

1 **Declaration of Linda Shinn**

2 I, Linda Shinn, hereby declare:

3 1. I am a teacher at Brightwood School in the Alhambra Unified School District. If
4 called to testify I could and would do so competently as follows:

5 2. The purpose of this declaration is to explain the conditions at my school and to
6 show how those conditions severely interfere with my ability to teach and my students' ability to
7 learn.

8 3. I have been a teacher for over 40 years. I have been teaching at Brightwood for 12
9 years. I am currently teaching 6th graders.

10 4. Brightwood resembles a trailer park. There are seven portable classrooms at the
11 school. In addition, there are a number of so-called temporary buildings on the campus. These
12 buildings have been here for years and they are in terrible condition.

13 5. My classroom is one of the portables. There are a lot of problems with trying to
14 teach in this classroom. First, there is no running water in the portable, which really hampers
15 what I would like to do. For example, I find that painting and building models with clay and
16 papier-mâché is a very effective way to make history come alive for students. When I was
17 teaching ancient history, I wanted to have students do murals comparing the life of neanderthal
18 and Cro-Magnon men as well as do historical time lines. But, you can't do painting like that
19 without a easy supply of water in the classroom.

20 6. The school is built on a hill and my portable is on the upper part of the campus
21 along with three other portables. They all surround the playground. It is terribly noisy a good
22 portion of the day because students are using the playground right outside my window for recess
23 and physical education ("PE").. Grades K-4 have PE from 1:30 to 2:00 pm, and all the grades
24 take PE in groups of about 100 on Monday and Wednesday. In addition, there are recess breaks
25 from 9:30 to 10:45 am every day with 200-300 kids at a time. I have to close all the doors and
26 windows and even then its noisy and hard for the students to concentrate.

27 7. We do not have a bathroom in the portable. There is a bathroom on the upper
28 campus, but the toilets back up about 1 day a month. On those days the students have to go all

1 the way down the stairs to the lower campus to go to the bathroom

2 8. My portable is air conditioned, but the classrooms in the permanent buildings and
3 the so-called temporary buildings on the lower campus are not. I taught in one of the temporary
4 buildings from 1989 through 1997. The conditions there were horrible. I had 31-35 students in
5 my class, and the rooms were too small for that many students. There was inadequate room for
6 storage and supplies, so I kept them in my garage. (The portables are similarly lacking in basic
7 storage space).

8 9. It is very hot in Alhambra on regular basis in June, September and October, and
9 sometimes other times of the year. Without air conditioning, my classroom temperatures
10 regularly got into the 90's in those months. I brought a thermometer to class and recorded
11 temperatures above 100 degrees on occasion.

12 10. The windows in the classroom did not open. We left the doors open, but very
13 little air circulated, making it feel even hotter. The room did have a swamp cooler, but it was
14 ineffective. Worse still, when you turned it on, it would spew black filth throughout the room.
15 During the time I was teaching there, I had to have two different sinus surgeries. I have had no
16 problems with my sinuses since I moved out.

17 11. It was basically impossible to teach in those conditions. Students would sweat
18 profusely, get restless, and complain of headaches. Oftentimes, I would turn off the lights and
19 put classical music on a record player, or read to them. This was not what I wanted to be doing,
20 but trying to complete a normal lesson was fruitless.

21 12. The classrooms in the main buildings also lack air conditioning. In fact, most
22 students at Brightwood are in classes without air conditioning, despite the ferocious heat we have
23 out here.

24 13. The heat in the temporaries worked sporadically. When it was cold out, and the
25 heat was not working, the classroom temperatures ranged from the high 40's to low 60's. I would
26 regularly call the main office to ask them to fix the heat. Sometimes it would be fixed in a few
27 hours. Sometimes it would take days. On some occasions, it was so cold in the class that
28 students wore gloves.

1 14. When the heaters did work, they were noisy and distracted the students.

2 15. The temporaries were depressing places to try to teach. They were never painted
3 except for a few classrooms that parents painted. We had termites, and I regularly saw piles of
4 sawdust near the doors and windows. They smelled filthy and were not cleaned regularly.

5 16. The buildings are also unsafe. When we had the 1994 earthquake, ceiling fixtures
6 and ceiling tiles fell in. An architect came to look at the buildings, and I heard him say "these are
7 the most dangerous school rooms I have ever seen."

8 17. I am thrilled not to be teaching in the temporary buildings anymore. However, I
9 know they are in no better condition than they were when I was teaching in them, and they still
10 have no air conditioning.

11 18. Another serious problem we have with the school is the lack of accessibility for
12 disabled students and students with injuries. The only way to go from the upper to the lower
13 campus is by stairway. We have had students with leg injuries in portables in the upper campus
14 and they cannot use the lunch room or the auditorium on the lower campus.

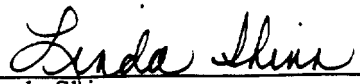
15 19. We have shortages of teaching materials or materials that are not up-to-date.
16 Most years I have anywhere from six to twenty English Language Development students (ELDs)
17 in my class of 30+ students. Last year, I had students whose primary languages were Spanish,
18 Mandarin, Cantonese, Japanese and one student who was Romanian. In order to teach these
19 students properly, I should have materials with both English and their primary language. But, I
20 usually have some texts with Spanish and no other appropriate materials for the other ELDs. I
21 spend from \$200 to \$500 a year of my own money to purchase materials for these students.

22 20. This school year, I do not have ELD students. Still, a number of the basic
23 instructional materials I needed did not arrive until 2 to 3 weeks into the semester. Others did
24 not arrive until 6 to 8 weeks into the semester.

25 21. I am currently teaching a combination class of 5th and 6th graders in one of the
26 portable classrooms. The class is made up of thirteen 6th graders and sixteen 5th graders. I am
27 teaching this class because we have about 105 sixth graders in the school. They do not have the
28 teachers or the space to teach four classes of sixth graders, so they created the combo class.

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I swear under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed by me this 3rd day of May, 2001 in El Monte California.


Linda Shinn