

1 DECLARATION OF LINDA YOST

2 I, Linda Yost, declare and state:

3 1. I am resident of Visalia, California and teach at Mount Whitney High School in
4 Visalia, California. I make this Declaration based upon personal knowledge and, if called upon to
5 do so, I could and would competently testify to the matters set forth herein.

6 2. I am a credentialed history teacher at Mount Whitney High School. I teach world
7 history and honors world history. World history is a required tenth grade course for all students
8 at Mount Whitney High School.

9 3. There are numerous problems that my students experience at Mount Whitney
10 High, all of which impede their ability to learn and receive a quality education. There is a lack of
11 current textbooks, a lack of adequate classroom space due to our growing student population, a
12 frequent lack of access to the school library, and problems with the centralized air and heating
13 system.

14 4. The textbook situation at Mount Whitney is deplorable. Basically, each year our
15 department looks at various textbooks and decides which books to purchase for our students. The
16 money which is appropriated to our school is allocated by the school principal to the different
17 departments. Normally, the history department does not have enough money to purchase books
18 for every single class due to the fact that our school population is growing every year and a single
19 textbook usually costs at least \$50.00. Our incoming freshman class consisted of over 600
20 students. Because of the high cost of textbooks and the sheer number of students, we are not
21 usually able to purchase all the books we need for our students. This means that some classes are
22 stuck using older editions of textbooks. This is a real problem in world history because many
23 current events are not included in older textbooks due to the fact that they have not yet occurred
24 at the time of the text's publication. For example, the last presidential election was not covered in
25 one of the books my students were using. Having to use outdated books requires me to constantly
26 supplement with other materials, such as notes I have put together or newspaper articles. As a
27 world history teacher, I expect to supplement the text a bit with relevant current events, but
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1 having to supplement the textbook with information that occurred years ago is burdensome and is
2 not fair to the students who ask me why they have to use such old, outdated textbooks.

3 5. Another problem we experience at Mount Whitney with respect to textbooks is the
4 fact that students taking the same subject have different editions of textbooks or different texts
5 entirely because of the shortage of textbooks throughout the school. For example, during the
6 1998-99 school year in my honors classes, some of my students had current textbooks from 1999
7 while other had older editions. The students who were fortunate enough to get the 1999
8 textbooks were not so lucky at the beginning of the year when they did not have a textbook due to
9 the fact that they had not been delivered on time. In fact, we were well into the second month of
10 school before my students got their books. There is an overall lack of consistency with respect to
11 available textbooks, resulting in some students having more current materials and other students
12 in the same grade and the same class having outdated materials. At least in my regular world
13 history classes all of my students had the same textbook. I, however, am one of the more
14 fortunate teachers at Mount Whitney. Other teachers do not have the same resources that I have.

15 6. One of my colleagues who also teaches world history only has one set of textbooks
16 for his class. His students are not even able to take the text home to study it because he does not
17 have enough copies.

18 7. One of the other problems that we are experiencing at Mount Whitney is
19 overcrowding. Last year we had 600 incoming freshmen. There are over 2,000 students in our
20 school, so class space is a constant problem. Not only do we have portable classrooms or
21 "portables", but many teachers "float" meaning they move from one classroom to another to teach
22 their classes because there is not enough building space to accommodate them. A floating teacher
23 used my classroom to teach one of his classes during my preparation period- the period during the
24 day when I am supposed to prepare for my classes without having students around. Having a
25 floater in my class was not only uncomfortable for the floater as he had to lug all of his materials
26 around from classroom to classroom, but a great inconvenience to me as I was displaced from my
27 classroom during the time the floater and his students were in my room as I did not want to
28 disrupt his class by moving about, nor could I concentrate well on my work due to the noise and

1 activity which was going on while the teacher was teaching. Instead of being able to work in my
2 classroom, I would either go to the library, if it was open, or would work in one of the school
3 courtyards.

4 8. Because of the large student population many teachers and students are forced into
5 portable classrooms. The "portables" had been used for so long that many of them were in a
6 shambles and had to be replaced. It was a common know fact that they were in really poor shape.
7 In one of the portables, the floor fell apart and a teacher actually fell through. That portable was
8 replaced after the floor was no longer functional. In another, there were mushrooms and fungus
9 growing inside. These conditions are not safe nor sanitary and students and teachers should not
10 be subjected to teach and learn in such miserable conditions.

11 9. One of our teachers and his students were even forced to use the old weight room,
12 adjacent to the gymnasium, as a classroom due to the lack of classroom space at Mount Whitney.
13 This was a geography class trying to be taught in a room filled with gym mats, not a classroom.

14 10. The school library is woefully inadequate for the amount of students at Mount
15 Whitney. The maximum capacity is 57 people. Furthermore, the area of the library which is
16 accessible to the students has been systematically reduced in size as study rooms have been
17 converted into office spaces inside the library for school counselors, the school psychologist and
18 the assessment specialist. In addition, the administration constantly schedules testing in the
19 library, be it AP testing, SAT 9 testing or other testing. At least every two weeks the library is
20 reserved for some use other than that of a library open to the students. Oftentimes, when the
21 administration is conducting meetings or has reserved the library for testing, there is absolutely no
22 student access to the library.

23 11. We do have about 10-12 computers in the library, but they do not have adequate
24 software. I personally have spent over \$120 on computer software for my students. Specifically,
25 I bought three CD ROMs of encyclopedias so that my students could access this information
26 electronically. This tends to be extremely helpful when the library is closed and we cannot access
27 the encyclopedias, but it is not adequate, as I only have one computer in my classroom.

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1 12. In Visalia we suffer from extreme temperatures. Around summertime and early
2 fall, during May, June, and September, temperatures often rise into the 90s and 100s. During the
3 wintertime, temperatures drop and having heat in the classrooms is a necessity. Unfortunately,
4 the centrally controlled system we have in place is not always reliable. I remember a few years
5 ago we went for six and one half weeks without having any heat in the classroom. In such cold
6 weather it is hard for students to concentrate on learning when they are concentrating on staying
7 warm.

8 13. The restrooms also are inadequate. There are only three restrooms for boys and
9 three for girls. There are approximately four stalls in each restroom. This is not adequate for
10 2,000 students. Oftentimes, the students complain that they have to wait in long lines in order to
11 use the bathroom.

12 14. I believe that the conditions at Mount Whitney are having ill effects on the
13 students' morale and ability to obtain an adequate education. Every student should have a current
14 textbook to use during class and to take home and study. Students should be able to study and
15 learn in a clean, safe environment where the classroom temperature is comfortable even when it is
16 scorching hot or freezing cold outside.

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

19 Executed this 17th day of July, 2000 in Visalia, California.

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Linda Cost
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