



SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

MATHEW & STEPHANIE MCCLEARY, on their own behalf and on behalf of KELSEY & CARTER MCCLEARY, their two children in Washington's public schools; ROBERT & PATTY VENEMA, on their own behalf and on behalf of HALIE & ROBBIE VENEMA, their two children in Washington's public schools; and NETWORK FOR EXCELLENCE IN WASHINGTON SCHOOLS ("NEWS"), a state-wide coalition of community groups, public school districts, and education organizations,

Petitioners,

v.

STATE OF WASHINGTON,

Respondent.

No. 07-2-02323-2 SEA

PETITION FOR DECLARATORY JUDGMENT ENFORCING OUR CONSTITUTION

The above petitioners allege as follows against the respondent State of Washington:

SUMMARY OF THIS SUIT

1. We applaud the Governor's budget appropriation request for the next 2 years and her committed leadership on behalf of education in that request. But such a proposal does not diminish the fact that our State government as a whole has not established the stable and dependable long term funding system that our State Constitution mandates for the education of every child in our State. We look forward to the Governor's continuing investment in and commitment to the education needs of all Washington children.

1 public school districts. The State of Washington provides such public school districts with
2 funds for education – but the State does not fully fund all of the education-related programs and
3 needs necessary to provide every child in those school districts with the basic education
4 guaranteed by our State Constitution. The following parents file this action on their own behalf
5 and on behalf of their minor children. The following petitioners have satisfied all conditions
6 precedent to bring this suit.

7 (a) Petitioners Matt, Stephanie, Carter, and Kelsey McCleary: Matt and
8 Stephanie are parents, voters, and taxpayers living in Jefferson County, Washington. They
9 bring this action on their own behalf and as legal guardians on behalf of their two children,
10 Carter and Kelsey. At the time of this suit’s filing, their son Carter is 7 years old and is second
11 grader at Chimacum Creek Primary School. At the time of this suit’s filing, their daughter
12 Kelsey is 13 years old and is seventh grader at Chimacum Middle School.

13 Stephanie McCleary was 13 years old when the Washington Supreme Court issued its
14 1978 decision requiring the State to obey its Constitutional mandate to amply fund public
15 education for all Washington’s children. Stephanie’s daughter is now 13 years old. An entire
16 generation has passed, and the State still has not complied with that ruling or its Constitutional
17 mandate.

18 (b) Petitioners Robert, Patty, Halie, and Robbie Venema: Robert and Patty are
19 parents, voters, and taxpayers living in Snohomish County, Washington. They bring this action
20 on their own behalf and as legal guardians on behalf of their two children, Halie and Robbie. At
21 the time of this suit’s filing, their son Robbie is 12 years old and is sixth grader at Cathcart
22 Elementary School. At the time of this suit’s filing, their daughter Halie is 15 years old and is
23 ninth grader at the Snohomish High School (Freshman Campus).

24 Patty Venema was in high school when the Washington Supreme Court issued its 1978
25 decision requiring the State to obey its Constitutional mandate to amply fund public education
26

1 for all Washington's children. Patty's daughter is now in high school. An entire generation has
2 passed, and the State still has not complied with that ruling or its Constitutional mandate.

3 3. Petitioner Network for Excellence in Washington Schools ("NEWS"): Petitioner
4 Network for Excellence in Washington Schools ("NEWS") is a state-wide coalition of
5 community groups, education organizations, public school districts, and others in Washington
6 who support better education in the public schools of our State. NEWS was formed to promote
7 the education of children in the public schools, and to ensure that public schools are provided
8 with the Constitutionally required State resources necessary to effectively manage and operate
9 public schools pursuant to Article IX of our State Constitution. NEWS encourages the State's
10 compliance with its paramount duty under our State Constitution to fully fund education for the
11 children of – and thus the future of – our State. NEWS is a non-profit corporation organized
12 under the laws of the State of Washington, and has satisfied all conditions precedent to bring
13 this suit. At the time of this suit's filing, NEWS includes the following member organizations
14 from all across our State:

15 (a) Washington State PTA. Washington State PTA, formally the Washington
16 Congress of Parents and Teachers, was founded in 1905. It is a state-wide, non-profit
17 membership association which brings together the home, school, and community on behalf of
18 all children and youth. It is comprised of over 150,000 members in over 900 local PTA units
19 throughout our State. It is governed by a board of directors consisting of four statewide
20 officers, 13 region directors, a leadership director, a program director, and a legislative director.
21 It is chartered by and affiliated with the National Congress of Parents and Teachers (the
22 National PTA).

