. Here, the record reflects that the closure decision lacks the hallmarks of reasoned decision-making.

ASD has not produced:

- any scoring methodology;
- any comparative ranking of schools;
- any documented weighting of decision factors;
- any analysis incorporating Campbell STEM's unique designation;
- any evidence of a complete district-wide evaluation.

Additionally, district representatives acknowledged during public proceedings that a comprehensive evaluation of all district facilities had not been completed prior to recommending closures.

Where a governmental decision lacks such an identifiable analytical framework or supporting administrative record, courts may determine that the action is arbitrary or capricious. The combination of:

- incomplete financial data,
- failure to evaluate a defining program, and
- absence of a documented methodology

renders the decision legally deficient under Alaska law.

C. Procedural Due Process

The United States Supreme Court has established that when government action affects important interests, individuals must receive meaningful procedural protections. *Mathews v. Eldridge*, 424 U.S. 319 (1976); *Goldberg v. Kelly*, 397 U.S. 254 (1970)

Parents, students, and community members affected by the closure were provided only a limited opportunity to review the proposal or challenge the analytical basis used to select Campbell STEM. Because the District failed to disclose the evaluation framework, affected stakeholders were unable to meaningfully respond to or contest the decision. The combination of inadequate notice, compressed timelines, and the absence of disclosed decision criteria created a substantial risk of erroneous decision-making and deprived Plaintiffs of meaningful participation. *See Mathews*, 424 U.S. at 335.

Under *Laidlaw Transit, Inc. v. Anchorage School District*, 118 P.3d 1018, 1025 (Alaska 2005), administrative decisions must be supported by a rational basis and an adequate record. That standard is not met. ASD produced no scoring methodology, no comparative rankings, no weighting of factors, no analysis of Campbell STEM's unique designation, and no evidence of a complete district-wide evaluation. District representatives further acknowledged that a comprehensive evaluation was not completed. This absence of an identifiable analytical framework, combined with incomplete financial data and the failure to evaluate a defining a specialized program, renders the decision arbitrary and capricious.

Plaintiffs are therefore likely to prevail on the merits because the District's decision is both procedurally deficient and unsupported by a rational, evidence-based administrative record.

Moreover, absent immediate injunctive relief under Rule 65(b), Plaintiffs will suffer irreparable harm. The continued implementation of the closure will result in the irreversible transfer, loss, or misallocation of program-specific assets, including those subject to donor restrictions and partnership agreements. Once dispersed, these assets cannot be readily recovered, reconstructed, or restored to their original programmatic use. This loss, combined with the disruption of an established, nationally certified STEM program and the denial of meaningful process, cannot be remedied through monetary damages or post hoc relief, rendering any subsequent judicial review ineffective.

IRREPARABLE HARM

The closure of Campbell STEM Elementary School will cause immediate and irreparable harm to students, families, and the broader community. Campbell STEM is the only nationally certified STEM elementary program in Alaska. That certification represents years of development, institutional investment, and program design. Once dismantled, the program cannot be readily restored

Closure will result in:

- loss of a unique educational program;
- disruption of specialized curriculum and instruction;
- reassignment of trained staff;
- displacement of students from a specialized learning environment;
- loss of certification and program continuity.

Loss of a Unique Educational Program

Once a school program is dismantled and students are redistributed, the educational structure cannot be easily reconstructed—even if the decision is later reversed.

The loss of a program supported by specialized national certification, voter-approved capital investment, and an extensive network of nearly 100 community and business partners underscores the permanent and non-recoverable nature of the harm, as this integrated educational ecosystem cannot be reconstructed once dismantled.

Disruption and Displacement

The selection of Campbell STEM for closure has already begun to destabilize these partnerships, introducing uncertainty that directly impacts continued participation by community and business stakeholders. Such disruption is not theoretical—once institutional trust and engagement are compromised, these relationships cannot be readily restored, further compounding the permanent and irreparable nature of the harm.

The imminent removal and potential redistribution or disposal of program assets—some of which may be subject to third-party ownership or use restrictions—creates a substantial risk of permanent loss, contractual breach, and inability to restore the program if Plaintiffs prevail.

Once bond funds allocated to Campbell STEM are redirected or encumbered for other projects, those resources cannot be readily restored, permanently impairing the ability to preserve or reinstate the program. This financial displacement constitutes irreparable harm independent of the educational and community impacts.

Impact to Children

The closure of Campbell STEM will cause immediate and irreparable harm to students with disabilities, including those receiving services under the Individuals with Disabilities Education Act ("IDEA"), Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act ("ADA").

Under federal law, these students are entitled to a Free Appropriate Public Education (“FAPE”), delivered in conformity with an individualized education program and, to the maximum extent appropriate, in the least restrictive environment. *See* 20 U.S.C. § 1400(d)(1)(A); 20 U.S.C. § 1412(a)(1), (5); 34 C.F.R. §§ 300.101, 300.114. Section 504 and the ADA similarly prohibit discrimination and require the provision of appropriate educational services and accommodations to ensure equal access. *See* 29 U.S.C. § 794; 34 C.F.R. Part 104; 42 U.S.C. § 12132.

The forced displacement of students from Campbell STEM will disrupt established educational placements, service providers, and support systems that are specifically tailored to each student’s needs. Such disruption creates a substantial risk of interruption, degradation, or delay in the delivery of required services, particularly where the District has not provided a detailed, individualized transition plan demonstrating how services will be maintained without interruption at receiving schools.

Courts have consistently recognized that the loss or disruption of special education services constitutes irreparable harm. *See Honig v. Doe*, 484 U.S. 305, 327 (1988) (recognizing the importance of maintaining stability in educational placement for students with disabilities); *Burlington Sch. Comm. v. Dep’t of Educ.*, 471 U.S. 359, 373–74 (1985) (emphasizing the centrality of appropriate placement and services under IDEA); *Ms. S. v. Vashon Island Sch. Dist.*, 337 F.3d 1115, 1133–34 (9th Cir. 2003) (holding that the denial of appropriate educational services constitutes irreparable harm); also *N.D. v. Hawaii Dep’t of Educ.*, 600 F.3d 1104, 1112–13 (9th Cir. 2010) (recognizing that systemic disruptions to educational services can support injunctive relief).

The Ninth Circuit has further recognized that interference with statutorily guaranteed educational rights, including those under IDEA and related statutes, supports a finding of irreparable harm where students face disruption to services and educational continuity. *See Enyart v. Nat’l Conf. of Bar Exam’rs*, 630 F.3d 1153, 1165–66 (9th Cir. 2011) (holding that denial of rights under the ADA constitutes irreparable harm).

Absent injunctive relief, these harms cannot be adequately remedied after the fact. Educational regression, disruption of individualized supports, and loss of continuity in services are not compensable through monetary damages and cannot be fully restored once lost.

EMERGENCY INJUNCTION AND TRO

Plaintiffs satisfy all requirements for issuance of a Temporary Restraining Order and Preliminary Injunction. A party seeking injunctive relief must demonstrate: (1) likelihood of success on the merits, (2) irreparable harm, (3) that the balance of equities favors relief, and (4) that an injunction is in the public interest. See *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008).

First, Plaintiffs are likely to succeed on the merits. As set forth above, Defendants' decision to close Campbell STEM is arbitrary and capricious, unsupported by an adequate administrative record, and procedurally deficient. Defendants failed to conduct a reasoned evaluation, relied on an incomplete record, and proceeded on a false premise by treating a specialized, nationally certified STEM program as interchangeable with traditional elementary schools.

Second, Plaintiffs will suffer irreparable harm absent immediate relief. Defendants are actively implementing the closure on a compressed timeline, including the reassignment of personnel, redistribution of students, and procurement of materials for the transfer of program assets. Once implemented, the dismantling of Campbell STEM's unique program, partnerships, and donor-restricted resources cannot be reversed or remedied through monetary damages. This harm is immediate, ongoing, and permanent.

Third, the balance of equities strongly favors injunctive relief. Preserving the status quo pending judicial review imposes minimal burden on Defendants, while denial of relief would result in the permanent loss of a unique, statewide educational program and the irreversible disruption of students, families, and community partnerships.

Fourth, an injunction is in the public interest. The public has a compelling interest in lawful, transparent, and reasoned decision-making by governmental entities. That interest is heightened where, as here, the decision affects a unique, nationally certified STEM program that cannot be replicated within the District. Preventing the premature dismantling of such a program ensures that decisions of this magnitude are made based on a complete record and in compliance with established legal standards.

Moreover, the requirements of Rule 65(b) are independently satisfied. Immediate and irreparable injury will occur before full adjudication can be had, as Defendants' ongoing implementation will result in the irreversible loss of program assets, structure, and function within days. Absent immediate relief, the Court's ability to provide meaningful review will be effectively extinguished.

Accordingly, Plaintiffs respectfully request that the Court issue a Temporary Restraining Order to preserve the status quo and prevent irreparable harm pending further proceedings.

CONCLUSION

For the foregoing reasons, Plaintiffs have demonstrated a clear likelihood of success on the merits, or at minimum, the existence of serious and substantial questions going to the merits of this case. Plaintiffs have further established that they will suffer immediate and irreparable harm absent injunctive relief.

The harm at issue is not merely the closure of a neighborhood school—it is the dismantling of a highly specialized, nationally recognized STEM program that cannot be replicated through reassignment or redistribution of students. Campbell STEM represents years of deliberate development, including integrated curriculum design, trained instructional staff, established industry partnerships, and formal certification. These elements are not transferable and cannot be recreated within any reasonable timeframe. Once disrupted, they are effectively lost.

The certification process for Campbell STEM took 5-8 years. If the school is closed and if the Defendants were to start a new program this fall, it would not be ready until 2031-2034. Any parent of a STEM-fascinated child would not have any similar opportunity of STEM specialization for the remainder of their child's elementary school track.

This harm is further compounded by the program's demonstrated success. Campbell STEM reflects strong student enrollment, academic performance, and attendance when compared to similarly situated schools. These metrics are not incidentally direct indicators of program effectiveness and demand. Eliminating a high-performing and sought-after program, without a comparable alternative, constitutes a clear and irreparable loss to students and the community.

Plaintiffs do not oppose school closures or consolidation when such decisions are grounded in a complete, transparent, and fact-based process. However, the record here reflects the opposite. The decision at issue was made under a severely compressed timeline, without full evaluation of all schools, without meaningful consideration of the unique structure and performance of the STEM program, and without the application of consistent or clearly defined criteria. By Defendants' own acknowledgment, there was insufficient time to conduct a complete and informed analysis, rendering the resulting decision inherently unreliable.

The record further raises substantial concerns regarding the reliability of the data used to justify closure. The District retains control over student admissions and capacity utilization, including the authority to limit or decline additional enrollment. To the extent such limitations were imposed, enrollment figures cannot be treated as neutral indicators of program demand or viability. At minimum, this underscores the incomplete and potentially misleading nature of the information provided upon by Defendants and further supports Plaintiffs' claim that the decision was made without full and accurate knowledge of the program.

Additionally, the District has acknowledged that financial considerations, including the pursuit of approximately \$2.2 million in State of Alaska school bond debt reimbursement, were a motivating factor in the closure decision. While financial considerations may be relevant, they do not excuse the failure to conduct a thorough, reasoned, and fact-based evaluation, particularly where the result is the elimination of a uniquely successful and non-replicable academic program.

The balance of equities weighs decisively in favor of Plaintiffs. The requested relief preserves the status quo pending judicial review, while denial would permit irreversible actions to proceed, including the dismantling of the program and displacement of students. Finally, the issuance of a Temporary Restraining Order serves the public interest by ensuring that decisions impacting public education are made through lawful, transparent, and adequately informed processes.

Accordingly, Plaintiffs respectfully request that this Court issue a Temporary Restraining Order pursuant to Alaska Rule of Civil Procedure 65(b), enjoining Defendants from taking any further action to implement the closure of Campbell STEM until such time as this matter can be fully and fairly adjudicated.

REQUEST FOR RELIEF

Plaintiffs respectfully request the following relief, as supported by the applicable standards governing temporary restraining orders and preliminary injunctions and as demonstrated above:

1. **Issue a Temporary Restraining Order** immediately enjoining Defendants, the Anchorage School District and the Anchorage School Board, including all officers, agents, employees, and all persons acting in concert with them, from taking any action to implement, advance, or facilitate the closure of Campbell STEM Elementary School;

2. **Issue a Preliminary Injunction** maintaining the status quo and prohibiting any further steps toward closure, consolidation, reassignment of students or staff, repurposing of the facility, or administrative transition of Campbell STEM Elementary School until this Court has fully reviewed and adjudicated the legality of Defendants' actions;
3. Order preservation of all funding, staffing, and programmatic elements associated with Campbell STEM Elementary School, including but not limited to:
 4. Retention of current staffing levels and positions;
 5. Continuation of all educational programming, including the nationally certified STEM program;
 6. Preservation of existing student enrollment structures and services;
 7. Maintenance of all operational resources necessary to ensure uninterrupted school function;
 8. Enjoin Defendants from reallocating, redirecting, encumbering, or otherwise altering the use of voter-approved bond funds associated with Campbell Elementary School, including those authorized under AO 2024-115, pending final resolution of this matter;
 9. Order Defendants to preserve all documents, communications, and electronically stored information related to the closure decision, including but not limited to emails, text messages, internal memoranda, financial analyses, meeting materials, and draft reports. Defendants shall certify compliance with such preservation obligations in accordance with Alaska Civil Rules 26 and 37.
10. Prohibit any retaliation, adverse action, or intimidation against any parent, student, staff member, witness, or community participant involved in opposition to the closure or in support of this action, including participation in public testimony or cooperation with Plaintiffs' legal efforts;
11. Declare the closure decision unlawful and invalid upon a finding that the process violated Alaska law, including but not limited to statutory requirements governing public meetings, notice, administrative procedure, and procedural due process;
12. Grant such additional and further relief as the Court deems just and proper, including the authorization of limited expedited discovery to ensure a complete administrative record and meaningful judicial review.

**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE**

Plaintiffs:	)	
Campbell STEM Preservation & Education	)	
Foundation, Alaska Corporation	)	
	)	
v.	)	
	)	
Defendants:	)	
Anchorage School District	)	
and Anchorage School Board	)	
	)	
	)	Case No: _____

**MEMORANDUM IN SUPPORT OF PLAINTIFF’S MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I. INTRODUCTION

Plaintiff seeks immediate injunctive relief to halt the closure of Campbell STEM Elementary School. Defendant Anchorage School District (“ASD”) advanced and approved this closure through a procedurally deficient process that violated the Alaska Open Meetings Act, AS 44.62.310, and deprived the public of meaningful participation.

ASD issued notice on February 13, 2026, immediately preceding a three-day federal holiday weekend (Ex. D), conducted limited public testimony on February 17, 2026 without meaningful discussion or disclosure of decision-making criteria (Ex. H; Meetings 2-4), and voted to close the school on February 24, 2026—approximately one week after initial notice (Ex. F).

Implementation is already underway (Wake Aff. ¶16). Without immediate intervention, Plaintiff and similarly situated families will suffer irreparable academic harm, including disruption of educational continuity, loss of access to a nationally certified STEM program, and interference with established instructional relationships.

II. FACTUAL BACKGROUND

On February 13, 2026, ASD issued formal notice identifying Campbell STEM as a proposed closure (Ex. D). This notice was released immediately prior to a federal holiday weekend, effectively limiting the public’s ability to review and respond.

At February 17, 2026, Board meeting, ASD allowed only limited, one-directional testimony, with no meaningful dialogue or opportunity for public inquiry. Testimony was restricted due to time constraints, allowing only a small number of speakers despite widespread community opposition (Ex. E; Wake Aff. ¶13).

All testimony presented opposed the closure of Campbell STEM. Despite this, ASD proceeded to vote on February 24, 2026 to close the school, without disclosing the methodology, scoring criteria, or supporting data used to select schools.

Campbell STEM is a specialized, nationally certified program with unique curriculum and partnerships not replicated at other schools. Its closure will result in immediate academic harm, including disruption of individualized education plans (IEPs), loss of program continuity, and severance of established teacher-student relationships (Wake Aff. ¶15).

ASD has already begun implementing closure actions, including reassignment planning and logistical preparations (Wake Aff. ¶16), making the harm imminent.

III. LEGAL STANDARD

A Temporary Restraining Order and Preliminary Injunction are warranted where Plaintiff demonstrates:

1. Likelihood of success on the merits
2. Irreparable harm
3. Balance of equities favors relief
4. Injunction is in the public interest

Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20 (2008).

