



Opportunity Through Education

Megan Degenfelder – Superintendent of Public Instruction

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May 31, 2023

Ms. Tracy Stone-Manning, Director
United States Department of Interior
1849 C Street NW, Room 5646
Washington, DC 20240

SENT BY EMAIL AND MAIL 5-31-2023
<http://www.regulations.gov> "1004-ae-92"

RE: Comments on Proposed BLM Conservation Rule

Dear Director,

These comments are directed at the proposed Conservation Rule published in the Federal Register on April 3, 2023, which regards conservation as a “use” on federal lands. As Wyoming’s elected State Superintendent of Public Instruction and member of the Wyoming Board of Land Commissioners, I oppose this rule because it will negatively impact education funding in our state.

When Wyoming became a state in 1890, the federal government granted 100% ownership in two sections, sections 16 and 36 in every surveyed township, a total of 1,280 acres, to hold in trust and support our public schools. Today, that amounts to roughly 3.5 million acres of land in Wyoming leased for multiple use such as mineral development, grazing, timber harvest, recreation and a host of other revenue generating uses. In fiscal year 2021 these state lands provided over \$100 million to support our public school students I was elected to support and educate. In addition to my role in supervision of K-12 education in the state, I am also a member of the Wyoming Board of Land Commissioners. In this role, I have a fiduciary responsibility to make sure our state lands produce as much revenue as possible for education purposes while guaranteeing they are sustainable for future generations.

Due to the nature of Wyoming’s intermixed state and federal land sections with 50% of the surface estate and 65% of the mineral estate owned by the federal government, I know from my career in the coal and oil and gas industry that any “non-use” has a direct negative impact on leasing and development of adjacent state lands which will decrease the attractiveness and associated revenue generated to fund our public schools. Additionally, Wyoming typically receives over \$500 million in federal mineral royalties which pays for education as well as state services. The proposed rule at hand directly jeopardizes education funding in our state, both from state and federal lands.

Lastly, the rule indicates that the Bureau of Land Management (BLM) will now prioritize the establishment of Areas of Critical Environmental Concern (ACEC). Doing so circumvents Congressional authority over wilderness areas, and I am strongly opposed to such overreach by the executive branch.

For the reasons stated above, I suggest you do not proceed with the proposed conservation rule. Conservation is not a “use” of federal lands, and such a designation negatively impacts education funding for Wyoming students, families, and our public educators.

Sincerely,



Megan M. Degenfelder
Superintendent of Public Instruction

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