23 (b) League of Women Voters of Washington. The League of Women Voters of
24 Washington is a non-partisan, non-profit organization that encourages the informed and active
25 participation of citizens in government. It was organized in 1920, and includes 23 local
26 chapters throughout our State (Bellingham-Whatcom Counties chapter, Benton-Franklin

1 Counties Chapter, Clallam County chapter, Clark County chapter, Cowlitz County chapter,
2 Grays Harbor County chapter, Jefferson County chapter, King County South chapter, Kitsap
3 County chapter, Kittitas County chapter, Mason County chapter, Methow Valley chapter,
4 Pullman chapter, San Juan County chapter, Seattle chapter, Skagit County chapter, Snohomish
5 County chapter, South Whidbey Island chapter, Spokane Area chapter, Tacoma-Pierce chapter,
6 Thurston County chapter, Whidbey Island chapter, and Yakima County chapter).

7 (c) Urban League of Metropolitan Seattle. Formerly the Seattle Urban League,
8 the Urban League of Metropolitan Seattle was first established in 1929, and is one of 115
9 affiliates of the National Urban League. The Urban League of Metropolitan Seattle strives to
10 empower, enable, and assist African Americans, other people of color, and disadvantaged
11 individuals in becoming self-sufficient through public advocacy, providing services, and
12 developing strong business and community partnerships.

13 (d) Washington State Special Education Coalition (WSSEC). The Washington
14 State Special Education Coalition is a non-profit corporation, and was formed in 1977 to bring
15 together parent and professional organizations throughout our State and to effectively advocate
16 for quality education for all children, particularly those receiving special education services in
17 our State.

18 (e) Equitable Opportunity Caucus (EOC). The Equitable Opportunity Caucus is
19 a local community organization dedicated to equitable opportunity.

20 (f) Minority Executive Directors Coalition (MEDC). Minority Executive
21 Directors Coalition is comprised of over 80 Executive Directors and Program Directors who are
22 persons of color working in private, non-profit human service, and community development
23 agencies in the King County area. It was founded in 1981 to unite the Asian Pacific American,
24 African American, Native American, and Chicano-Latino communities in advocacy for people
25 of color. It is the region's longest standing and broadest based multi-ethnic coalition of its kind.
26

1 (g) Washington Protection and Advocacy System (WPAS). The Washington
2 Protection and Advocacy System, Inc., is a non-profit corporation duly organized under the
3 laws of the State of Washington to protect and advocate for the legal and civil rights of those
4 citizens of our State who have physical, mental, and/or developmental disabilities. Over sixty
5 percent of its Board of Directors, advisory council for individuals with mental illness, advisory
6 council for individuals with developmental and/or physical disabilities, and ad hoc committee
7 for individuals with traumatic brain injuries and their family members, are themselves
8 individuals with disabilities and/or their family members.

9 (h) Arlington School District. Arlington School District No. 16 is a public
10 school district in Snohomish County, Washington with a student population of approximately
11 5,000 students.

12 (i) Bainbridge Island School District. Bainbridge Island School District No. 303
13 is a public school district in Kitsap County, Washington with a student population of
14 approximately 4,200 students.

15 (j) Bellevue School District. Bellevue School District No. 405 is a public school
16 district in King County, Washington with a student population of approximately 16,000
17 students.

18 (k) Chimacum School District. Chimacum School District No. 49 is a public
19 school district in Jefferson County, Washington with a student population of approximately
20 1,200 students.

21 (l) Edmonds School District. Edmonds School District No. 15 is a public school
22 district in Snohomish County, Washington with a student population of approximately 21,000
23 students.

24 (m) North Kitsap School District. North Kitsap School District No. 400 is a
25 public school district in Kitsap County, Washington with a student population of approximately
26 6,400 students.

1 (n) Omak School District. Omak School District No. 19 is a public school
2 district in Okanogan County, Washington with a student population of approximately 1,500
3 students.

4 (o) Pasco School District. Pasco School District No. 1 is a public school district
5 in Franklin County, Washington with a student population of approximately 12,200 students.