Under Alaska Rule of Civil Procedure 65(b), a TRO may issue where “immediate and irreparable injury, loss, or damage will result” before the opposing party can be heard.

Actions taken in violation of the Alaska Open Meetings Act are void. AS 44.62.310(e).

IV. ARGUMENT

A. Plaintiff Is Likely to Succeed on the Merits

ASD violated the Alaska Open Meetings Act, AS 44.62.310(a), by failing to provide reasonable notice and meaningful opportunity for public participation.

The February 13 notice (Ex. D) followed by a February 24 vote (Ex. F) created an unreasonably compressed timeline. This timeline, combined with the intervening federal holiday weekend, deprived the public of a meaningful opportunity to review and respond.

Alaska courts require substantive—not superficial—compliance with open meetings laws. In *Hickel v. Southeast Conference*, 868 P.2d 919, 928 (Alaska 1994), the Court held that the purpose of the OMA is to ensure the public can understand and respond to government decisions. Similarly, *Tunley v. Municipality of Anchorage School District*, 631 P.2d 67, 80 (Alaska 1981), requires genuine opportunities for participation.

Here, the February 17 meeting allowed only limited testimony with no dialogue or disclosure of methodology (Wake Aff. ¶3–4). Without access to the criteria or data used, stakeholders could not meaningfully evaluate or challenge the decision.

Under *Keane v. Local Boundary Commission*, 893 P.2d 1239, 1245 (Alaska 1995), agency decisions must be based on a record that permits meaningful participation and review. ASD's failure to disclose its analytical framework rendered such participation impossible.

Accordingly, the closure decision is void or voidable under AS 44.62.310(e).

B. Plaintiff Will Suffer Irreparable Harm

Plaintiff will suffer immediate and irreparable harm absent injunctive relief.

Campbell STEM provides a unique, nationally certified educational program (Ex. E). Its closure will result in:

- Loss of specialized STEM instruction
- Disruption of educational continuity
- Interruption of IEP-supported services
- Loss of established teacher-student relationships

(Wake Aff. ¶15)

These harms are already unfolding due to active implementation (Ex. F; Wake Aff. ¶16).

Under Alaska R. Civ. P. 65(b), such immediate and non-compensable harm warrants emergency relief.

Federal precedent reinforces this principle. In *Mathews v. Eldridge*, 424 U.S. 319 (1976), and *Goldberg v. Kelly*, 397 U.S. 254 (1970), the Court held that meaningful process is required before deprivation of significant interests. Here, students are being deprived of a specialized education without adequate procedural safeguards.

C. The Balance of Equities Favors Plaintiff

The equities strongly favor Plaintiff.

Plaintiff faces immediate and irreversible harm to children's education. ASD faces only a temporary delay in implementation pending judicial review.

Under *A.J. Industries, Inc. v. Alaska Public Service Commission*, 470 P.2d 537, 540 (Alaska 1970), injunctive relief is appropriate where the balance of hardships tips sharply in favor of the moving party.

ASD's asserted financial benefits are speculative and incomplete, failing to account for transportation, relocation, and transition costs (Ex. K; Meeting 2 [01:34:45]).

D. The Public Interest Supports Injunctive Relief

The public interest supports an injunction.

The Alaska Open Meetings Act exists to ensure transparency and public participation. *Hickel*, 868 P.2d at 928.

The public also has a strong interest in preserving stable and specialized educational programs. The loss of Campbell STEM impacts not only current students but the broader community. An injunction preserves the status quo, protects students, and ensures compliance with the law.

V. RULE 65(b) CERTIFICATION

Pursuant to Alaska R. Civ. P. 65(b), Plaintiff certifies that immediate and irreparable injury will occur before Defendant can be heard.

ASD has already initiated closure implementation (Wake Aff. ¶6), including reassignment and transition planning. These actions will result in irreversible disruption to students' education if not immediately enjoined.

Plaintiff further certifies that efforts to provide notice should not delay relief due to the immediacy of harm and the rapidly advancing implementation timeline.

VI. CONCLUSION

Plaintiff has satisfied all requirements for injunctive relief.

The closure decision was made in violation of Alaska law, and its implementation will cause immediate and irreparable harm.

Plaintiff respectfully requests that this Court:

1. Issue a Temporary Restraining Order halting the closure of Campbell STEM Elementary School;
2. Enjoin further implementation pending full adjudication; and
3. Grant such other relief as the Court deems just and proper.

EXHIBIT INDEX

Exhibit A - Timeline of Rightsizing Initiatives

Exhibit B - ASD Rightsizing Presentation, November 4, 2024

Exhibit C - ASD Resolution #25-26-01(S.1)

Exhibit D - Campbell STEM School Closure Email Notification

Exhibit E - 2/17/26 ASD Meeting Minutes

Exhibit F - ASD Memorandum #137

Exhibit G - School Board/Assembly Statements Regarding Notice and Process

Exhibit H – Administration Statements Regarding Timeline and Process

Exhibit I - ASD Board Meeting Minutes, March 17, 2026

Exhibit J – Administration Statements Regarding Reasons for Closure

Exhibit K – Statements Contradicting Reasons for Closure

Exhibit L – Kalb Affidavit

Exhibit M – Wake Affidavit[BK1]

EXHIBIT A

Timeline of Rightsizing Initiatives and Public Engagement between 2022 and 2026

The following are true and accurate timelines from publicly available meeting agendas and presentations from the Anchorage School District and Anchorage School Board.

2022 ASD Closure/Right-Sizing Activity – 62 Days between Notice and Closure

- **October 18, 2022**
 - ASD presents closing six elementary schools
 - Abbott Loop Elementary
 - Birchwood ABC Elementary
 - Klatt Elementary
 - Nunaka Valley Elementary
 - Northwood Elementary
 - Wonder Park Elementary
 - **Throughout November and December 2022**
 - Series of six public town hall meetings for community input at each of the proposed schools
 - Three regular school board meetings are held where public can testify
 - **December 19, 2022**
 - At a regular Anchorage School Board meeting, the Board votes to include only Abbott Loop Elementary's closure in its preliminary budget guidance to address an estimated deficit.
-

2024 ASD Closure/Right-Sizing Activity – 43 Days between Notice and Closure

- **November 4, 2024**
 - ASD presents a draft list of seven schools for possible closure
 - Baxter Elementary
 - Bear Valley Elementary
 - Fire Lake Elementary
 - Lake Hood Elementary
 - Nunaka Valley Elementary
 - Tudor Elementary
 - Wonder Park Elementary
- **Throughout November and December 2024**
 - Five town hall events are held
 - Two regular school board meeting are held where the public can testify

- **December 3, 2024**
 - ASD removes three schools from the proposed closure list and adjusts closure timelines for the remaining schools toward 2025 implementation.
- **December 17, 2024**
 - School Board votes to close Lake Hood Elementary and Nunaka Valley Elementary

2025 ASD Closure/Right-Sizing Activity – 43 days between Notice and Closure

- **October 6, 2025**
 - ASD presents closure recommendations for:
 - Fire Lake Elementary
 - Lake Otis Elementary
- **End of October and Early November 2025**
 - Five town hall events are held
 - Two regular school board meetings are held where the public can testify
- **November 18, 2025**
 - School Board votes not to close schools

2026 ASD Closure/Right-Sizing Activity – 11 days between Notice and Closure (6 business days

- **February 13, 2026 at approximately 4:00PM**
 - ASD releases closure recommendations for:
 - Fire Lake Elementary
 - Lake Otis Elementary
 - Campbell STEM Elementary
- **February 17, 2026**
 - Only opportunity for public testimony or engagement (in-person testimony must sign up to testify by 11:59PM February 16, 2026)
- **February 24, 2026**
 - School Board votes to close all three schools

Received in the Alaska Trial Courts on 04/15/2026.



Anchorage School District
Educating All Students for Success in Life

Received in the Alaska Trial Courts on 04/09/2026.

Properly Resourced Schools Look Like...



1st/2nd
3rd/4th



October 1st, 2024

- Communication with families
- Parent open houses at receiving schools
- Abbott Loop School Celebration
- Celebrations at each receiving school
- Student placement at new schools
- Staffing – intentional teacher placements
- Regular principal meetings and coordination

Summary of Enrollment, Declining Birthrate, Education Levels of Service & Facilities

June 4th, 2024

Student Outcomes from Abbott Loop closure, Survey Results, Enrollment History

September 17th, 2024

ASD Facilities Overview



Guardrails, 3rd Survey Summary, Rightsizing Components, Evaluation Rubric

October 15th, 2024

Properly Resourced Schools Look Like...



What is Rightizing



Received in the Alaska Trial Court on 04/15/2026.

Small School Pros & Cons, School size & Levels of Service, Potential repurpose possibilities

Enrollment Analysis

Board Guidance

Evaluating boundaries, School analysis &

3

3rd Survey September 2024 Results Overview

School Programs

School Size and Features

Operational Cost & Efficiencies

Neighborhood Enrollment

School Evaluation Rubric Components

Received in the Alaska Trial Courts on 04/15/2026.

4

Overall Score = Average of subgroups rated 5 → 1

- Partial staff increments for Specials staff & SPED Itinerant staff
- % Combos

Overall Score = Average of subgroups rated 1 → 5

- % Economically Disadvantaged, % SPED and % ELL

Overall Score = Average of subgroups rated 5 → 1

- New Housing Potential
- Enrollment Decline Expectations

Overall Score = Average of subgroups rated 5 → 1

- Current utilization and projections for SY 25/26 and SY 29/30

Overall Score = Average of subgroups rated 5 → 1

- Component life cycle replacement costs next 2 years

- Recent major maintenance improvements & repairs
- Short-term planned improvements

Overall Score = Average of subgroups rated 5 → 1

- Maintenance & operational cost per student
- Utilities cost per sq. ft.

Overall Score = Average of subgroups rated 5 → 1

- Co-location potential of facility
- % Age 0-4 population (potential incoming students)

Rubric Scores for Lowest 45 Schools

School	Effectiveness Staffing	Weighting Factor	Size and Utilization	Weighting Factor	School Impacts	Weighting Factor	Condition	Weighting Factor	Effectiveness Cost	Weighting Factor	Growth Potential	Weighting Factor	Alternative Use	Weighting Factor	Combiner Score	Group Based on Normalized Quintile
Fire Lake	2.7	2.0	1.0	2.0	3.0	1.0	1.0	2.0	1.0	1.0	2.0	1.0	3.0	1.0	18.3	1
Bear Valley	3.0	2.0	2.0	2.0	1.0	1.0	1.0	2.0	3.7	1.0	1.5	1.0	2.0	1.0	20.2	1
O'Malley	2.7	2.0	2.3	2.0	1.0	1.0	1.0	2.0	2.7	1.0	2.5	1.0	3.0	1.0	21.2	1
Lake Hood	2.3	2.0	1.0	2.0	4.0	1.0	2.0	2.0	1.3	1.0	3.0	1.0	3.0	1.0	22.0	1
Alpenglow	2.7	2.0	1.3	2.0	2.0	1.0	2.0	2.0	2.7	1.0	2.0	1.0	4.0	1.0	22.7	2
Homestead	3.3	2.0	1.3	2.0	1.0	1.0	3.0	2.0	2.7	1.0	2.0	1.0	2.5	1.0	23.5	2

Received in the Alaska Trial Courts on 04/15/2026

Lake Otis	4.3	2.0	1.3	2.0	5.0	1.0	1.0	2.0	2.0	1.0	1.5	1.0	2.5	1.0	24.3	2
Baxter	4.0	2.0	1.3	2.0	5.0	1.0	1.0	2.0	2.7	1.0	2.0	1.0	2.0	1.0	24.3	2
Fairview	3.0	2.0	2.0	2.0	5.0	1.0	1.0	2.0	2.3	1.0	1.5	1.0	3.5	1.0	24.3	2
Inlet View	1.7	2.0	3.7	2.0	2.0	1.0	1.0	2.0	3.3	1.0	2.5	1.0	4.0	1.0	24.5	2
Russian Jack	2.3	2.0	1.7	2.0	5.0	1.0	2.0	2.0	1.7	1.0	2.5	1.0	3.5	1.0	24.7	2
Chugiak	3.7	2.0	4.0	2.0	1.0	1.0	1.0	2.0	3.0	1.0	1.5	1.0	2.0	1.0	24.8	2
Huffman	2.7	2.0	2.3	2.0	1.0	1.0	3.0	2.0	3.0	1.0	2.0	1.0	3.0	1.0	25.0	2
Klatt	3.0	2.0	2.3	2.0	5.0	1.0	1.0	2.0	2.0	1.0	2.5	1.0	3.5	1.0	25.7	3
Northwood	3.0	2.0	2.0	2.0	5.0	1.0	1.0	2.0	3.0	1.0	2.0	1.0	4.0	1.0	26.0	3
Scenic Park	2.7	2.0	4.0	2.0	2.0	1.0	1.0	2.0	3.3	1.0	3.0	1.0	2.5	1.0	26.2	3
Campbell STEM	3.0	2.0	2.7	2.0	4.0	1.0	2.0	2.0	3.3	1.0	1.5	1.0	2.0	1.0	26.2	3
Taku	2.0	2.0	3.7	2.0	4.0	1.0	2.0	2.0	1.3	1.0	3.0	1.0	2.5	1.0	26.2	3
Nunaka Valley	3.7	2.0	1.7	2.0	4.0	1.0	2.0	2.0	2.0	1.0	2.0	1.0	3.5	1.0	26.2	3
Rogers Park	2.3	2.0	2.7	2.0	3.0	1.0	3.0	2.0	4.3	1.0	1.0	1.0	2.0	1.0	26.3	3
Chinook	3.0	2.0	3.0	2.0	4.0	1.0	2.0	2.0	3.0	1.0	1.0	1.0	2.5	1.0	26.5	3
Birchwood ABC	3.3	2.0	2.3	2.0	2.0	1.0	3.0	2.0	1.3	1.0	4.0	1.0	2.0	1.0	26.7	3
Trailside	4.0	2.0	2.7	2.0	3.0	1.0	2.0	2.0	2.7	1.0	1.5	1.0	2.5	1.0	27.0	3
Tudor	2.3	2.0	3.0	2.0	3.0	1.0	3.0	2.0	2.0	1.0	2.0	1.0	3.5	1.0	27.2	3
Spring Hill	4.3	2.0	2.7	2.0	5.0	1.0	1.0	2.0	2.3	1.0	1.0	1.0	3.0	1.0	27.3	3

Girdwood	2.3	2.0	2.3	2.0	2.0	1.0	5.0	2.0	1.3	1.0	3.0	1.0	2.0	1.0	27.7	3
Chugach Optional	2.7	2.0	4.0	2.0	1.0	1.0	2.0	2.0	4.0	1.0	2.5	1.0	3.0	1.0	27.8	3
Mountain View	2.3	2.0	1.0	2.0	5.0	1.0	4.0	2.0	1.7	1.0	2.5	1.0	4.0	1.0	27.8	3
North Star	4.0	2.0	1.7	2.0	5.0	1.0	2.0	2.0	3.7	1.0	1.0	1.0	3.0	1.0	28.0	3
Turnagain	2.7	2.0	1.0	2.0	3.0	1.0	5.0	2.0	3.3	1.0	2.0	1.0	2.5	1.0	28.2	3
Kincaid	4.3	2.0	2.0	2.0	3.0	1.0	3.0	2.0	2.3	1.0	1.5	1.0	3.0	1.0	28.5	3
Bayshore	4.0	2.0	2.3	2.0	2.0	1.0	3.0	2.0	3.3	1.0	1.0	1.0	3.5	1.0	28.5	3
Chester Valley	2.3	2.0	1.3	2.0	4.0	1.0	5.0	2.0	2.3	1.0	1.5	1.0	3.5	1.0	28.7	3
Willow Crest	3.7	2.0	2.7	2.0	5.0	1.0	2.0	2.0	2.3	1.0	2.5	1.0	2.5	1.0	29.0	3
Gladys Wood	3.7	2.0	2.0	2.0	4.0	1.0	3.0	2.0	3.7	1.0	1.5	1.0	2.5	1.0	29.0	3
Williwaw	4.3	2.0	3.0	2.0	5.0	1.0	1.0	2.0	2.0	1.0	2.0	1.0	3.5	1.0	29.2	3
Ocean View	2.7	2.0	3.7	2.0	3.0	1.0	3.0	2.0	3.0	1.0	2.5	1.0	2.5	1.0	29.7	4
Ravenwood	4.3	2.0	4.0	2.0	1.0	1.0	2.0	2.0	4.7	1.0	2.0	1.0	2.0	1.0	30.3	4
College Gate	2.7	2.0	3.3	2.0	4.0	1.0	3.0	2.0	3.7	1.0	1.5	1.0	3.5	1.0	30.7	4
Rabbit Creek	4.0	2.0	2.0	2.0	2.0	1.0	5.0	2.0	3.7	1.0	1.0	1.0	2.0	1.0	30.7	4
Aurora	4.3	2.0	3.0	2.0	2.0	1.0	3.0	2.0	3.3	1.0	1.0	1.0	4.0	1.0	31.0	4
Wonder Park	4.0	2.0	2.7	2.0	5.0	1.0	1.0	2.0	3.0	1.0	3.0	1.0	5.0	1.0	31.3	4
Denali	4.7	2.0	2.3	2.0	3.0	1.0	3.0	2.0	4.0	1.0	2.5	1.0	2.0	1.0	31.5	4
Kasuun	3.7	2.0	3.3	2.0	4.0	1.0	3.0	2.0	2.0	1.0	2.0	1.0	3.5	1.0	31.5	4

Ursa Minor	3.7	2.0	4.3	2.0	1.0	1.0	2.0	2.0	5.0	1.0	2.0	1.0	4.0	1.0	32.0	4
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School Analysis

Received in the Alaska Trial Courts on 04/15/2026.

Rubric narrows list of potential schools that require further analysis

Detailed

Analysis

Recommendation

SBoundary Changes

Close, Combine & Repurpose

Renew

Replace

Retire

Timeline

Closure &

Consolidation Recommendations

Fire Lake / 18.2

Low Score Factors

Staffing Effectiveness
Size & Utilization
Building Condition
Cost effectiveness
Growth Potential

Baxter / 24.3

Low Score Factors

Size and Utilization %
Building Condition
Cost Effectiveness
Growth Potential

Bear Valley / 20.2 Low Score Factors

Growth Potential
Size and Utilization %
Building Condition
Cost Effectiveness

Baxter

Bear Valley

Fire Lake

Lake Hood

Nunaka Valley

Tudor

Wonder Park

***Schools in blue are Title I Schools**

Tudor / 27.2

Low Score Factors

Staffing Effectiveness
Cost Effectiveness
Growth Potential
Nunaka Valley / 26.2

Low Score Factors

Size and Utilization %
Building Condition
Cost Effectiveness
Growth Potential

Lake Hood / 22.0

Low Score Factors

Staffing Effectiveness
Size and Utilization %
Cost Effectiveness

Wonder Park / Combined 31.3
Low Score Factors

Building Condition
(Open Space School)
Size and Utilization %
School Impacts

Received in the Alaska Trial Courts on 4/11/2026.

School Detailed Analysis Results

Top 45 ES Schools for Detailed Analysis

Chester Valley Fire Lake

Chinook

Chugach

Chugiak

College Gate

Denali

Fairview

Received in the Alaska Trial Courts on 04/15/2026.

Girdwood
Gladys Wood
Homestead
Huffman
Inlet View

Kasuun
Kincaid
Klatt
Lake Hood
Lake Otis

Mountain View
North Star
Northwood
Nunaka Valley
Ocean View
O'Malley
Rabbit Creek
Ravenwood
Rogers Park
Russian Jack
Scenic Park
Spring Hill
Taku
Trailside
Tudor
Turnagain
Ursa Minor
Williwaw
Willow Crest
Wonder Park

*Schools in blue are Title I Schools

Analysis of the Top 45 Potential Schools

Recommended Schools

Baxter
Bear Valley
Fire Lake
Lake Hood
Nunaka Valley
Tudor
Wonder Park
Birchwood
Chester
Valley
Chugiak
College Gate
Denali
Eagle River
Huffman
Lake Otis

Received in the Alaska Trial Courts on 04/15/2026.

Gaining Schools

Northwood
O'Malley
Rabbit Creek
Russian Jack
Scenic Park
Turnagain
Williwaw

Closing/Repurpose

Alpenglow

Aurora
Bayshore
Campbell

Remaining 24 of Top 45 Potential Schools

Kincaid

Chinook
Chugach
Fairview

Girdwood
Gladys
Wood
Homestead
Inlet View
Kasuun
Klatt
Mountain View
North Star
Ocean View
Ravenwood
Rogers Park
Spring Hill
Taku
Trailside
Ursa Minor
Willow Crest

*Schools in blue are
Title I Schools

Refining List for Partial Repurposing

Received in the Alaska Trial Courts on 04/15/2026.

Potential

Aurora

Girdwood

Inlet View

Ursa Minor

Schools > 80%
Utilization

Chugach

Ravenwood **Spring Hill**

Taku

Partial Repurposing
Candidates

***Schools in blue are
Title I Schools**

Removed from Closure

Received in the Alaska Trial Courts on 04/15/2026.

- Bayshore
- Campbell
- Chinook
- Fairview
- Gladys Wood
- Homestead
- Kasuun
- Kincaid
- Klatt
- Mountain View
- North Star
- Ocean View
- Rogers Park
- Trailside
- Willow Crest

Alpenglow

Recommendation for Close/Combine & Repurpose

Closing
Schools Remarks Receiving Schools

<u>Bear Valley ES</u> (Year 1) (69%)	<u>Lake Hood ES</u> (Year 1) (39%)	<u>Tudor ES</u> (Year 1)	(69%) <u>Fire Lake ES</u>
---	---------------------------------------	-----------------------------	------------------------------

(Year 2)
(47%)

Nunaka Valley ES (Year 2)
(63%)

Wonder Park ES (Year 2)
(66%)

Baxter ES
(Year 3)
(56%)
• Closure

• Repurpose building: **Charter**

School • Programs affected: Pre-K,

SBBS program • Repurpose building:

Whaley K-12 & Outreach

• Programs affected: Montessori
program moves to Denali
Montessori

• Repurpose building: **Charter**

School • Programs affected: SLC
program

• Repurpose building: **Pre-K School**

• Programs affected: 7 Pre-K classes
stay

• Closure

• Programs affected: Pre-K, SLC
program

• Repurpose building: **Charter**

School • Programs affected: SLC
program

80 students to O'Malley ES

104 students to Rabbit Creek ES

121 students to Huffman ES

113 students to Turnagain ES 62

students to Northwood ES

179 students to Lake Otis ES 124

students to Denali Montessori ES

108 students to Eagle River ES 40

students to Birchwood ABC ES 2

students to Chugiak ES

39 students to Chester Valley ES

57 students to Russian Jack ES

103 students to Williwaw ES

78 students to Ptarmigan ES

53 students to Scenic Park ES 99

students to College Gate ES 17

students to Chester Valley ES

12 12

Timeline of Major Events

closures and/or repurposing

NOV 4th –
Initial list of recommended

DEC 17th
Board Rightsizing Decision

Received from the Alaska Trial Courts on 04/15/2026.

Received in the Alaska Trial Courts on 04/15/2026.

OCT 15th Board
Rightsizing
Guidance

Dimond HS NOV
16th - Bartlett HS

NOV 12th - Chugiak
HS NOV 13th -
MECAC NOV 14th -

DEC 3rd
Rightsizing on Non
Action

NOV 18th - Virtual (11am & 6pm)

**Questions/Comments?
Map Slides**

Bear Valley Student

Received in the Alaska Trial Courts on 04/15/2026.

Distribution *104 Students to*

Rabbit Creek ES

Received in the Alaska Trial Courts on 04/15/2026.

*121 Students to
Huffman ES*

*80 Students to
O'Malley ES*

16

Lake Hood Student Distribution

Received in the Alaska Trial Courts on 04/15/2026.

Received in the Alaska Trial Courts on 04/15/2026.

32 Students to Northwood ES

17

Nunaka Valley Student Distribution

***39 Students to
Chester Valley ES***

Received in the Alaska Trial Courts on 04/15/2026.

Received in the Alaska Trial Courts on 04/15/2026.

Received in the Alaska Trial Courts on 04/15/2026.

***2 Students to
Chugiak ES***

***40 Students to
Birchwood ABC***

***108 Students to
Eagle River ES***

Fire Lake Student Distribution

Tudor Student Distribution

Received in the Alaska Trial Courts on 04/15/2026.

Received in the Alaska Trial Courts on 04/15/2026.

Distribution

20

Wonder
Park
Student

Received in the Alaska Trial Courts on 04/15/2026.

103 Students to
Williwaw ES

Received in the Alaska Trial Courts on 04/15/2026.

21

Baxter Student Distribution

*17 Students to
Chester Valley
ES*

*53 Students to
Scenic Park ES*

*99 Students to
College Gate ES*

22

Overall
District
- Age 0

- 4 Population Density - Green = Highest, Red
= Lowest

Received in the Alaska Trial Courts on 04/15/2026.

Received in the Alaska Trial Courts on 04/15/2026.

South
Anchorage
- Age 0 - 4
Population
Density -
Green =
Highest,
Red =
Lowest

Received in the Alaska Trial Courts on 04/15/2026.

Received in the Alaska Trial Courts on 04/15/2026.

**Agenda Item Details**

Meeting	Feb 09, 2026 - School Board Special Meeting
Category	C. Action Items
Subject	1. ASD Resolution #25-26-01 Directing the ASD Administration to Identify School Consolidation and Operational Efficiency Options to Preserve and Strengthen Student Academic Programs
Type	Action
Recommended Action	To approve ASD Resolution #25-26-01(S.1) Directing the ASD Administration to Identify School Consolidation and Operational Efficiency Options to Preserve and Strengthen Student Academic Programs.

ASDR# 25-26-01(S.1)**A Resolution Directing the ASD Administration to Identify School Consolidation and Operational Efficiency Options to Preserve and Strengthen Student Academic Programs**

WHEREAS, the Anchorage School Board is responsible for adopting a balanced budget for submission to the Municipality of Anchorage by March 2nd, 2026, and for stewarding public resources in alignment with the District's mission of preparing all students for success in life; and

WHEREAS, the District is facing a structural operating deficit for fiscal year 2026-2027 of approximately \$90 million, driven by sustained enrollment decline, extraordinary inflation that has reduced per-student purchasing power by approximately \$1,400, and largely flat and unpredictable state education revenues; and

WHEREAS, the District has projected that even after \$90 million in reductions are made for the forthcoming year, continued flat funding from the State would mean that the District's expected cost increases for medical and liability insurance and to salaries, benefits, services and supplies at rates higher than inflation will require the Board to confront additional budget shortfalls of \$42 million in fiscal year 2027-2028 and \$30 million in fiscal year 2028-2029; and

WHEREAS, underutilized elementary school facilities, elementary schools with low enrollment levels, more heavily utilized elementary school facilities which enroll students in two separate academic programs at low levels in one or both programs, and small and/or

underutilized secondary school facilities strain limited resources, are vulnerable to staffing instability, large or combination classrooms, and reductions in student services, and reduce the District's ability to consistently provide robust academic programs and student support services across all schools; and

WHEREAS, strategic consolidation for FY27 and beyond would allow resources to be combined to strengthen academic offerings, staffing models, and student supports; and

WHEREAS, in November 2025, the Board declined to advance school consolidation proposals presented by the administration, reflecting the seriousness of such decisions and the importance of community considerations; and

WHEREAS, since that time, updated financial information, increased community focus on preserving student programs, the urgency of the FY27 budget development process, and the administration's long term fiscal projections have prompted the Board to reexamine whether previously analyzed consolidation options should be reconsidered and/or whether new options should be evaluated; and

WHEREAS, the Board recognizes that although school consolidations and program relocations require thoughtful academic, operational, and equity analysis and that the current timeline necessitates substantial reliance on the most recent analyses conducted by the administration, the Board also recognizes that the administration may still be able to identify new opportunities to promote efficiencies and/or identify options for facility repurposing prior to its adoption of the FY27 Budget;

NOW, THEREFORE, BE IT RESOLVED, that the Anchorage School Board directs the Superintendent and administration to **expeditiously identify school consolidation and related operational efficiency options** that could improve academic service levels for students and generate short-term and long-term savings, including:

1. **Previously analyzed school consolidation proposals** presented to the Board in Fall 2025, recognizing the urgency of the current fiscal situation and the value of the most current research and analysis;
2. **Additional near-term efficiency opportunities**, including program relocations, special program consolidations, or co-locations that could yield savings while maintaining or strengthening academic quality; and
3. **Options for facility repurposing**, including leasing, co-location, or declaring facilities excess where appropriate, to support longer-term fiscal sustainability;

BE IT FURTHER RESOLVED, that the administration's analysis shall, to the extent feasible within the compressed timeline, address academic impact, service level changes, enrollment trends, transportation considerations, equity implications, and fiscal effects;

BE IT FURTHER RESOLVED, that the Board requests identified options be posted publicly no later than February 14, 2026 and formally presented no later than February 17, 2026, recognizing the extraordinary time constraints associated with this request;

BE IT FURTHER RESOLVED, that public feedback on any newly identified options or consolidation proposals would be accepted before or during the meeting on February 17, 2026, and that additional written feedback would be accepted prior to the special meeting scheduled for February 24, 2026;

BE IT FURTHER RESOLVED, that the Board affirms its intent that any near-term savings realized through such actions be prioritized for reinvestment in direct student programs and services, including but not limited to academic supports, student activities & sports, and health services; and

BE IT FINALLY RESOLVED, that the Board directs the administration to propose a process to develop a long-range school consolidation plan, informed by data and community engagement, to guide future decisions beyond the current budget cycle.

Carl Jacobs, School Board President

Margo Bellamy	Dave Donley
Pat Higgins	Andy Holleman
Kelly Lessens	Dora Wilson

Please note original resolution ASDR#25-26-01 was not voted on (original resolution below):

ASDR# 25-26-01

A Resolution Directing the ASD Administration to Identify School Consolidation and Operational Efficiency Options to Preserve and Strengthen Student Academic Programs

WHEREAS, the Anchorage School Board is responsible for adopting a balanced budget for submission to the Municipality of Anchorage by March 2nd, 2026, and for stewarding public resources in alignment with the District's mission of preparing all students for success in life; and

WHEREAS, the District is facing a structural operating deficit of approximately \$90 million, driven by

sustained enrollment decline, extraordinary inflation that has reduced per-student purchasing power by approximately \$1,400, and largely flat and unpredictable state education revenues; and

WHEREAS, continued enrollment decline has resulted in underutilized school facilities that strain limited resources and reduce the District's ability to consistently provide robust academic programs and student support services across schools; and

WHEREAS, schools with persistently low enrollment are more vulnerable to staffing instability, combination classrooms, and reductions in student services, while strategic consolidation can allow resources to be combined to strengthen academic offerings, staffing models, and student supports; and

WHEREAS, in November 2025, the Board declined to advance school consolidation proposals presented by the administration, reflecting the seriousness of such decisions and the importance of community considerations; and

WHEREAS, since that time, updated financial information, increased community focus on preserving student programs, and the urgency of the FY27 budget development process have prompted the Board to reexamine whether previously analyzed consolidation options should be reconsidered; and

WHEREAS, the Board recognizes that school consolidations and program relocations require thoughtful academic, operational, and equity analysis, and that the current timeline necessitates reliance on the most recent analyses already conducted by the administration;

NOW, THEREFORE, BE IT RESOLVED, that the Anchorage School Board directs the Superintendent and administration to **expeditiously identify school consolidation and related operational efficiency options** that could improve academic service levels for students and generate short-term and long-term savings, including:

1. **Previously analyzed school consolidation proposals** presented to the Board in Fall 2025, recognizing the urgency of the current fiscal situation and the need to rely on the most current research and analysis;
2. **Additional near-term efficiency opportunities**, including program relocations, special program consolidations, or co-locations that could yield savings while maintaining or strengthening academic quality; and
3. **Options for facility repurposing**, including leasing, co-location, or declaring facilities excess where appropriate, to support longer-term fiscal sustainability;

BE IT FURTHER RESOLVED, that the administration's analysis shall, to the extent feasible within the compressed timeline, address academic impact, service level changes, enrollment trends, transportation considerations, equity implications, and fiscal effects;

BE IT FURTHER RESOLVED, that the Board requests identified options be presented no later than February 17, 2026, recognizing the extraordinary time constraints associated with this request;

BE IT FURTHER RESOLVED, that the Board affirms its intent that any near-term savings realized through such actions be prioritized for reinvestment in direct student programs and services, including but not limited to academic supports, student activities & sports, and health services; and

BE IT FINALLY RESOLVED, that the Board directs the administration to propose a process to develop a long-range school consolidation plan, informed by data and community engagement, to guide future decisions beyond the current budget cycle.