6 (p) Peninsula School District. Peninsula School District No. 401 is a public
7 school district in Pierce County, Washington with a student population of approximately 9,500
8 students.

9 (q) Seattle School District. Seattle School District No. 1 is a public school
10 district in King County, Washington with a student population of approximately 45,800
11 students.

12 (r) Snohomish School District. Snohomish School District No. 201 is a public
13 school district in Snohomish County, Washington with a student population of approximately
14 8,500 students.

15 (s) South Kitsap School District. South Kitsap School District No. 402 is a
16 public school district in Kitsap County, Washington with a student population of approximately
17 10,400 students.

18 (t) Washington Education Association. The Washington Education Association
19 is a state-wide organization of approximately 74,000 teachers and educators in our State. The
20 Washington Education Association's mission statement includes making public education "the
21 best it can be for students, staff, and communities." Approximately 61,000 of its members are
22 teachers and certified staff in the public school classrooms across our State (K-12), and
23 approximately 11,000 more serve our State's public schools in positions such as classroom
24 assistants and other educational support roles. The Washington Education Association is a
25 Washington non-profit corporation originally formed in 1889.

1 (u) Arlington Education Association. The Arlington Education Association is a
2 labor organization, comprised of approximately 312 education employees, that serves as the
3 bargaining representative for a bargaining unit of non-supervisory employees employed in the
4 Arlington Public Schools.

5 (v) Bainbridge Island Education Association. The Bainbridge Island Education
6 Association is a labor organization, comprised of approximately 272 education employees, that
7 serves as the bargaining representative for a bargaining unit of non-supervisory employees
8 employed in the Bainbridge Island School District.

9 (w) Bellevue Education Association. The Bellevue Education Association is a
10 labor organization, comprised of approximately 1,192 education employees, that serves as the
11 bargaining representative for a bargaining unit of non-supervisory employees employed in the
12 Bellevue School District.

13 (x) Chimacum Independent Association. The Chimacum Independent
14 Association is a labor organization, comprised of approximately 41 education employees, that
15 serves as the bargaining representative for a bargaining unit of non-supervisory employees
16 employed in the Chimacum School District.

17 (y) Chimacum Education Association. The Chimacum Education Association is
18 a labor organization, comprised of approximately 77 education employees, that serves as the
19 bargaining representative for a bargaining unit of non-supervisory employees employed in the
20 Chimacum School District.

21 (z) Edmonds Education Association. The Edmonds Education Association is a
22 labor organization, comprised of approximately 1,475 education employees, that serves as the
23 bargaining representative for a bargaining unit of non-supervisory employees employed in the
24 Edmonds School District.

25 (aa) North Kitsap Education Association. The North Kitsap Education
26 Association is a labor organization, comprised of approximately 418 education employees, that

1 serves as the bargaining representative for a bargaining unit of non-supervisory employees
2 employed in the North Kitsap School District.

3 (bb) Omak Education Association. The Omak Education Association is a
4 labor organization, comprised of approximately 95 education employees, that serves as the
5 bargaining representative for a bargaining unit of non-supervisory employees employed in the
6 Omak School District.

7 (cc) Pasco Association of Educators. The Pasco Association of Educators is a
8 labor organization, comprised of approximately 738 education employees, that serves as the
9 bargaining representative for a bargaining unit of non-supervisory employees employed in the
10 Pasco School District.

11 (dd) Peninsula Education Association. The Peninsula Education Association
12 is a labor organization, comprised of approximately 597 education employees, that serves as the
13 bargaining representative for a bargaining unit of non-supervisory employees employed in the
14 Peninsula School District.

15 (ee) Seattle Education Association The Seattle Education Association is a
16 labor organization, comprised of approximately 4,490 education employees, that serves as the
17 bargaining representative for a bargaining unit of non-supervisory employees employed in the
18 Seattle Public Schools.

19 (ff) Snohomish Education Association. The Snohomish Education Association is
20 a labor organization, comprised of approximately 557 education employees, that serves as the
21 bargaining representative for a bargaining unit of non-supervisory employees employed in the
22 Snohomish School District.

23 (gg) South Kitsap Education Association. The South Kitsap Education
24 Association is a labor organization, comprised of approximately 623 education employees, that
25 serves as the bargaining representative for a bargaining unit of non-supervisory employees
26 employed in the South Kitsap School District.