Carl Jacobs, School Board President

Margo Bellamy	Dave Donley
Pat Higgins	Andy Holleman
Kelly Lessens	Dora Wilson

[K. Lessens ASDR# 25-26-01\(S.1\).pdf \(84 KB\)](#)

Motion & Voting

Amendment #1: I move to delete subsection #1 on page 2 paragraph 3, and renumber subsections #2 and #3 accordingly.

Motion by Dave Donley, second by Margo Bellamy.

Final Resolution: Motion Fails

Yea: Dave Donley

Nay: Margo Bellamy, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

To approve ASD Resolution #25-26-01(S.1) Directing the ASD Administration to Identify School Consolidation and Operational Efficiency Options to Preserve and Strengthen Student Academic Programs.

Motion by Kelly Lessens, second by Dora Wilson.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

Nay: Dave Donley, Pat Higgins

§



J.P. Roulet <roulet.jeanpaul@gmail.com>

Fwd: Rightsizing ASD Update; Please read

2 messages

Jessika Aldridge <aldridgejessika@gmail.com>
 To: "J.P. Roulet" <roulet.jeanpaul@gmail.com>

Fri, Feb 13, 2026 at 3:56 PM

----- Forwarded message -----

From: **Anchorage School District** <noreply@asdk12.org>
 Date: Fri, Feb 13, 2026, 3:30 PM
 Subject: Rightsizing ASD Update; Please read
 To: <aldridgejessika@gmail.com>



Anchorage School District
Educating All Students for Success in Life

Dear Campbell STEM Families,

I am writing to share an important and difficult update regarding Campbell STEM Elementary School. After completing the analysis directed by the Anchorage School Board in [Resolution #25-26-01\(S.1\)](#), I will be recommending that the Board approve the closure of Campbell STEM Elementary School at the end of this school year as part of the [Rightsizing ASD project](#).

I recognize this news may come as a shock and may bring concern, frustration, and many questions. I want you to know that this recommendation was not made lightly, and that our highest priority moving forward is supporting every Campbell STEM student and family through this transition with care and stability.

This recommendation follows direction from the School Board to review prior rightsizing analyses and identify additional options that address enrollment trends, building utilization, academic programming and long-term financial sustainability. In response, the District conducted a review of enrollment patterns, staffing, facility conditions, and operational costs across our schools.

As part of this analysis, the District also had to consider facility reliability and long-term maintenance needs across the District. This year, Campbell STEM experienced facility-related disruptions that resulted in missed instructional time. I understand how disruptive those interruptions were for students and families.

These challenges are not the result of any actions by staff or students; they reflect the broader reality of aging facilities and increasing deferred maintenance pressures districtwide. As resources become more constrained, sustaining every building at the level our students deserve becomes increasingly difficult.

Like many districts across Alaska, ASD is facing enrollment declines combined with rising operational costs. Next year, the District is projected to face a [structural deficit of approximately \\$90 million](#). When enrollment decreases, but the number of buildings remains the same, resources are spread more thinly across facilities, staffing and programs. Combining school communities allows us to better stabilize staffing, protect academic offerings, and maintain consistent services for our students.

If the Board approves this recommendation, students would be reassigned as follows:

- Approximately 120 students who reside north of 76th Avenue would attend Willowcrest Elementary School
- Approximately 84 students would attend Gladys Wood Elementary School
- Approximately 45 students would attend Klatt Elementary School

In addition:

- Three developmental preschool classrooms would relocate to Taku Elementary School
- Three developmental preschool classrooms and one general education Preschool classroom would relocate to Sand Lake Elementary School

If approved by the School Board, our immediate focus will be ensuring a smooth and intentional transition for every Campbell STEM student. Families will receive clear information regarding school assignments, transportation eligibility, timelines, and opportunities for students to visit and become familiar with their new school communities. Our goal is that every student continues to feel known, supported, and safe, and that academic continuity is preserved.

The School Board will review this [recommendation](#) on Tuesday, Feb. 17, beginning with a work session at 3 p.m. and a regular meeting at 6 p.m. The Board is scheduled to vote on Tuesday, Feb. 24. Families may provide public testimony on Feb. 17 at the regular meeting and submit written feedback before the vote on the 24th. Your voice and perspective are important.

The financial and operational constraints that ASD faces reflect long-term funding and cost pressures, not a lack of care or commitment to ensuring student success. Still, these conditions require decisions that carry very real impacts for students and communities.

Please know this above all: this recommendation is centered on sustaining stable, high-quality learning environments and academic opportunities for students in the years ahead. It is not a reflection of the quality of Campbell STEM's educators, or the strength of this school community. Campbell STEM has served children well, and that legacy will always matter to ASD.

Thank you for the trust you have placed in our schools and for the care you show your children each day.

With sincerity and respect,

Jharrett Bryantt, Ed.D.
Superintendent
Anchorage School District

Received in the Alaska Trial Courts on 04/15/2026.



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Anchorage School District | [5530 E Northern Lights Blvd, Anchorage, AK 99504-3135](#)

Jessika Aldridge <aldridgejessika@gmail.com>
To: "J.P. Roulet" <roulet.jeanpaul@gmail.com>

Tue, Mar 31, 2026 at 8:58 PM

[Quoted text hidden]

School Board Meeting (Tuesday, February 17, 2026)

Generated by America Sullivan on Wednesday, February 18, 2026

The official record and details of this meeting can be found on the [ASD YouTube Channel HERE](#).

A. Regular Session

Procedural: 1. Call to Order / Roll Call / Flag Salute

Meeting Called to order at 6:01 PM.

Members present

Margo Bellamy (remote), Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson (remote), Andy Holleman

Madison Arreola, Student Representative, lead Flag Salute.

Procedural: 2. Land Acknowledgment / Opening Statement

Madison Arreola, Student Representative, lead The Land Acknowledgement.

Action: 3. Approval of Agenda

To approve the agenda.

Motion by Andy Holleman, second by Kelly Lessens.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Dora Wilson, Andy Holleman

B. Reports

Report: 1. Student Representative Report

Madison Arreola, Student Representative spoke.

Information: 2. Military Report

Report: 3. Board Conference and Committee Reports

C. Superintendent Update

Information, Report: 1. Superintendent Update

Dr. Jharrett Bryantt, Superintendent, spoke.

Kersten Johnson-Struempfer, Deputy Chief of Schools, spoke.

Likka McCauley, Sr. Director Elementary Education, spoke.

David Christal, Principal at Creekside Park Elementary.

Anna Walker, Principal at Bayshore Elementary, spoke.

Helena Batman, Sr. Director Elementary Education, spoke.

Jim Anderson, Chief Operating Officer, spoke.

Sven Gustafson, Deputy Superintendent, spoke.

Andy Ratliff, Chief Financial Officer, spoke.

Martin Lang, Chief Human Resources Officer, spoke.

D. Public Comment (1-Hour Time Limit)

Information: 1. Student Comment

Andy Zhang spoke against sports cuts.

Cade McGinley spoke against cutting Nordic skiing from school sports.

Carl Saltzman spoke against cutting swimming from school sports.

Della Boling spoke in support for keeping school sports.

Solveig Alcaraz spoke against cutting cross country skiing from school sports.

Teal Flint spoke against cutting cross country skiing and other school sports.

Audrey Walker sent in an audio on the middle school model.

Hazelynn Higgins spoke against closing Fire Lake Elementary.

Cheryl Rupert spoke in support of keeping cross country skiing.

Kevin Zhang spoke against cutting school sports.

Emma Sharp spoke on extra curricular activities and school sports.

Ida Avellaneda-Cruz spoke against cutting after school sports.

Sabreena Otts spoke against cutting wrestling in school sports.

Dakota Martinez spoke in support of keeping school nurses.

Makenna Martinez spoke against cutting school nurses.

Kayla-Marie Mendiola spoke in support keeping Campbell STEM elementary school.

Joanna Sowards spoke in support in keeping Nordic skiing.
 Nina Levke Frederike Runge spoke against cutting Nordic skiing from school sports.
 Anakin Harris spoke against closing Campbell STEM.
 Aria Flanigan spoke against cutting school sports.
 Cora Moe spoke on middle school electives.
 Adele Hayes spoke in support of Nordic skiing.
 Ariam Sofia spoke against eliminating skiing from school sports.
 Regan Manley spoke against cutting school sports including Nordic skiing.
 Paige Erickson spoke against cutting school sports.
 Garrett Chacon spoke against cutting school sports, specifically skiing.
 Victoria Orozco spoke in support of keeping school sports, specifically wrestling.
 Violet Armstrong spoke in support of keeping wrestling in high school sports.
 Scarlet MacClarence spoke against cutting school sports.
 Makenna Offrink spoke in support of keeping high school sports.
 Sky Allison spoke in support of keeping school nurses.
 Aria Nield spoke in support of keeping Campbell STEM.
 Cruz Freeborn spoke against closing Fire Lake elementary.
 Lola Freeman spoke against closing Fire Lake elementary.
 Fia Jones spoke against closing Fire Lake elementary.
 Avery Radke spoke in support of school sports, especially volleyball.
 Ian Leider spoke on school sports and why they are important to keep.
 Fiona Norton spoke on keeping O'malley elementary the way it is.

Information: 2. Public Comment

Five minute break at 9:30 PM.

Kris Armstrong spoke against cutting cross country skiing from school sports.
 Heather Wilson spoke against cutting school sports.
 Candace Pollock spoke against closing Fire Lake Elementary.
 Kenneth Higgins spoke against closing Fire Lake Elementary
 Laura Norton-Cruz spoke against cutting transportation to immersion schools.
 Autumn Otts spoke against cutting high school wrestling.
 Sarah Martinez spoke against a regional nursing model.
 Brittane Harris spoke against closing Campbell STEM.
 Jennifer Chacon spoke against cutting school sports.
 Jennifer Allison spoke against a regional nursing model and cutting school nurses.
 Mike Nield spoke against closing Campbell STEM.
 Kara Freeborn spoke against closing Fire Lake elementary.
 Ilona Leider spoke against losing specialist positions in elementary schools.
 Claire Norton-Cruz spoke against changing O'Malley elementary.
 Tyler Desjarlais spoke against cutting art and music teachers.
 Chelsea Ambrose spoke against cuts in arts and music teachers.
 Hannah Johnston spoke against cutting fine arts specialists.
 Ames Tonnesen spoke on advocating for elementary arts specialists.
 Megan Charles spoke against regional nursing model.
 Jennifer Cottle spoke against the proposed regional nursing model.
 Joel Sundberg spoke against cutting AKSDHH special education services.
 Brock Sides spoke against cutting nurses in schools.
 Susan Ritter spoke in support of keeping counselors and other special ed support positions.
 Katherine Brown spoke on how important school nurses are.
 Anne-Marie Moran spoke regarding concerns on the proposed nurse reductions in schools.
 Tyler Henegan spoke against high school sport cuts.
 Monica Sullivan spoke in support of school sports.
 Pamela Martes spoke in support of health specialists in schools.
 Paul McDonogh spoke on rightsizing.
 Karin Richards spoke on athletics and school nurses and how both are so important.
 Emma White spoke against the regional nurse model.
 Stacey Fuccillo spoke in support of school nurses.
 Greta Wade spoke against the regional nursing model and in support of nurses in schools.
 Jan Gilbert spoke with concerns of schools without full time nurses.
 Christi Sitz spoke on the proposed budget cuts.
 Krista Hepler spoke to advocate for one nurse in one school.
 Joan Eliassen spoke in support of one nurse, one school.
 Deadra Browne spoke on spending.
 Jacqui Higgins spoke on budget.
 Courtney Westmann signed on the importance of AKSD SPED teacher positions.
 Olin Raidmae spoke on class sizes, electives, and the importance of school nurses.
 David Hardy spoke on the lack of funding from the legislation.
 Christine Couturier spoke on O'Malley's rightsizing.
 Robert Misulich spoke in support of not changing the O'Malley school structure.
 Francis McLaughlin spoke in support of the Levy and keeping all immersion program teachers.

Motion to extend the meeting until midnight

Motion by Member Holleman, second by Member Lessens.

Kate Hammer spoke in support of keeping O'Malley Elementary structure the way it is, both immersion and neighborhood school.

Shanti Ward spoke in support of keeping Campbell STEM open.

Megan Peltier spoke in support of keeping O'Malley elementary immersion and neighborhood school.

Karen Rakos spoke against the Campbell STEM closure.

Stacia Thomas spoke in support of neighborhood schools.

Jeanne Robinson spoke against the Campbell STEM closure recommendation.

Charles Zimmer spoke on keeping Campbell STEM open.

Kim Bailey spoke on keeping elementary specialists and keeping O'Malley elementary with both immersion and neighborhood classes.

Cameron Hoyer spoke in support of keeping Campbell STEM open.

Amanda Adney spoke in support of school nurses: one nurse, one school.

Kathryn Wheelles spoke in support of school nurses, and against the regional nurses model.

Lisa Smith Fiegel spoke in support of keeping sixth grade at Denali Montessori.

Shannon Methe spoke on budget cuts, sports and extra curricular activities.

Mike Grunst spoke on school funding crisis.

Amber Sides spoke telephonically against a regional nursing model and in support of school nurses.

Shoko Takahashi spoke on the importance of fine arts in school.

Caitlin Poindexter spoke in support of Denali Montessori and Campbell STEM to remain open.

Sarah Sundberg spoke in support of keeping of keeping Campbell STEM open.

Miles Dennis spoke in opposition of cutting sports, specifically Nordic skiing.

Allison Paskin spoke in support of keeping nurses in all schools.

Kristine Kalb spoke in support of keeping Campbell STEM open.

Donna Yeates spoke in support of keeping Fire Lake elementary open.

Michelle Geidl spoke telephonically in support of keeping sixth grade at Denali Montessori.

Mark Norman spoke against the proposed closure of Campbell STEM.

Terri Wood spoke on the Campbell STEM proposed closure.

Holli Veloza spoke in opposition of the closure of Campbell STEM.

Erin Day's testimony was read on saving Fire Lake elementary.

Imre Manyoky spoke on school nurses.

Barry Kwan spoke in support of keeping Campbell STEM open.

Remaining five testifiers on the list will have the opportunity to speak at the February 25, 2026 Special Meeting, no other business was conducted for tonight's agenda. Adjourned at 12:00 AM per Municipal Code.

Information: 3. Written Public Comment

E. Consent Agenda

Action (Consent): 1. Voting on Consent Agenda

Action (Consent), Minutes: 2. February 3, 2026 Regular Meeting Minutes

Action (Consent): 3. ASD Memorandum #107 - Award of Contract: Network Equipment

Action (Consent): 4. ASD Memorandum #115 - Personnel Report

F. Action Items

Action: 1. ASD Memorandum #116 - Allocation of Major Maintenance Capital Improvement Grant Funds for Maintenance and Capital Projects

G. Non-Action Items

Information, Report: 1. ASD Memorandum #123 - Contract Modification/Amendment Report for the Month of January 2026 (Information Only)

Information: 2. ASD Memorandum #127 - Six-Year Capital Improvement Plan: July 1, 2026 - June 30, 2032 (Information Only)

Information: 3. ASD Memorandum #131 - FY 2026-2027 Preliminary Financial Plan and Budget (Second Reading)

Information: 4. ASD Memorandum #137 - ASD Rightsizing

H. Continued Public Comment on Non-Agenda and Non-Action Items

I. School Board & Administration Comments/Communications

Information: 1. School Board and Administration Comments

Report: 2. Community Outreach - Written Reports

J. Adjournment

Procedural: 1. Adjournment

Remaining five testifiers on the list will have the opportunity to speak at the February 25, 2026 Special Meeting, no other business was conducted for tonight's agenda.

Adjourned at 12:00 AM per Municipal Code.

Received in the Alaska Trial Courts on 04/15/2026.



Received in the Alaska Trial Courts on 04/15/2026.

Agenda Item Details

Meeting	Feb 24, 2026 - School Board Special Meeting
Category	E. Action Items
Subject	1. ASD Memorandum #137 - ASD Rightsizing
Type	Action
Recommended Action	It is the Administration's recommendation that the School Board approve and authorize the Superintendent to implement the closure of the following schools at the end of the 2025/26 school year: Fire Lake Elementary School (repurpose: offer to Eagle Academy Charter School), Lake Otis Elementary School (repurpose: offer to Rilke Schule Charter School), and Campbell STEM Elementary School (declare excess to the District's needs). The Administration further recommends that the School Board approve and authorize the Superintendent to implement the following additional recommendations, focused on improving education levels of service, near-term savings, structural efficiencies, and long-term fiscal savings: Relocate the Tudor Elementary School's Montessori program to Denali Montessori. Transition Denali Montessori's 6th grade to Middle Schools. Change the school boundary to move the non-immersion students at O'Malley Elementary School to Huffman Elementary School. O'Malley Elementary School becomes an alternative French Immersion School. Change the school boundary to move the non-immersion students at Government Hill Elementary School to Inlet View Elementary School. Government Hill Elementary School then becomes an alternative Spanish Immersion School. Upon relocating Rilke Schule Charter School to Lake Otis, declare Abbott Loop Elementary School as excess to the District's needs.