1 11. Under Article IX, the State of Washington has a Constitutional duty to provide a
2 basic education for all children at least from kindergarten through twelfth grade.

3 12. Article IX requires the State to develop and fully fund a program of basic education
4 which provides all children residing in our State with the tools that allow them to succeed both
5 in the work force and society at large.

6 13. The Washington State Supreme Court has held with respect to Article IX that:

7 [T]he State's constitutional duty goes beyond mere reading, writing and
8 arithmetic.... It must prepare our children to participate intelligently and
9 effectively in our open political system to ensure that system's survival.
10 It must prepare them to exercise their First Amendment freedoms both as
11 sources and receivers of information; and, it must prepare them to be able
12 to inquire, to study, to evaluate and to gain maturity and understanding.
13 The constitutional right to have the State "make ample provision for the
14 education of all (resident) children" would be hollow indeed if the
15 possessor of the right could not compete adequately in our open political
16 system, in the labor market, or in the market place of ideas.

17 *Seattle School District No. 1 v. State*, 90 Wn.2d 476, 517-18 (1978) (internal citations omitted).

18 14. The Washington State Supreme Court has held that Article IX requires the State to
19 fully fund the education described in paragraph 13 of this Petition with State (rather than local
20 or non-State) funds. *Seattle School District No. 1 v. State*, 90 Wn.2d 476 (1978).

21 15. Article IX requires the State to fully fund the education described in paragraph 13 of
22 this Petition with State funds, instead of with local levies or other non-State funds.

23 16. The Washington State Supreme Court has held that Article IX requires the State to
24 fund the education described in paragraph 13 of this Petition with dependable and regular
25 funding sources. *Seattle School District No. 1 v. State*, 90 Wn.2d 476 (1978).

26 17. Article IX requires the State to fund the education described in paragraph 13 of this
Petition with dependable and regular funding sources.

18. The Washington State Supreme Court has held that Article IX requires the State to
provide ample funding for the education described in paragraph 13 of this Petition as the State's
highest priority. *Seattle School District No. 1 v. State*, 90 Wn.2d 476 (1978).

1 (3) Think analytically, logically, and creatively, and to integrate
2 experience and knowledge to form reasoned judgments and solve
3 problems; and

3 (4) Understand the importance of work and how performance, effort,
4 and decisions directly affect future career and educational
5 opportunities.

5 Basic Education Act of 1993, RCW 28A.150.210.

6 31. The State legislature adopted the basic education provisions quoted in paragraph 30
7 of this Petition after years of study.

8 32. Providing the education necessary for students to learn the knowledge and skills
9 listed in paragraph 30 of this Petition is a part of the basic education that the State must provide
10 to comply with its paramount education duty under Article IX.

11 33. The State legislature has provided that the knowledge and skills listed in
12 paragraph 30 of this Petition are necessary to allow students “to become responsible citizens, to
13 contribute to their own economic well-being and to that of their families and communities, and
14 to enjoy productive and satisfying lives.” Basic Education Act of 1993, RCW 28A.150.210.

15 34. Providing the education necessary for students to become responsible citizens, to
16 contribute to their own economic well-being and to that of their families and communities, and
17 to enjoy productive and satisfying lives, is part of the basic education that the State must
18 provide to comply with its paramount education duty under Article IX.

19 35. The State has established Essential Academic Learning Requirements (“EALRs”),
20 which specify the skills and knowledge in core subjects that all students are expected to master
21 as they move through Washington’s public schools.

22 36. The core subjects for which the State has thus far established Essential Academic
23 Learning Requirements are: (1) Reading; (2) Mathematics; (3) Science; (4) Writing;
24 (5) Communication; (6) Social Studies: civics, economics, geography, & history; (7) Arts; and
25 (8) Health & Fitness.
26

1 37. Providing the education necessary for students to meet the State's Essential
2 Academic Learning Requirements is a part of the basic education that the State must provide to
3 comply with its paramount education duty under Article IX.

4 **State's Failure To Fully Fund Basic Education Under Article IX**

5 38. The respondent State has over the past several years been reducing its funding of
6 K-12 education as a percentage of the State budget.

7 39. Over the past several years, the value of each education dollar funded by the
8 respondent State has fallen due to inflation.

9 40. Adjusted for inflation, the respondent State currently spends approximately \$548 less
10 per student than it did in 1992.

11 41. The respondent State's funding for education ranks near the bottom of all 50 States
12 in the Union.

13 42. Adjusted for regional cost of living differences, the respondent State's education
14 spending per student ranks at or near 42nd in our nation.

15 43. Adjusted for regional cost of living differences, the respondent State's education
16 spending per student ranks behind Arkansas, Louisiana, South Carolina, and Texas.

17 44. The respondent State's education spending as a percentage of total taxable resources
18 ranks at or near 41st in our nation.

19 45. The respondent State's education spending as a percentage of total taxable resources
20 ranks behind Mississippi, Alabama, and West Virginia.

21 46. The respondent State's education spending per \$1,000 of personal income ranks at or
22 near 46th in our nation.

23 47. The classroom sizes in Washington's public schools rank at or near 5th largest in our
24 nation.

25 48. Washington's large classroom sizes leave our teachers struggling to provide each
26 child in their classroom with proper attention and help.

1 49. State funds do not provide enough classroom teachers for class sizes small enough to
2 provide all children the basic education guaranteed by Article IX.

3 50. Washington’s public school teacher compensation ranks last among West Coast
4 States.

5 51. State funds do not provide the professional pay and benefits needed to attract and
6 retain good teachers.

7 52. Investing in fair pay for teachers and other education professionals is needed to
8 provide all children residing in our State with the basic education guaranteed by Article IX of
9 our State Constitution.

10 53. State funds do not provide the personnel and resources needed to make the
11 interventions necessary for struggling students and struggling schools to achieve the basic
12 education guaranteed by Article IX.

13 54. State funds do not provide the personnel and resources needed to meet the academic
14 needs of groups requiring extra assistance to achieve the basic education guaranteed by
15 Article IX – groups such as low income students, communities and students of color, low
16 English proficiency students, and students with other special needs.

17 55. State funds do not provide the personnel and resources needed to ensure that every
18 public school classroom in our State has for every child an up-to-date curriculum and materials
19 consistent with the State’s Essential Academic Learning Requirements.

20 56. State funds do not provide the staff professional development needed to support
21 up-to-date curricula, innovative ideas, and “best practices” teaching methods (including
22 strategies for parent and community involvement in student learning) to provide all children
23 residing in our State the basic education guaranteed by Article IX.

24 57. State funds do not provide the up-to-date technology and infrastructure support that
25 is needed to provide all children residing in our State the basic education guaranteed by
26 Article IX.

1 58. State funds do not provide the current materials and supplies needed to provide every
2 child residing in our State the basic education guaranteed by Article IX.

3 59. State funds do not provide the resources, equipment, facilities, and training needed to
4 ensure that every public school in our State is a safe enough place to provide the learning
5 environment needed to provide each child the basic education guaranteed by Article IX.

6 60. State funds do not provide the resources, equipment, facilities, transportation, and
7 training needed to provide every child residing in our State the balanced, well rounded
8 education (including programs such as music, art, athletics, civics, and extracurricular
9 programs) needed to provide each child the basic education guaranteed by Article IX.

10 61. Many of programs needed to provide our State's children the balanced, well rounded
11 education guaranteed by Article IX (including programs such as music, art, athletics, civics, and
12 extracurricular programs) have been cut in recent years due to lack of adequate State funding.

13 62. Too many students residing in our State never obtain a high school diploma.

14 63. State funds do not amply provide for the education of our State's public high school
15 students.

16 64. State funds do not amply provide needed assistance for students struggling with the
17 WASL.

18 65. State funds do not amply provide for the education of our State's students from
19 underprivileged backgrounds – leading to higher WASL failure rates and higher drop out rates
20 for students in those groups as compared to their peers.

21 66. State funds do not amply provide for the education of our State's students from
22 minority communities and students of color – leading to higher WASL failure rates and higher
23 drop out rates for students in those groups as compared to their peers.

24 67. Right now, in Washington, only 74 percent of ninth graders graduate from high
25 school with their peers.

26

1 68. Right now, in Washington, only 60 percent of black and Hispanic students graduate
2 from high school with their peers.

3 69. Right now, in Washington, the younger working age population is less educated than
4 their older counterparts.

5 70. The State's most recent report on education in our State (the November 2006
6 Washington Learns report) concluded with respect to the statements in the above three
7 paragraphs that "These facts cannot be ignored".