ANCHORAGE SCHOOL DISTRICT ANCHORAGE, ALASKA

ASD MEMORANDUM #137 (2025-2026)
FEBRUARY 24, 2026

TO: ASD SCHOOL BOARD

FROM: DR. JHARRETT BRYANTT, SUPERINTENDENT

SUBJECT: ASD RIGHTSIZING RECOMMENDATIONS

ASD Core Value: *The District will be open, transparent and accountable to the public.*

RECOMMENDATION:

It is the Administration's recommendation that the School Board approve and authorize the Superintendent to implement the closure of the following schools at the end of the 2025/26 school year: Fire Lake Elementary School (repurpose: offer to Eagle Academy Charter School), Lake Otis Elementary School (repurpose: offer to Rilke Schule Charter School), and

Campbell STEM Elementary School (declare excess to the District's needs).

The Administration further recommends that the School Board approve and authorize the Superintendent to implement the following additional recommendations, focused on improving education levels of service, near-term savings, structural efficiencies, and long-term fiscal savings:

- Relocate the Tudor Elementary School's Montessori program to Denali Montessori.
- ~~Transition Denali Montessori's 6th grade to Middle Schools.~~ **Clerks note, this change was approved at the February 24, 2026 Special School Board Meeting**
- Change the school boundary to move the non-immersion students at O'Malley Elementary School to Huffman Elementary School. O'Malley Elementary School becomes an alternative French Immersion School.
- Change the school boundary to move the non-immersion students at Government Hill Elementary School to Inlet View Elementary School. Government Hill Elementary School then becomes an alternative Spanish Immersion School.
- Upon relocating Rilke Schule Charter School to Lake Otis, declare Abbott Loop Elementary School as excess to the District's needs.

PERTINENT FACTS:

The District Administration's recommendations, in response to School Board Resolution #25-26-01, which was approved on February 9, 2026, are intended to help prioritize the District's limited resources. While there are clear advantages to maintaining small schools, current state funding levels do not provide the resources needed for the District to deliver consistent academic levels of service to all schools the District currently operates. As a result, higher numbers of combined-grade (Combo) classes, fractional FTE for high-need but low-density staff, and increasing deferred maintenance continue to impact the District's ability to adequately support small schools within the current operational footprint.

BACKGROUND:

On February 9th, 2026, the School Board passed Resolution #25-26-01, directing the Administration to do the following:

Expediently identify school consolidation and related operational efficiencies that could improve academic service levels for students and generate short-term and long-term savings, including:

1. Previously analyzed school consolidation proposals.
2. Additional near-term efficiency opportunities.
3. Options for facility repurposing.

The resolution also directed the following:

1. The analysis should address, to the extent feasible given time constraints, academic impact, service level changes, enrollment trends, transportation considerations, equity implications, and fiscal effects.
2. Identified options will be posted publicly no later than February 14, and formally presented no later than February 17, 2026.
3. Public feedback would be accepted before or during the meeting on February 17, 2026, and additional written feedback would be accepted prior to the special meeting scheduled for February 24, 2026.

SUMMARY:

The Administration will continue to seek efficiencies in infrastructure, program alignment, boundary adjustments and other areas to increase the District's flexibility in responding to

future enrollment trends, lack of appropriate funding, and evolving District priorities. The Administration will prepare a recommendation to repurpose cost savings generated by school closures, consolidations, and other efficiencies to restore some of the high priority program reductions in the FY 27 preliminary budget, which could potentially include student activities, athletics, healthcare services, etc.

JB/MF/AR/JA/MJT/ML

Prepared by: Jim Anderson, Chief Operating Officer

Approved by: Sven Gustafson, Deputy Superintendent

[Jacobs_Lessens Memo #137 Amendments 1 & 2.pdf \(80 KB\)](#)

Motion & Voting

Main Motion As Amended: It is the Administration's recommendation that the School Board approve and authorize the Superintendent to implement the closure of the following schools at the end of the 2025/26 school year: Fire Lake Elementary School (repurpose: offer to Eagle Academy Charter School), Lake Otis Elementary School (repurpose: offer to Rilke Schule Charter School), and Campbell STEM Elementary School (declare excess to the District's needs).

The Administration further recommends that the School Board approve and authorize the Superintendent to implement the following additional recommendations, focused on improving education levels of service, near-term savings, structural efficiencies, and long-term fiscal savings:

Relocate the Tudor Elementary School's Montessori program to Denali Montessori.

Change the school boundary to move the non-immersion students at O'Malley Elementary School to Huffman Elementary School. O'Malley Elementary School becomes an alternative French Immersion School.

Change the school boundary to move the non-immersion students at Government Hill Elementary School to Inlet View Elementary School. Government Hill Elementary School then becomes an alternative Spanish Immersion School.

Upon relocating Rilke Schule Charter School to Lake Otis, declare Abbott Loop Elementary School as excess to the District's needs.

Motion by Kelly Lessens, second by Margo Bellamy.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Carl Jacobs, Kelly Lessens, Dora Wilson

Nay: Dave Donley, Pat Higgins, Andy Holleman

§

Received in the Alaska Trial Courts on 04/15/2026.

EXHIBIT G

Collected Statements from Anchorage School District Board Members and Anchorage Assembly Members Demonstrating a Rushed Process and Lack of Public Notice

The following are true and accurate excerpts from publicly available recordings of official meetings. Each excerpt is identified by meeting date, body, and timestamp for verification.

1. Meeting: Anchorage School Board Regular Meeting

Date: February 9, 2026

Source: <https://www.youtube.com/watch?v=qbTK9ycRthk>

- **Timestamp:** [02:27:22]

Speaker: Pat Higgins, School Board Member

Quote: “You want the information on cost savings and finances and how it works for different ones next week. In the past, we’ve had information to board giving us numbers and the numbers didn’t include everything from my standpoint. You know we had special programs being moved. [...] We got increased cost of the transportation. We got cost of facility accommodations when we moved special ed. I want an accurate figure. When I try to look at one time where we had a cost estimate where they had not included it, I got blocked by the administration. [...] I don’t want to get information that supports it without getting all the information. And I don’t see how they can give us an estimate next week from the past how long it takes to be able to come out and give us accurate figures of where it’s changing. We know there’s a lot of finances with it and in some cases with these estimates, you don’t get the savings. [...] are you maintaining that within a week you’re going to be able to determine and give us reasonably accurate figures on the costs associated with all of these things that take place in that period of time? [...] I would like to know from the administration the timeframe necessary to be able to provide us reasonably accurate [...] number for how much we are going to save and recognize the cost associated with it?”

2. Meeting: Anchorage School Board Regular Meeting

Date: February 17, 2026

Source: <https://www.youtube.com/watch?v=j5WVttDC-tA&t=5716s>

- **Timestamp:** [01:33:35]

Speaker: Dave Donley, School Board Member

Quote: “When we first started dealing with school closures, we went to those schools.”

We had meetings at those schools and spent a lot of time, and there was full community recognition of what was happening, and to have this happen in just a couple, three weeks is just, it just doesn't seem to be right to me."

3. Meeting: Anchorage School Board Special Meeting

Date: February 24, 2026

Source: <https://www.youtube.com/watch?v=7bliJNB8OoM&t=8084s>

- **Timestamp:** [00:08:44]
Speaker: Pat Higgins, School Board Member
Quote: "These issues cannot be fully addressed tonight. [...] Three days to provide the recommendations [...] It's not fully possible to assess all the options and impacts in such a short period. The final decision on rightsizing will impact students, parents, staff, and the Anchorage community as a whole. There's been raised a number of concerns within our board and the general community regarding the information and the accuracy of some information. [...] To fairly address all of these issues that have been raised regarding rightsizing, I believe we need to fully explain the goals of rightsizing to the community and to explore the options to achieve these goals. Then generate a list of options and recommendations with advantages and disadvantages to the Board. [...] They [public] need to be heard. We've got a lot of attendance here because it means a lot and we haven't provided the details that they need to be supportive of any decision, and I believe a further review of this with the community may result in options that we have not explored. So I believe it's a benefit for everyone, and I'm asking that we postpone it till April 21 agenda. That gives time for the administration, benefits committee to work together to achieve this goal."
- **Timestamp:** [00:14:55]
Speaker: Andy Holleman, School Board Member
Quote: "But I would like to see it delayed. Particularly the part about school closures. Particularly given that people involved with Campbell Elementary have had such a short time to respond at all. And there's been limited time for the Board to truly study all of the options in this. I would support delaying it."
- **Timestamp:** [00:16:40]
Speaker: Dave Donley, School Board Member
Quote: "I think a delay of the rightsizing proposal that would close down these three schools is a very appropriate and the right thing to do at this time. I have very serious additional concerns about the legality of the lack of notice that was provided to the

community. Friday notice over a three day weekend where we came back on Tuesday and took public testimony. That's just not adequate. And there was no notice provided to the community councils that are in the jurisdiction areas of these schools. And under municipal ordinance, there is a requirement of notice to community councils that I believe could very easily be found by a judge to include the notice that's required here. If you look at the things the ordinance says you have to provide notice of, they include things that are very significantly impacted by the closure of a school in those neighborhoods and those area, those community councils. I don't think it's right deny them a fair opportunity to assess and reply to these proposals which they did not get. So on those basis, I do think it's absolutely appropriate to delay consideration at this time."

- **Timestamp:** [00:36:41]

Speaker: Dave Donley, School Board Member

Quote: "I'm just very, very concerned that we're in a very, very legally questionable area here. Because we're supposed to follow municipal law and I don't know if, I think there's a strong case that we're not. And I'm very concerned about that."

- **Timestamp:** [01:33:27]

Speaker: Dave Donley, School Board Member

Quote: "Campbell STEM community had no notice of this until the Friday before a three day weekend and had very little time to prepare testimony or even learn about it prior to our meeting last week where we accepted public testimony on the subject. I think that's really not appropriate for deciding the closure of a school to have that little opportunity for public review and consideration. I continue to remain extremely concerned about the failure to notify the Taku Community Council of this action. They actually had their meeting the Thursday before the Friday of notice was provided. And they didn't have another meeting scheduled until after this meeting. So they were completely preempted from any notice or opportunity to act or to provide counsel to the board regarding the impacts of this potential closure."

- **Timestamp:** [01:41:26]

Speaker: Andy Holleman, School Board Member

Quote: "We've all watched the process we've gone through in every other case where we've considered closing a neighborhood school and it's been relatively extensive. There have been meetings at the schools. There's been evening opportunities for people to turn out and a number of opportunities to speak to the board, to email the board. [...] We are simply skipping all that in regards to Campbell Elementary. There's no question that when we've taken the time to give people a chance to respond or gone and visited, we learned things and there simply has not been time for that to happen in the case of

Campbell. [...] we need to take more time. If there was anything about a hallmark of closing Abbott Loop as a neighborhood school, it was that it was the one we did that year. It was done with a lot of preparation. It was done knowing where students would go and working with those schools to have a positive reception and the feedback from people a year after was surprisingly positive. But I don't think we're in a position to do all that leg work and make that happen. [...] I will support the amendment and not support closing Campbell."

- **Timestamp:** [01:53:56]

Speaker: Pat Higgins, School Board Member

Quote: "This one [Campbell STEM] is the most disturbing of all. It's a rush decision."

- **Timestamp:** [01:57:22]

Speaker: Pat Higgins, School Board Member

Quote: "This this is just a rush decision, impossible time frame for Mr. Anderson to look at all the different possibilities out there and this one hurts the community and we have other options out there but the biggest issue I'll throw out is we talk about maintenance as an issue. We asked the voters to approve a bond I believe right you know for to fix up the school and part of the explanation of picking the school is we can give that to someone else and take it away from that location. [...] So I strongly urge this one was a rushed decision. [...] there are some other issues out there with this and this would be a rush decision, long-term consequences, and I think it would be bad for kids and bad for the community.

- **Timestamp:** [02:11:30]

Speaker: Pat Higgins, School Board Member

Quote: "This one, if it had more time, I don't think it would have been chosen, but it definitely isn't the process we would like to see because it was so rushed and it's brand new. I think it's a disservice to the community and I think the fact that they voted funds to go ahead and address the maintenance issues should not be held against them that it hasn't been done yet."

4. Meeting: Anchorage School Board Regular Meeting

Date: March 17, 2026

Source: <https://www.youtube.com/watch?v=a63rlglAmL8>

- **Timestamp:** [00:18:53]

Speaker: Dave Donley, School Board Member and Dr. Jharrett Bryantt, Superintendent

Quotes:

- **Donley** “I just want to confirm something that we had discussed earlier and that’s we don’t have a written legal opinion on this subject yet [Tunley Supreme Court decision]”
 - **Dr. Bryantt** “That is correct Member Donley. School board members were given a briefing and I do not have a written legal proposal or legal analysis at this time.”
- **Timestamp:** [02:40:30]
Speaker: Dave Donley, School Board Member
Quote: “We've heard from dozens and dozens of community members about the significant impact of the board's decision to close Campbell STEM. I think there was new information that I wasn't aware of tonight regarding an outstanding significant grant from the private sector to Campbell STEM. [...] that was I think a very significant fact that lends to the reconsideration of the eventual decision here.”
- **Timestamp:** [02:42:21]
Speaker: Pat Higgins, School Board Member
Quote: “I heard information. I went Campbell and visited the school and I learned information tonight that I didn’t know that I think the administration should have provided us anyway. And so this is additional data that it’s just got to get a balanced review of the pros and cons for these various decisions. [...] and we can do something constructive tonight to at least acknowledge that this process was not open for the public at all. This was a decision well in advance, and it just doesn’t come across that way. [...] We didn’t have all the information and what we’re asking for is to have that reconsideration.”
- **Timestamp:** [02:46:54]
Speaker: Andy Holleman, School Board Member
Quote: “Clearly the way that the process was handled with Campbell was different than what we had done with other schools. That in and of itself is enough to where we should take a step back, I think, and look at it again.”
- **Timestamp:** [03:38:21]
Speaker: Pat Higgins, School Board Member
Quote: “I don’t have all the information being given to me by the administration and I am more than frustrated [...] I have been blocked by talking to staff in past by this superintendent. [...] We do not have the oversight for operational audits that we used to have.”
- **Timestamp:** [03:49:53]
Speaker: Pat Higgins, School Board Member
Quote: “I voted against closing Lake Otis and Campbell STEM because I think they were the wrong schools to close. And also because of the lack of reasonable notice. I believe

this was not reasonable notice and I find it hard to believe any court will agree it was reasonable notice also.

5. Meeting: Joint Anchorage School Board - Assembly Meeting

Date: March 20, 2026

Source: <https://www.youtube.com/watch?v=akBFjKqBv0Q&t=6354s>

- **Timestamp:** [01:45:52]
Speakers: Erin Baldwin Day, Anchorage Assembly Member
Quote: "And one of the things that does concern me is the what felt like a last minute move to add Campbell to the list of school closures. I personally feel that that is a shortsighted decision. I believe that it is incongruent with district priorities and outcomes, the things we've said that we value in our education system here."
 - **Timestamp:** [01:55:28]
Speakers: Dave Donley, School Board Member
Quote: "I also think [...] there's a real reasonable possibility that the Supreme Court's not going to agree with this. We know five days is not enough notice. That's by case law. This is only 11 days, and three of those days were over a holiday weekend. I think given the significance of the impact upon this community, this neighborhood, and these children, [...] I don't feel so confident the Supreme Court to say this is appropriate at all. And so, I do think there's a severe infirmity with the process that was used in this decision making."
 - **Timestamp:** [01:58:35]
Speakers: Daniel Volland, Anchorage Assembly Member
Quote: "I also echo Member Baldwin Day's concerns and Mr. Higgin's concerns around maybe a public process that was perhaps a bit too expedited."
-

6. Meeting: Anchorage Assembly Meeting

Date: March 24, 2026

Source: <https://www.youtube.com/watch?v=hoQcHBXGmmY&t=18775s>

- **Timestamp:** [04:08:14]
Speaker: Daniel Volland, Anchorage Assembly Member
Quote: "The toughest part [...] is losing the only STEM school in Alaska and knowing that it would be quite a process to bring something like that back in the future [...] I would

respectfully submit that 11 days does not create clarity, nor is it kind [...] we can have a more robust public process when school closures are being considered.”

EXHIBIT H

Collected Statements from the Anchorage School District Administration Demonstrating a Rushed Process

The following are true and accurate excerpts from publicly available recordings of official meetings. Each excerpt is identified by meeting date, body, and timestamp for verification.

1. Meeting: Anchorage School Board Regular Meeting

Date: February 9, 2026

Source: <https://www.youtube.com/watch?v=qbTK9ycRthk>

- **Timestamp:** [02:30:02]
Speaker: Dr. Jharrett Bryantt, Superintendent
Quote: “One of the reasons I assume that number one is part of this resolution is because the board recognizes that this is an urgent situation and expediency means that we need to lean heavily on analysis that was done over many months. So, the upside of allowing the administration to look at previous analyses is that we would be most confident of those two buildings [Fire Lake and Lake Otis] of any we were to analyze.”
 - **Timestamp:** [02:31:39]
Speaker: Dr. Jharrett Bryantt, Superintendent
Quote: “Part of the reason why number one of this what would be resolved in this resolution would be for the administration to lean into previous research that we did in fall 2025 [...] In which case we would feel fairly confident that we would know many of the logistical pieces of a successful school consolidation. Which is everything from transportation to new boundaries to how services would be consolidated between schools, receiving schools. I highly recommend that if the district were to consolidate school buildings within this current fiscal year going into next year, that we do lean on previous analyses. **The feasibility of producing new schools for consideration would be very difficult and would highly increase the risk to the school board. So I do want to be clear about what is feasible and practical in the very condensed timeline we are operating in.**”
-

2. Meeting: Anchorage School Board Work Session

Date: February 17, 2026

Source: <https://www.youtube.com/watch?v=JlAyj6BXSA>

- **Timestamp:** [01:09:20]
Speaker: Jim Anderson, Chief Financial Officer
Quote: "I think the board recognized that it was incredibly short notice to do a full analysis. So we did reach into everything we had looked at before."
- **Timestamp:** [01:10:40]
Speaker: Jim Anderson, Chief Financial Officer
Quote: "One of our Board Members mentioned, 14 schools I think it was that had some type of school within a school. We couldn't do a deep dive on 14 schools because it would take weeks."
- **Timestamp:** [01:31:02]
Speaker: Sven Gustafson, Deputy Superintendent
Quote: "Have haven't done that detailed analysis on this because we had three days to do all this and that is probably over a day of just somebody working on that because you have to look at specific classes the neighborhood kids come out of, and where they go and all that kind of stuff"
- **Timestamp:** [01:48:06]
Speaker: Jim Anderson, Chief Financial Officer
Quote: "In three and a half days we did not come up with a plan to move [Board Member Higgins: "I agree"] the education center and do a full analysis of the secondary schools and all of those challenges. Those really are a long-term public discussion."

3. Meeting: Anchorage School Board Regular Meeting

Date: February 17, 2026

Source: <https://www.youtube.com/watch?v=j5WVttDC-tA&t=5716s>

- **Timestamp:** [00:09:55]
Speaker: Dr. Jharrett Bryantt, Superintendent
Quote: "The resolution asked the administration to reexamine prior analyses using the most current information available including on academic impacts, enrollment trends, transportation logistics, service levels, long term financial sustainability and more. So, the four days that followed that resolution passing, we completed that review. Now, with that said, it was a very compressed timeline. And it was also consistent with the Board's direction and the budget development calendar."
- **Timestamp:** [00:39:45]
Speaker: Jim Anderson, Chief Financial Officer

Quote: “And that was to make sure we had the most current information available knowing that we a very short and condensed timeline to look at additional near-term efficiency opportunities. And of course they wanted to see how the facilities would be repurposed.”

4. Meeting: Anchorage School Board Special Meeting

Date: February 24, 2026

Source: <https://www.youtube.com/watch?v=7bliJNB8OoM&t=8084s>

- **Timestamp:** [02:08:48]
Speaker: Jim Anderson, Chief Financial Officer
Quote: “In three and a half days you can't do a district-wide thorough assessment of 91 buildings. You can't.”
-

5. Meeting: Anchorage Assembly Meeting

Date: March 24, 2026

Source: <https://www.youtube.com/watch?v=hoQcHBXGmmY&t=18775s>

- **Timestamp:** [03:54:11]
Speaker: Dr. Jharrett Bryantt, Superintendent
Quote: “The school board [...] directed [the District] to work with the community on a [future] long-range process to engage the community and ensure that school consolidation proposals are thoughtful and grounded in community input [...].”

School Board Meeting (Tuesday, March 17, 2026)

Generated by America Sullivan on Wednesday, March 18, 2026

The official record and details of this meeting can be found on the [ASD YouTube Channel HERE](#).

A. Regular Session

Procedural: 1. Call to Order / Roll Call / Flag Salute

Meeting called to order at 6:11 PM

Members present

Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Procedural: 2. Land Acknowledgment / Opening Statement

Madison Arreaola, Student Representative, spoke.

Action: 3. Approval of Agenda

To approve the agenda.

Motion by Margo Bellamy, second by Kelly Lessens.

I move to suspend the rules to have the Superintendent give his report before approval of the agenda to address concerns raised with the insufficient public notice of the Board's actions in closing Campbell STEM, Lake Otis and Fire Lake Elementary Schools.

Motion by Dave Donley, second by Pat Higgins.

Motion Passes

Yea: Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Nay: Margo Bellamy

Move to substitute the main motion with:

Move to suspend the rules to require the ASD Superintendent to address any questions regarding the consolidation process during the superintendent update, when and where it is placed on the 3.17.2026 agenda.

Motion by Carl Jacobs, second by Margo Bellamy.

Motion Fails

Yea: Margo Bellamy, Carl Jacobs

Nay: Dave Donley, Pat Higgins, Kelly Lessens, Andy Holleman

I move to amend the agenda to move public comments to before item C. Goals and Guardrails Monitoring.

Motion by Dave Donley, second by Pat Higgins.

Motion Fails

Yea: Dave Donley, Pat Higgins, Andy Holleman

Nay: Margo Bellamy, Carl Jacobs, Kelly Lessens

To approve the agenda.

Motion by Margo Bellamy, second by Kelly Lessens.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Nay: Dave Donley

B. Reports

Report: 1. Student Representative Report

Madison Arreaola, Student Representative, spoke.

Information: 2. Military Report

Report: 3. Board Conference and Committee Reports

C. Goals & Guardrails Monitoring

Report: 1. Math Proficiency - Student Achievement, Grades 3-8 MAP Growth Assessment

Dr. Jharrett Bryantt, Superintendent, spoke.

Chris Opitz, Sr. Director Assessment & Evaluation, spoke.

Pamela Momany, Sr. Director Special Ed Instruction, spoke.

Received in the Alaska Trial Courts on 04/15/2026.

Nicole Sommerville, Director Elementary Teaching & Learning
 Bobbi Lafferty, Director Fed Program English Language Learner
 Joe Zawodny, Sr. Director Middle School Education

Information: 2. Reading Proficiency - Student Achievement, Grades K-2 mCLASS DIBELS 8 - Technical Report

Dr. Jharrett Bryantt, Superintendent, spoke.

D. Public Comment (1-Hour Time Limit)

Information: 1. Student Comment

I move to suspend the rules to allow the Superintendent and Board Members to respond to questions from the public during the public comment period.

Motion by: Dave Donley

No Second

Clara Ward spoke on Campbell STEM Elementary.
 Hannah Wegner spoke on Campbell STEM Elementary.
 Dena Wegner spoke on Campbell STEM Elementary.
 Julianna Ballou spoke on Campbell STEM Elementary.
 Eli Robinson spoke on Campbell STEM Elementary.
 Islay McDonald spoke on Campbell STEM Elementary.

Information: 2. Public Comment

Chanti Ward spoke on Campbell STEM Elementary.
 Carmen Wegner spoke on Campbell STEM Elementary.
 Haim Wegner spoke on Campbell STEM Elementary.
 Jackie Ballou spoke on Campbell STEM Elementary.
 Herb Ballou spoke on Campbell STEM Elementary.
 Jeanne Robinson spoke on Campbell STEM Elementary.

William Baxter spoke on FFA.

Patty Faulkner Hamre spoke on Campbell STEM and O'Malley Elementary.

Amanda Thompson spoke on Campbell STEM Elementary.

Catrina Wolkoff spoke on Campbell STEM Elementary.

Mike Nield spoke on Campbell STEM Elementary.

Sarah Sundberg spoke on Campbell STEM Elementary.

Virginia Gates spoke on Campbell STEM Elementary.

Renee Helie spoke on Campbell STEM Elementary.

Brittane Harris spoke on Campbell STEM Elementary.

Bradley Kalb spoke on Campbell STEM Elementary.

Kristine Kalb spoke on Campbell STEM Elementary.

Paul McDonogh spoke on ASD Memorandum #134 - Renaming Nunaka Valley Elementary.

Jordan Wood spoke on Campbell STEM Elementary.

Imre Manyoky spoke on education.

Ethan Hoyer spoke on Campbell STEM Elementary.

Cameron Hoyer spoke on Campbell STEM Elementary.

Brandy Kasteloot spoke on Lake Otis Elementary.

Shannon Bulau spoke on Lake Otis Elementary.

Sydney Bidwell spoke on Artificial Intelligence.

Zachary Erhart spoke on bond funding and school closures.

Maxim Ishchuk spoke on Artificial Intelligence.

Rachel Gage spoke on Fire Lake Elementary.

Terri Wood spoke on Campbell STEM Elementary.

Linda Brooks spoke on Campbell STEM Elementary.

Verena Gill spoke on rightsizing.

Philana Miles spoke on rightsizing.

Rob McDonald spoke on Campbell STEM Elementary.

Information: 3. Written Public Comment

E. Consent Agenda

Action (Consent): 1. Voting on Consent Agenda

Andy Ratliff, Chief Financial Officer, spoke.

Resolution: To Approve the Consent Agenda, As Presented.

I motion to suspend the Robert's Rules to reconsider the decision to close Campbell STEM Elementary School.

Motion by Dave Donley, second by Pat Higgins.

I motion to rescind the decision to close Campbell STEM Elementary School.

Motion by Dave Donley, second by Pat Higgins.

Motion Fails

Yea: Dave Donley, Pat Higgins, Andy Holleman

Nay: Margo Bellamy, Carl Jacobs, Kelly Lessens

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent), Report: 2. Acceptance of Math Proficiency - Student Achievement, Grades 3-8 MAP Growth Assessment

Resolution: To accept the Math Proficiency - Student Achievement, Grades 3-8 MAP Growth Assessment report.

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent): 3. Acceptance of CCL - Pathway Concentrators Grade 12

Resolution: To accept the CCL - Pathway Concentrators Grade 12 report.

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent): 4. Acceptance of Guardrail #2: Culturally Diverse Workforce

Resolution: To accept Guardrail #2: Culturally Diverse Workforce.

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent), Minutes: 5. February 9, 2026 Special Meeting Minutes

Resolution: To approve the February 9, 2026 Special Meeting Minutes.

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent), Minutes: 6. February 17, 2026 Regular Meeting Minutes

Resolution: To approve the February 17, 2026 Regular Meeting Minutes.

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent), Minutes: 7. February 24, 2026 Special Meeting Minutes

Resolution: To approve the February 24, 2026 Special Meeting Minutes.

To Approve the Consent Agenda, As Presented.

Received in the Alaska Trial Courts on 04/15/2026.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent): 8. ASD Memorandum #132 - Acceptance of Grant Award: Hazard Mitigation Grant Program - Ptarmigan Elementary School Generator Replacement

Resolution: To accept a grant from the Federal Emergency Management Agency (FEMA), Hazard Mitigation Grant Program (HMGP), for a total amount of approximately \$941,010 to furnish and install a replacement generator at Ptarmigan Elementary School.

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent): 9. ASD Memorandum #135 - Personnel Report

Resolution: It is the administration's recommendation that the School Board approve the attached Personnel Report.

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action (Consent): 10. ASD Memorandum #138 - Allocation of Major Maintenance Capital Improvement Grant, FEMA Reimbursement and Impact Aid Funds for Maintenance and Capital Projects

Resolution: To authorize the transfer and allocation of up to \$4.68 million of State of Alaska Department of Education Capital Improvement Major Maintenance Grant, Impact Aid and redirection of bond funds for planning, design and construction of maintenance and capital projects across the District. The Administration also recommends to modify the fund source allocation of two projects from ASD Memorandum #116 (2025-2026) from Major Maintenance Grant Funds to Federal Impact Aid in the amount of \$650,000.

To Approve the Consent Agenda, As Presented.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

F. Action Items

Action: 1. ASD Memorandum #143 - Adoption of Tentative Agreement: Teamsters Local 959, Bus Drivers & Attendant Employees

To adopt the Tentative Agreement between the District and Teamsters Local 959, representing Bus Drivers and Attendants, which will establish terms and conditions of employment for individuals in this unit during the period between July 1, 2025, and June 30, 2028.

Motion by Margo Bellamy, second by Andy Holleman.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Pat Higgins, Carl Jacobs, Kelly Lessens, Andy Holleman

Action: 2. ASD Memorandum #142 - Approval of Transfer for Rightsizing Moving Costs

Sven Gustafson, Deputy Superintendent, spoke.

Jim Anderson, Chief Operating Officer, spoke.

To approve a \$253,420 transfer to support the moving costs from rightsizing.

Motion by Margo Bellamy, second by Andy Holleman.

I move to postpone ASD Memorandum #142 - Approval of Transfer for Rightsizing Moving Costs to our next meeting on April 6, 2026.

Motion by Carl Jacobs, second by Andy Holleman.

Received in the Alaska Trial Courts on 04/15/2026.

Final Resolution: Motion Passes

Yea: Margo Bellamy, Dave Donley, Carl Jacobs, Kelly Lessens, Andy Holleman

Nay: Pat Higgins

Received in the Alaska Trial Courts on 04/15/2026.

G. Non-Action Items

Information: 1. ASD Memorandum #117 - Approval of Ursa Major Elementary School 35% Schematic Design and Supplemental Education Specifications

Information: 2. ASD Memorandum #133 - Sale of Surplus Property March 2026

Information: 3. ASD Memorandum #134 - Approval of School Name Change for Nunaka Valley Elementary

Information, Report: 4. ASD Memorandum #136 - Contract Modification/Amendment Report for the Month of February 2026 (Information Only)

Information: 5. ASD Memorandum #140 - Approval of Revised ASD School Calendars for Years 2026-27, 2027-28, and 2028-29

Information: 6. ASD Memorandum #141 - TCI Social Studies Curriculum Materials Purchase

H. Continued Public Comment on Non-Agenda and Non-Action Items

I. Superintendent Update

Report: 1. Superintendent Update

Dr. Jharrett Bryantt, Superintendent, spoke.

Jim Anderson, Chief Operating Officer, spoke.

J. School Board & Administration Comments/Communications

Information: 1. School Board and Administration Comments

I motion to adjourn before School Board and Administration Comments.

Motion by Margo Bellamy, second by Carl Jacobs.

Final Resolution: Motion Fails

Yea: Margo Bellamy, Kelly Lessens, Carl Jacobs

Nay: Pat Higgins, Andy Holleman, Dave Donley

Report: 2. Community Outreach - Written Reports

K. Adjournment

Procedural: 1. Adjournment

Motion to adjourn by Member Holleman, second by Member Lessens

Adjourned at 10:06 PM.

EXHIBIT J**Collected Statements Justifying Reasons for Closure of Campbell STEM Elementary**

The following are true and accurate excerpts from publicly available recordings of official meetings. Each excerpt is identified by meeting date, body, and timestamp for verification.

1. Meeting: Anchorage School Board Work Session

Date: February 17, 2026

Source: <https://www.youtube.com/watch?v=JlAyj6BXSA>

- **Timestamp:** [01:18:49]

Speaker: Sven Gustafson, Deputy Superintendent

Quote: “Campbell came onto this list and they haven’t been on the list yet. This is the first time. Campbell’s had a lot of mechanical issues this year. To the tune of missing 5 school days because of either sewage backing up into the school, sewage lines frozen, boilers not working, heat not working, HVAC systems. So Campbell kinda got our attention this year. There’s currently a capital project slated to go on at Campbell. It does not include the sewer. That was, that’s new. Closing Campbell will save \$9 million in bond funds that can be utilized in other capital projects. And then it also has \$2.2 million from that project that is school bond debt reimbursement.”