8 71. The State's most recent report on education in our State (the November 2006
9 Washington Learns report) reported that "our education system is not preparing our students to
10 compete."

11 72. The State's most recent report on education in our State (the November 2006
12 Washington Learns report) reported that "our students are falling behind other states and
13 nations".

14 73. The State created the Washington Assessment of Student Learning ("WASL") to
15 measure whether students in our public school system are mastering the fundamental skills in
16 reading, writing, mathematics and science identified in the Essential Academic Learning
17 Requirements.

18 74. According to the State, the Washington Assessment of Student Learning ("WASL")
19 is one of the most reliable assessments of student achievement in the country.

20 75. In the most recent school year, only 51% of 10th graders passed the Math WASL.

21 76. In the most recent school year, only 35% of 10th graders passed the Science WASL.

22 77. The respondent State is not making ample provision for the education of all children
23 residing within the State of Washington.

24 78. Not all children residing within the State of Washington are receiving the education
25 mandated by Article IX of our State Constitution.

1 79. Although the State of Washington has admirably moved ahead in establishing
2 requirements for the basic education that must be provided under Article IX, the State has failed
3 to reform the way it funds the education it provides for that education.

4 80. The State has failed to design a funding program that determines, and then fully
5 funds, the actual cost of providing the basic education it has specified for each child residing in
6 our State.

7 81. The State does not determine the actual dollar cost of providing the basic education
8 mandated by Article IX before the State inserts dollar numbers in its budget appropriations for
9 education.

10 82. The State has not determined the actual dollar cost of providing the basic education
11 mandated by Article IX of our State Constitution.

12 83. The State does not know the actual dollar cost of providing the basic education
13 mandated by Article IX of our State Constitution.

14 84. The State has not made a reasonable estimate of the actual dollar cost of providing
15 the basic education mandated by Article IX of our State Constitution.

16 85. The State directs our public schools to provide the basic education defined by
17 statutes such as the Basic Education Act provisions quoted in paragraph 30 of this Petition.

18 86. The State does not provide the stable, dependable, and regular State funding
19 necessary to provide every child the basic education defined by statutes such as the Basic
20 Education Act provisions quoted in paragraph 30 of this Petition.

21 87. The State directs our public schools to provide the basic education necessary to meet
22 basic standards such as the Essential Academic Learning Requirements noted in paragraph 36 of
23 this Petition.

24 88. The State does not provide the stable, dependable, and regular State funding
25 necessary to provide every child the basic education necessary to meet basic standards such as
26 the Essential Academic Learning Requirements noted in paragraph 36 of this Petition.

1 **State's November 2006 Washington Learns Report**

2 89. Since our State Supreme Court's 1978 ruling in the *Seattle School District* case, the
3 State legislature has conducted numerous studies (at least 17, not including research for specific
4 projects or legislation) to address school financing concerns.

5 90. In 2005, the legislature authorized yet another study: the Washington Learns study
6 prescribed in E2SSB 5441.

7 91. The intent of the law authorizing the Washington Learns study was to provide for a
8 thoughtful and thorough evaluation of our State's education finance system to ensure that State
9 government is meeting its Constitutionally mandated requirement to make ample provision for
10 the education of the children residing within its borders.

11 92. The education costing expert hired by the respondent State for the Washington
12 Learns study (Picus & Associates) concluded that the State of Washington is significantly
13 underfunding education.

14 93. The respondent State paid approximately \$800,000 for the Picus & Associates
15 education cost study.

16 94. The main legislative charge in E2SSB 5441 was its specification in Section 3(1)(d)
17 that the Washington Learns report "shall develop recommendations about how the state can best
18 provide stable funding for student learning" (underline added).

19 95. The Washington Learns report did not develop recommendations about how the state
20 can best provide stable funding for student learning.

21 96. As the minority report to the Washington Learns report notes, "the Washington
22 Learns Steering Committee ... simply failed by choice to do what the law required."

23 97. As the minority report to the Washington Learns report concluded: "After 25 years
24 of concerns, at least 17 previous legislative studies, 18 months of additional investigation by
25 Washington Learns costing \$1.7 million, and the investment of time by hundreds of deeply
26 concerned citizens across our state, [the drafter of Washington Learns] owes the public more