2. Meeting: Anchorage School Board Regular Meeting

Date: February 17, 2026

Source: <https://www.youtube.com/watch?v=j5WVttDC-tA&t=5716s>

- **Timestamp:** [00:46:49]

Speaker: Sven Gustafson, Deputy Superintendent

Quote: “This is a new school [Campbell STEM] on the list. [...] There’s a capital project currently on deck for Campbell STEM of just about \$11.2 million dollars. \$9 million dollars of that is bond. And \$2.2 million dollars with school bond debt reimbursement that is fungible that’s able to be used for other things”

3. Meeting: Anchorage School Board Special Meeting

Date: February 24, 2026

Source: <https://www.youtube.com/watch?v=7bliJNB8OoM&t=8084s>

- **Timestamp:** [01:50:40]
Speaker: Jim Anderson, Chief Financial Officer
Quote: “The SPDR [School Bond Debt Reimbursement] which provided flexibility for the board which was a criteria that we were asked to look at, certainly gave the board more options to undo some of the other absolutely painful cuts that we put in this budget. And so, if the intent is to provide flexibility to the board, this one did provide that best flexibility.
- **Timestamp:** [02:06:35]
Speaker: Jim Anderson, Chief Financial Officer
Quote: “I would shy away from trying to pick a school purely off of deferred maintenance unless it's got some structural issue that would require that school to be demoed.

4. Meeting: Joint Anchorage School Board - Assembly Meeting

Date: March 20, 2026

Source: <https://www.youtube.com/watch?v=akBFjKqBv0Q&t=6354s>

- **Timestamp:** [02:03:12]
Speaker: Dr. Jharrett Bryantt, Superintendent
Quote: “So when it comes to why was one particular school put on a list, the harsh reality is that it could have been a number of different facilities and part of the ongoing discussion between the school district, the school board and the community is which school to select and that is an extremely difficult process and it was extremely difficult for this process as well. We were certainly able to go into the factors that made Campbell an eligible school, but to suggest that it was the only school that could have been considered is not accurate because we've lost so many students. There are many schools that could be and have been considered by this board. With that said, we were asked to put together a proposal in less than two weeks. [...] In this particular proposal it was accepted”

5. Meeting: Anchorage Assembly Meeting

Date: March 24, 2026

Source: <https://www.youtube.com/watch?v=hoQcHBXGmmY&t=18775s>

- **Timestamp:** [04:12:57 - 04:29:19]
Speaker: Jared Goecker, Anchorage Assembly Member and Dr. Jharrett Bryantt,

Superintendent

Quotes:

- **Goecker [04:12:57]** “I did not actually hear the points of data to decide why Campbell STEM was selected for closure. [...] Quantify this for me. Help me understand. This doesn’t make any sense.”
- **Dr. Bryantt [04:13:12]** “[...] So this process of consolidating schools or rightsizing schools has been taking place not just this year, but frankly for the past four years. [...] back in, I believe 2023 [...] we spent about six months working with the board and collecting input from the community on some sort of framework for how one would pursue [...] selecting from [...] over 94 schools, a list to move forward to a school board to select for consolidation. And through that process we received [...] some of the metrics that the school board adopted that particular year that have set a framework for subsequent conversations are a number of things. One of which should be utilization within an area, [...] transportation service is another thing that's considered. Another thing that was on our criteria that we developed that particular year was on community growth [...] A big piece is facility condition and I think that's the one that played a prominent role in this situation [...] one thing that does make Campbell stand out or a couple of things. It was mentioned that there are fungible dollars that are through the school bond debt reimbursement program that are fixed to Campbell STEM. That is something that was taken into consideration as the directive from the school board was to find efficiencies that could generate short term dollars. [...] The second one would be around how do we [...] try to bring back as many fungible dollars to the district as possible so that we can move services forward for an additional school year. [...] I think we have to separate the program from the facility. So Campbell is the [...] only school [...] this year that was closed more than one time due to severe winter conditions. There was a sewer line that was frozen and something that doesn't get often talked about in these technical conversations is that that specific issue with the facility was not [...] incorporated in the bond that we're talking about for Campbell STEM. And then there there's additional work that needs to be done in the school. So even though there was a recent roof project, in my most recent visit to Campbell, [...] I did notice that there was a bucket to collect water droplets at the very front of the school. [...]”
- **Goecker [04:24:17]** “[...] What is considered underutilized, like what's the percentage threshold there?”
- **Dr. Bryantt [04:24:29]** “[...] it's very nuanced. I wish I could just tell you if it's fifty and below, you're on the list. If it's fifty or more, you're not, but it's more

complicated than that, [...] sometimes you'll have as many as four to five schools within a five mile radius. So even if one school may be utilized if that school were to be consolidated in the others. They'll be much better utilized. [...]"

- **Goecker [04:25:46]** "[...] Campbell STEM I think was at 72% enrollment. That doesn't seem underutilized to me, and I know that you mentioned infrastructure. [...] there was bonds in the most recent years for it and [...] we're taking that money now and we're moving it towards other projects and that's what you said was actually one of the driving factors for it. [...] How would you say that it's weighted? You know you listed utilization, transportation, community growth, facility condition. How are those weighted amongst themselves?"
- **Dr. Bryantt [04:26:35]** "It depends on the context, and [...] the last point that I wanted to make, [...] when we developed that initial criteria several years ago, each one was a fixed a point system. [...] I'm happy to provide that, but I don't want to misspeak on what got what number of points."

EXHIBIT K**Collected Statements Contradicting the Stated Basis for the Decision**

The following are true and accurate excerpts from publicly available recordings of official meetings. Each excerpt is identified by meeting date, body, and timestamp for verification.

1. Meeting: Anchorage School Board Regular Meeting

Date: February 17, 2026

Source: <https://www.youtube.com/watch?v=j5WVttDC-tA&t=5716s>

- **Timestamp:** [00:57:25]

Speaker: Pat Higgins, School Board Member

Quote: "I listen to the money reason with Campbell. [...] We have over a billion dollars of deferred maintenance in the school district and this one comes out if you divide the number of schools right at the right amount. The average amount that's out there for deferred maintenance, I believe, in the \$11 to \$12 million dollars. So all the other schools out there are averaging the same thing that Campbell is being targeted for in regards to it."

2. Meeting: Anchorage School Board Special Meeting

Date: February 24, 2026

Source: <https://www.youtube.com/watch?v=7bliJNB8OoM&t=8084s>

- **Timestamp:** [00:27:21]

Speaker: Pat Higgins, School Board Member

Quote: "I think the first comment I want to make is when we talk about this just based upon finances, \$2.6 million is not an accurate figure and the administration admitted it. We've got 100 people on a waiting list for Eagle Academy, go to Fire Lake. They add that, that's over a million dollar reduction to the operational money that we have which is with them. They can go much higher than that. And, in fact, if they reach the limits where they're at, we'd be at a negative. And then, in six years, it goes from \$2.6 [million] to \$153,000. So this is not a long-term financial plan. It needs to be because we can teach kids better, we can help them academically. If it's a financial thing, I think it's a disaster cause that's not going to work out. But we do need to look at, is it going to favorably impact programs? Can we deliver things better?"

- **Timestamp:** [00:29:58]

Speaker: Pat Higgins, School Board Member

Quote: “I think we’ve got strong concerns that it’s not going to help us academically. So I’m not going to put it as a financial issue. [...] this is not going to make or break us on the budget when you got a \$90 million deficit, and that \$2.6 million, if it’s more than a million I’d be surprised. And in five years it’s going to be a deficit of almost a million or more. I’m sure of that. It just has to be. The math is there. So this is not a financial solution, it’s an operational. [...] Campbell STEM is a great program. It got selected in a rush and you don’t have replacement for it. They’ve got the preschool for the special kids. They’ve got special education programs. It’s occupied. It’s not one of those half empty. It got selected in a rush. It’s unfair.”

- **Timestamp:** [01:34:45]

Speaker: Dave Donley, School Board Member

Quote: “Some of the facts about Campbell STEM that make it particularly inappropriate to close are it is the only STEM certified school in the entire state of Alaska. Campbell is actually nationally recognized as a STEM school. Campbell's reading and math test scores and growth are higher than the ASD average and they're higher than any of the four schools that this is recommending their students would attend next year. Campbell has one of the highest attendance rates in the district. [...] it's about 90% attendance, [...] Anchorage voters approved a bond for the remodeling and renovation of Campbell STEM Elementary just recently. And for the past two summers, millions of dollars have already been spent replacing the entire roof [...] It's a high-performing school. It's got 74% occupancy, which is more than most by far most of the schools in the Anchorage School District. So it's a high-performing, high occupancy, successful school that we're going to do away with. That just seems incredibly illogical to me. And the fact that there's been so little appropriate notice provided to the community and to the community council impacted by this make this a really bad idea. I feel very strongly that this is not the right step at this time. Campbell STEM is simply not the right school and this is not the right time to be closing it for such a relatively small financial advantage that is going to almost completely disappear in five years. The projection for the savings for all three schools after five years is only \$154,000. And that doesn't even count the testimony that we received tonight about the huge the additional increase in that we're going to have to pay in busing to accomplish this. And so the other factor, you know, that's going to affect that total savings projection is the what's going to happen at Eagle Academy with the with their, with the number of students there and the impact that's going to have on our budget also. So, we could end up virtually saving nothing by this very dramatic, significant, and damaging closure of a very successful school in our district. I just don't think this is a good plan. I feel confident this is not the right way forward. And so I would hope that the board would delete the closing of Campbell STEM from this memorandum.

- **Timestamp:** [01:42:28]

Speaker: Andy Holleman, School Board Member

Quote: “The other thing is the program. [...] programs don't just arise in a short period of time. It usually takes a number of people with some dedication working over a period of time, often in excess of everything else they were doing to begin with. I don't know what all the steps are involved in becoming an accredited STEM program at the elementary level, but I'm guessing it's more than filling out a couple of forms and mailing it off to somebody and hoping you get a positive response. [...] we simply pave over really good work that is done at our local buildings rather than recognizing that work and expanding it. If there are other elementary schools that are interested in becoming STEM certified [...] I would think one of the first things they would do is try to find some time to go to Campbell and see what happened and if it's gone obviously they can't do that. The other thing is it becomes a lesson to anybody that is thinking about it. If you see it erased your incentive to try to do it in your own school is simply diminished. [...] I would want to see the whole program moved.”

3. Meeting: Joint Anchorage School Board - Assembly Meeting

Date: March 20, 2026

Source: <https://www.youtube.com/watch?v=akBFjKqBv0Q&t=6354s>

- **Timestamp:** [01:32:39]

Speakers: Pat Higgins, School Board Member and Becky Windt Peason, Municipal Manager

Quotes:

- **Higgins** - “Is that an expectation that if we’re going to give up a property, we have to remove the stuff [Abbott Loop and Campbell STEM building]? Because it was on the bonds at one time [...] it just seems odd to me that we are being asked to remove a building that might have practical use as well as all of everything else, because you might want to build houses there that we should pay to remove the school as proposed by the superintendent and staff to do that. [...]
- **Windt Peason** - “I would say in response to that, municipal code is not very clear on what happens with structures on properties where management authority is transferred. And again, we don’t have a large amount of precedent for this kind of transfer, and [...] there are some restrictions that we’re picking through. This happened quickly too. And so we are also trying to catch up to what kind the funding sources are that went into the buildings that may come back to

municipal management and what that means for what can and cannot happen with buildings and how there are provisions in code regarding what happens [...] So, we are trying to catch up to exactly what the paradigm is, [...] but right now our position is we would anticipate working together with the school district, presuming those two buildings [Campbell STEM and Abbott Loop Elementary] are the desire is to return them to the municipal inventory to assess and chart a path forward with what we do. We've at this point made no concrete plan or request regarding either property because it is a very new prospect.

- **Timestamp:** [01:54:32]

Speaker: Pat Higgins, School Board Member

Quote: "We had all these other schools before that were recommended and not selected and now we've gone out of the way to pick Campbell. None of that has been explained. The public doesn't understand it. I don't understand it and I don't get it."

4. Meeting: Anchorage Assembly Meeting

Date: March 24, 2026

Source: <https://www.youtube.com/watch?v=hoQcHBXGmmY&t=18775s>

- **Timestamp:** [03:43:34]

Speaker: Yarrow Silvers, Anchorage Assembly Member

Quote: "I am [...] deeply disappointed by some of the decisions made [...]. Specifically, I'm concerned with how this administration and school board have chosen to target STEM education, with their last-minute decision to close the only STEM elementary [school] in Alaska. [...] STEM education provides an opportunity for many kids to thrive, including kids who are on the autism spectrum and who struggle in more traditional education settings [...] diversified education models is crucial to ensuring educational equity in special education, and STEM education plays an important role not only in providing an educational opportunity for students on the autism spectrum to thrive but that STEM learning has also expanded future employment opportunities [...] I am deeply disturbed by these last-minute decisions [...]. By cutting STEM [...] we'll be leaving more children to fall through the cracks, we will be failing more kids, we will be removing the opportunity for more kids to thrive, learn, and grow. [...] These last-minute decisions [...] feel shortsighted and [...] will result in loss of opportunity and harmful outcomes to students who need diversified educational models [...]. I urge the District to take more time, thought, and care with these decisions [...] and to support diversified educational models [...] to ensure educational equity."

- **Timestamp:** [04:07:01]

Speaker: Dr. Jharrett Bryantt, Superintendent

Quote: “If Campbell STEM were closed [...], recertification is not an easy or simple process. It requires buy-in of teachers, leadership, and significant commitment [...] it does take a couple of years and requires continuous monitoring and oversight [...]. In terms of cost, it is only several thousand dollars, not an extraordinarily large cost [...] while it is possible to pursue accreditation in the future, it is a multi-year process”

- **Timestamp:** [04:58:00]

Speaker: Erin Baldwin Day, Anchorage Assembly Member

Quote: “when you factor in the increased cost of student transportation, the overall cost savings of the school closure is rather minimal and in the end it's that \$2.2 million of fungible money that makes the juice worth the squeeze. [...] you've put eight years into building a program [...] is not simply going to be duplicated or replicated at the three receiving schools [...] we're making a really significant long term decision for \$2.2 million in one time funding [...] concerned that we are mortgaging an entire program for one time cost savings and we're not going to get that back [...] I cannot in good conscience support a budget that does what we're doing here [...] I'm really struggling with the decision to mortgage an extraordinarily well built program for \$2.2 million in one time funding [...] the process that was taken to close Campbell STEM is not commensurate with the process that was undertaken for every other school closure that we've experienced here. This group of parents and students and administrators and teachers did not have the opportunity to develop a charter school proposal. They did not have an opportunity to try to save themselves because they did not have the days that they were that would be required to do that work. I have no doubt that given the time that is work, that would have been done because any group of parents and administrators and teachers that will band together over the course of eight years to create a program top to bottom would bend over backwards to create a charter school to make sure that that program stayed intact”

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

Plaintiffs:

Campbell STEM Preservation & Education
Foundation, Alaska Corporation

v.

Defendants:

Anchorage School District
and Anchorage School Board

Case No: 3an-26-6081 CI

I, Michael Nield, being first duly sworn, hereby depose and state as follows:

1. I am a parent of two children currently enrolled at Campbell STEM Elementary School ("Campbell STEM") in Anchorage, Alaska. I have personal knowledge of the facts set forth in this affidavit and am competent to testify to them.
2. Both of my children actively participate in the structured STEM curriculum at Campbell STEM, which provides specialized, integrated instruction not available in traditional elementary school settings.
3. One of my children is subject to an Individualized Education Plan (IEP) and has received targeted educational support services through Campbell STEM. As a direct result of this program and the staff implementing it, I have observed measurable improvements in my child's academic abilities, functional skills, and overall educational progress.
4. The relationships between my children and their teachers and support staff are well-established and critical to their continued success, particularly for my child with an IEP, where consistency and continuity of services are essential.
5. On or about February 13, 2026, I became aware of the Anchorage School District's proposed closure of Campbell STEM. This notice was provided immediately prior to a three-day federal holiday weekend, significantly limiting the ability of parents and stakeholders to review, understand, or respond to the proposal.
6. The first public meeting following this announcement occurred on February 17, 2026, at which time the Anchorage School District Board accepted public testimony. However, there was no meaningful public discussion, dialogue, or two-way communication, and stakeholders were not provided an opportunity to engage in substantive review or challenge of the decision-making process.
7. Based on my observations and participation, the information presented by the District appeared incomplete, insufficient, or lacking factual support, particularly with respect to the evaluation and selection of Campbell STEM for closure.

8. I personally observed and/or became aware of public discussions between Anchorage School District Superintendent Dr. Jharrett Bryantt and members of the Municipality of Anchorage Assembly, in which concerns were raised indicating that the process used to select Campbell STEM for closure was flawed and lacked meaningful analysis or discussion.
9. The closure of Campbell STEM will result in immediate and irreparable harm to my children, including but not limited to:
 - o Disruption of established teacher-student relationships;
 - o Loss of continuity in a specialized STEM educational program developed over multiple years;
 - o Academic regression and emotional distress resulting from forced transition.
10. These harms cannot be adequately remedied after the fact, as the loss of instructional continuity, specialized programming, and established educational relationships cannot be replicated within a reasonable timeframe, if at all.
11. I submit this affidavit in support of Plaintiffs' Motion for Temporary Restraining Order, as immediate judicial intervention is necessary to prevent further implementation of the closure and to preserve the status quo pending full review.

I declare under penalty of perjury under the laws of the State of Alaska that the foregoing is true and correct.

DATED this 7 day of April, 2026, at Anchorage, Alaska.

Mike Nield

SUBSCRIBED AND SWORN before me this 7 day of April, 2026.

Jose M. Munoz

Notary Public for Alaska

My Commission Expires: September 11, 2029



AFFIDAVIT OF JEAN-PAUL ROULET II IN SUPPORT OF EXHIBITS

I, Jean-Paul Roulet, being first duly sworn upon oath, hereby depose and state as follows:

• **Affiant**

My name is Jean-Paul Roulet II. I am over the age of eighteen (18) and competent to testify to the matters stated herein. I have personal knowledge of the facts contained in this affidavit.

• **Purpose**

I submit this affidavit in support of materials filed in connection with a Temporary Restraining Order (TRO) proceeding.

• **Exhibits**

Attached hereto are true and correct copies of the following exhibit:

- **Exhibit C:** ASD Resolution #25-26-01(S.1)
- **Exhibit D:** Campbell STEM School Closure Notification

• **Accuracy and Authenticity**

I certify the following:

- **Exhibit C** is the resolution from the Anchorage School District Board directing the Anchorage School District Administration to identify school consolidation and operational efficiency options to preserve and strengthen academic programs. This document is publicly available <https://go.boarddocs.com/ak/asdk12/board.nsf/Public>
- **Exhibit D** is the email notification that was sent by the Anchorage School District Administration to the parents of Campbell STEM Elementary School students.

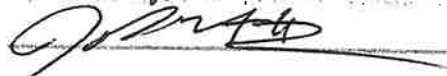
• **Compilation of Materials**

This exhibit was provided by me. I have not knowingly altered or misrepresented the contents of these materials.

• **Oath**

FURTHER AFFIANT SAYETH NAUGHT.

DATED this 9th day of April, 2024, at Anchorage, Alaska.



Jean-Paul Roulet II, Affiant

JURAT (Notary Section - Alaska)

STATE OF ALASKA)

) ss.

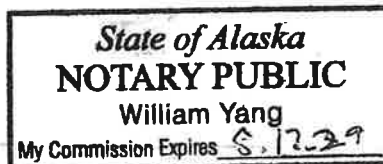
THIRD JUDICIAL DISTRICT.)

SUBSCRIBED AND SWORN to before me this 8th day of April, 2024, by Bradley Kalb.



Notary Public in and for Alaska

My commission expires: 08.12.29



AFFIDAVIT OF BRADLEY KALB IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER

I, Bradley Kalb, being first duly sworn upon oath, hereby depose and state as follows:

1. Identity and Capacity

I am an adult resident of Anchorage, Alaska. I am the parent/legal guardian of two students currently enrolled at Campbell STEM Elementary School ("the School"), which is the subject of the proposed closure at issue in this action.

2. Personal Knowledge

I have personal knowledge of the facts stated in this affidavit and, if called a witness, could and would testify completely to them.

3. Student Enrollment and Impact

My children, AK and PK, are currently enrolled in third and first grade, respectively at the School. The proposed closure would directly and substantially disrupt my child's education, including but not limited to the loss of a high-quality STEM accredited education program, established peer relationships and support systems, and the loss of unique STEM opportunities and specialized staff. This STEM program is the only COGNIA accredited STEM program in the state and is not available at the proposed receiving school. These harms would be immediate and cannot be adequately mitigated.

4. Hardship and Irreparable Harm

The proposed closure would cause immediate and irreparable harm to:

- a. My children, through disruption of educational continuity and access to established STEM programs and support systems; and
- b. The School community

5. Exhibits

Attached hereto are true and correct copies of the following exhibits I have compiled in support of this application:

- o **Exhibit A** – Timeline of Rightsizing Initiatives
- o **Exhibit B** – ASD Rightsizing Presentation, November 4, 2024
- o **Exhibit C** – ASD Resolution #25-26-01(S.1)
- o **Exhibit E** – Meeting minutes from February 17, 2026 School Board Meeting
- o **Exhibit F** – ASD Memorandum #137
- o **Exhibit G** – School Board/Assembly Member Statements Regarding Notice and Process
- o **Exhibit H** - Administration Statements Regarding Timeline and Process
- o **Exhibit I** – ASD Board Meeting Minutes, March 17, 2026
- o **Exhibit J** – Administration Statements Regarding Reasons for Closure
- o **Exhibit K** – Statements Contradicting Reasons for Closure

6. Accuracy and Authenticity

I certify the following:

- o Exhibit A is a fair and accurate compilation of information derived from publicly available agendas and presentations collected between 2022 and 2026.

- Exhibit B is publicly available at [https://go.boarddocs.com/ak/asdk12/Board.nsf/files/DB234V0519E0/\\$file/Final%20ASD%20Rightsizing%20for%2004%20NOV%202024-1.pdf](https://go.boarddocs.com/ak/asdk12/Board.nsf/files/DB234V0519E0/$file/Final%20ASD%20Rightsizing%20for%2004%20NOV%202024-1.pdf).
- Exhibits C, E, and F are publicly available at <https://go.boarddocs.com/ak/asdk12/board.nsf/Public>
- Exhibits G, H, J, and K accurately reflect statements made during the referenced meetings to the best of my knowledge and belief from the from the following meetings: 2/9/26 School Board Regular Meeting, 2/17 School Board Work Session, 2/17/26 School Board Regular Meeting, 2/24 School Board Special Meeting, 3/17 School Board Regular Meeting, 3/20 Joint School Board – Assembly Meeting, and 3/24 Anchorage Assembly Meeting. Video of meetings and transcripts were captured from Anchorage School District YouTube channel (<https://www.youtube.com/@ASDschoools>) and from the Anchorage Assembly YouTube channel (<https://www.youtube.com/@moameetings>)
- Exhibit I is publicly available at <https://go.boarddocs.com/ak/asdk12/board.nsf/Public>

7. Compilation of Materials

These exhibits were compiled by me through review of publicly available records. I have not knowingly altered or misrepresented the contents of these materials.

8. Oath

FURTHER AFFIANT SAYETH NAUGHT.

DATED this 3 day of April, 2026, at Anchorage, Alaska.

Bradley Kalb

Bradley Kalb, Affiant

JURAT (Notary Section – Alaska)

STATE OF ALASKA)

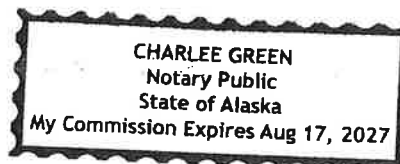
) ss.

THIRD JUDICIAL DISTRICT)

SUBSCRIBED AND SWORN to before me this 3 day of April, 2026, by Bradley Kalb.

[Signature]
Notary Public in and for Alaska

My commission expires: 08/17/2027



**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE**

Plaintiffs:

Campbell STEM Preservation & Education
Foundation, Alaska Corporation

v.

Defendants:

Anchorage School District
and Anchorage School Board

Case No: 3an-26-6081ci

AFFIDAVIT OF M. KENNETH WAKE

I, M. KENNETH WAKE, being first duly sworn, state as follows:

1. I am a Plaintiff in this action and have personally observed and am familiar with the facts set forth herein based on my personal observations, including my presence at Anchorage School District Board and Assembly meetings, as well as my review of publicly available information, District communications, and materials identified in this matter.
2. I submit this Affidavit in support of Plaintiffs' Motion for Temporary Restraining Order. I am also a Director of the Campbell STEM Preservation & Education Foundation, a community-based organization formed to support and advocate for the continuation of Campbell STEM Elementary School, the only nationally certified STEM school in the state.
3. My child is currently enrolled in the Campbell STEM program and actively participates in its structured STEM curriculum which includes (Science, Technology, Engineering, Math) in nearly all aspects of learning. The closure will directly disrupt my child's ongoing educational development, instructional continuity, and access to specialized programming not available at reassigned schools.
4. On Friday, February 13, 2026, at about 4:00pm the Anchorage School District provided public notice identifying Campbell STEM as a proposed school for closure. The notice was issued immediately prior to a three-day holiday weekend, limiting meaningful

7. At no time prior to the vote did the District disclose any scoring methodology, evaluation criteria, comparative ranking of schools, or analysis specific to Campbell STEM's nationally recognized STEM program.
8. Since the vote, the District has begun communications of active implementation of the closure decision. Based on information available to me, these actions include, but are not limited to:
 - a. Reassignment and relocation of school administration and staff;
 - b. Planning and coordination for student transfers to other schools;
 - c. Preparation for movement of classroom materials, equipment, and educational resources;
9. These implementation actions are ongoing and are expected to accelerate in the immediate future.
10. The harm resulting from these actions is immediate. Decisions affecting student placement, staffing, and program continuity are being made now, and will be finalized within days to weeks absent Court intervention.
11. The harm is irreparable. Campbell STEM is the only nationally certified STEM program in the State of Alaska developed over approximately eight years, with established curriculum, infrastructure, and community partnerships that cannot be replicated at another school within the same timeframe or with the same level of integration. If the closure proceeds, students will suffer measurable academic harm, including disruption of program continuity, interruption of skill progression, diminished learning outcomes, and loss of access to specialized STEM instruction and resources necessary for sustained academic development. The closure will also disrupt established student-teacher relationships, peer networks, and the broader school community, all of which are critical components of a child's educational stability and well-being.
12. If the closure proceeds, students will lose access to this unique educational program, and the program itself will be dismantled. Once dismantled, it cannot be restored through later court action.
13. The disruption to students includes loss of program continuity, separation from established educational pathways, loss of access to specialized STEM instruction and resources, and measurable academic harm, including interruption of skill progression,

diminished learning outcomes, regression in subject mastery, and reduced access to advanced, integrated STEM curriculum necessary for sustained academic development.

14. Monetary damages cannot remedy the loss of a unique educational program or the disruption to a child's academic development.

15. Absent immediate injunctive relief, Defendants' continued implementation of the closure will result in permanent and irreversible harm before this Court can fully consider the merits of this case.

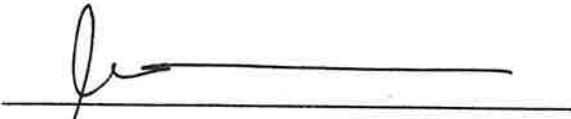
16. For these reasons, immediate relief in the form of a Temporary Restraining Order is necessary to preserve the status quo and prevent irreparable harm, as the injury described herein is immediate and will occur before Defendants can be fully heard in opposition, thereby satisfying the requirements for relief under Alaska Civil Rule 65(b).

17. The preservation of established educational programs and prevention of disruption to students serves the broader public interest in stable and effective public education.

18. I personally verified Campbell STEM Elementary School's national STEM certification by conducting a search through the Cognia website, a recognized accrediting body that identifies accredited and certified institutions. Based on that search, Campbell STEM is listed as a nationally certified STEM program.

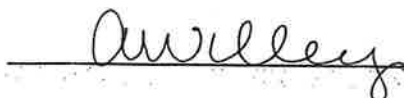
I declare under penalty of perjury under the laws of the State of Alaska that the foregoing is true and correct.

DATED this 8 day of April, 2026, at Anchorage, Alaska.



M Kenneth Wake

SUBSCRIBED AND SWORN before me this 8 day of April, 2026.



Notary Public for Alaska

My Commission Expires: 5/10



DATED this 14th day of April, 2026.

INGALDSON FITZGERALD, P.C.
Attorneys for Plaintiff

/s/Kevin T. Fitzgerald
Kevin T. Fitzgerald
ABA No. 8711085

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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

CAMPBELL STEM PRESERVATION)
& EDUCATION FOUNDATION,)
ALASKA CORPORATION,)

Plaintiff,)

v.)

ANCHORAGE SCHOOL DISTRICT)
and ANCHORAGE SCHOOL BOARD,)

Defendants.)

Case No. 3AN-26-06081 CI

**ORDER GRANTING PLAINTIFF'S EMERGENCY MOTION FOR A
TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION AND
LIMITED EXPEDITED DISCOVERY**

**[PROPOSED] ORDER GRANTING PLANITIFF'S MOTION FOR A TEMPORARY
RETRAINING ORDER AND LIMITED EXPEDITED DISCOVERY**

REQUEST FOR RELIEF

Plaintiffs respectfully request the following relief, as supported by the applicable standards governing temporary restraining orders and preliminary injunctions and as demonstrated above:

1. **Issue a Temporary Restraining Order** immediately enjoining Defendants, the Anchorage School District and the Anchorage School Board, including all officers, agents, employees, and all persons acting in concert with them, from taking any action to implement, advance, or facilitate the closure of Campbell STEM Elementary School;
2. **Issue a Preliminary Injunction** maintaining the status quo and prohibiting any further steps toward closure, consolidation, reassignment of students or staff, repurposing of the facility, or administrative transition of Campbell STEM Elementary School until this Court has fully reviewed and adjudicated the legality of Defendants' action;
3. Order preservation of all funding, staffing, and programmatic elements associated with Campbell STEM Elementary School, including but not limited to:
Retention of current staffing levels and positions

4. Continuation of all educational programming, including the nationally certified STEM program;
5. Preservation of existing student enrollment structures and services;
6. Maintenance of all operational resources necessary to ensure uninterrupted school function;
7. Enjoin Defendants from reallocating, redirecting, encumbering, or otherwise altering the use of voter-approved bond funds associated with Campbell Elementary School, including those authorized under AO 2024-115, pending final resolution of this matter;
8. Order Defendants to preserve all documents, communications, and electronically stored information related to the closure decision, including but not limited to emails, text messages, internal memoranda, financial analyses, meeting materials, and draft reports. Defendants shall certify compliance with such preservation obligations in accordance with Alaska Civil Rules 26 and 37.
9. Prohibit any retaliation, adverse action, or intimidation against any parent, student, staff member, witness, or community participant involved in opposition to the closure or in support of this action, including participation in public testimony or cooperation with Plaintiffs' legal efforts;
10. Declare the closure decision unlawful and invalid upon a finding that the process violated Alaska law, including but not limited to statutory requirements governing public meetings, notice, administrative procedure, and procedural due process;
11. Grant such additional and further relief as the Court deems just and proper, including the authorization of limited expedited discovery to ensure a complete administrative record and meaningful judicial review.

Dated: _____

Judge of the Superior Court

Kevin T. Fitzgerald
Ingaldson Fitzgerald, P.C.
kevin@impc-law.com
Attorney for Plaintiff

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

CAMPBELL STEM PRESERVATION)
& EDUCATION FOUNDATION,)
ALASKA CORPORATION,)

Plaintiffs,)

v.)

ANCHORAGE SCHOOL DISTRICT)
and ANCHORAGE SCHOOL BOARD,)

Defendants.)

Case No. 3AN-26-0608~~2~~¹ CI

**ORDER GRANTING PLAINTIFF'S MOTION FOR A
TEMPORARY RESTRAINING ORDER**

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

Plaintiffs:)
Campbell STEM Preservation & Education)
Foundation, Alaska Corporation)
v.)
)
Defendants:)
Anchorage School District)
and Anchorage School Board)
)
) Case No: _____

[PROPOSED] ORDER GRANTING PLANITIFF’S MOTION FOR A TEMPORARY
RETRAINING ORDER AND LIMITED EXPEDITED DISCOVERY

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9. Grant such additional and further relief as the Court deems just and proper, including the authorization of limited expedited discovery to ensure a complete administrative record and meaningful judicial review.

Dated: _____

Judge of the Superior Court

Received in the Alaska Trial Courts on 04/15/2026.

DATED this _____ day of _____, 2026

Superior Court Judge

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