

Dear Trustees of the Laramie County School District 1 -

We, the undersigned parents and citizens of the LCSD1, formally petition you, pursuant to W.S. 21-3-110(a)(xiii), to hold a vote of reconsideration of your October 7, 2024 decision to concur with the State of Wyoming School Facilities Division’s Most Cost Effective Remedy (MCER) study. Reconsideration by this Board would be appropriate, considering that your previous vote will not be conveyed to the Facilities Commission until its meeting in early November.

After hearing the testimony last night from both consultants and the public, we have developed a legal and legitimate way forward for this Board to pursue an alternative, lawful remedy within the existing study parameters. **Specifically, Remedy 1b, as outlined in the MCER study but discarded before refinement, is actually the most cost-effective remedy, in that it provides the greatest benefit per dollar spent.**

This logic is in accordance with W.S. 21-15-117(d) and the School Facilities Commission’s own rules, which state that the MCER shall consider the “total project cost and estimated budget for all determined remedies to address the identified need *in comparison to* the benefit expected to be derived from each remedy.” (Chapter 8, Section 5(c)(x)). We demonstrate the math behind this comparison in Table 1 of our proposed non-concurrence letter, reproduced below, using data from the study itself.

**Table 1:** Revised cost-effectiveness analysis; Remedy 1b is the most cost-effective.

Remedy	Relative Benefit <sup>1</sup>	Cost <sup>2</sup>	Cost/Benefit <sup>3</sup>
1a	210.05	\$66,000,000	\$314,210.90
<b>1b</b>	<b>345.64</b>	<b>\$88,000,000</b>	<b>\$254,600.16</b>
4a	128.25	\$106,000,000	\$826,510.72
4b	641.62	\$238,000,000	\$370,936.07
2c	502.31	\$128,000,000	\$254,822.72
4c <sup>4</sup>	787.87	\$248,000,000	\$314,772.74
LAR01	734.18	\$228,000,000	\$310,550.55

Remedy 1b, as shown in the figure on pages A01-20 of the MCER study, would allow LCSD1 to fully fund the construction of Arp Elementary, renovate Miller and Sunrise, and replace Hobbs and Jessup, all at a lower proposed cost than the current recommended MCER.

<sup>1</sup> Data from MCER study, Table 11, page A01-14

<sup>2</sup> Data from MCER study, Table 12, page A01-15

<sup>3</sup> Our calculations; cost divided by relative benefit.

<sup>4</sup> A variant of this remedy was ultimately selected in the report as MCER.

This would meet the most pressing capital construction needs of the District without destroying the neighborhood schools in the Central Triad, and at lower total cost.

In a time where an extra \$160 million may not be available from the State, Remedy 1b is a clear win-win for both parents and taxpayers.

Recognizing the short timeline, we have already drafted a letter, attached, that you can adapt and send to the State with minimal effort. The letter meets the State's requirements of non-concurrence and points towards a better, more lawful, option within the existing study.


Thank you for your time and consideration in this important matter.

  
Abigail Boudewyns



  
FRANK FUCHS

  
Dink J. Dijkstra

  
Jeremy Gross

  
Jesse Springer

  
Katie Dijkstra

  
Rebecca Lowe  
  
Ian Lowe

Murphy Booth  
Murphy G. Booth

  
Kristen Jones

In compliance with W.S. 21-3-110(a)(xiii), the aforesigned parents attest that they are citizens of LCSD1.

## Attachment A: Draft letter to be sent from LCSD1 to the State of Wyoming School Facilities Division

Laramie County School District 1 does **not** concur with the conclusions of the Most Cost Effective Remedy (MCER) study presented on October 7th, 2024. We believe the most cost-effective remedy is, in fact, Remedy 1B, which was ultimately not selected by the consultants for further refinement.

Per the requirements of Chapter 2, Section 4 of School Facilities rules, we therefore request an informal review of the MCER by the Director of the School Facilities Division, specifically as regards the selection of the most cost-effective remedy. These rules specify that any non-concurrence must include the following elements:

- (i) The decision of the Department the district would like reviewed;
- (ii) An explanation of why the decision should be reviewed;
- (iii) Any additional facts the district would like to be considered; and
- (iv) The legal authority upon which it is believed a decision was made in error.

We address each element in turn, below:

**(i) and (ii)** LCSD1 requests the Director review the MCER identified in the 2024 LCSD1 MCER study on the basis that the study did not adequately compare calculated benefits with costs as required by Chapter 8, Section 5(c)(x) of the rules and W.S. 21-15-117(d). A straightforward cost-effectiveness calculation — dividing the costs by the benefits — presented here shows that, in fact, Remedy 1b should have been pursued and refined as most cost-effective. We demonstrate this math in the table below.

**(iii)** The additional facts to be considered for the review is the ratio of costs to benefits as presented in the report and highlighted during the presentation by the consultant on October 7, 2024. **Table 1**, below, uses data from the report itself to clearly show that Remedy 1b has the lowest cost per unit of relative benefit; or, inversely, the highest benefit per unit of cost.

**Table 1:** Revised cost-effectiveness analysis.

Remedy	Relative Benefit <sup>5</sup>	Cost <sup>6</sup>	Cost/Benefit <sup>7</sup>
1a	210.05	\$66,000,000	\$314,210.90
<b>1b</b>	<b>345.64</b>	<b>\$88,000,000</b>	<b>\$254,600.16</b>
4a	128.25	\$106,000,000	\$826,510.72
4b	641.62	\$238,000,000	\$370,936.07
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4c	787.87	\$248,000,000	\$314,772.74
LAR01	734.18	\$228,000,000	\$310,550.55

<sup>5</sup> Table 11 of the MCER study, page A01-14

<sup>6</sup> Table 12 of the MCER study, page A01-15

<sup>7</sup> Cost divided by relative benefit.

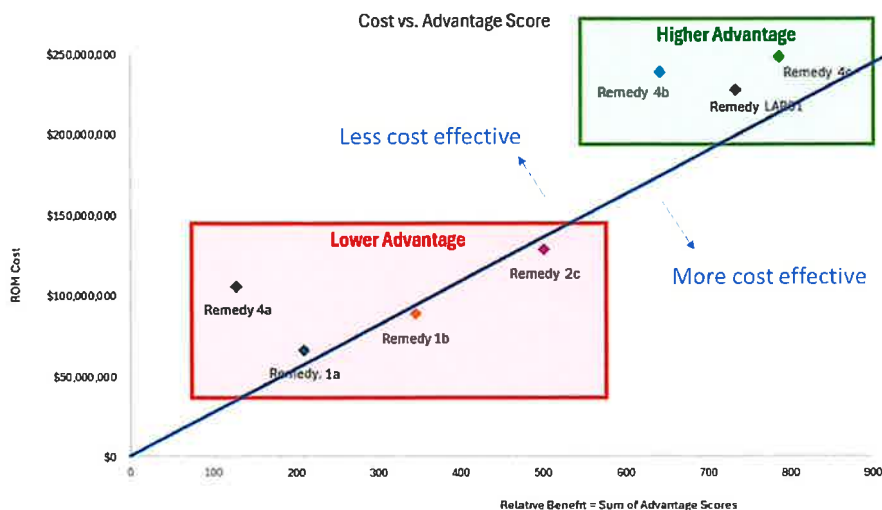
(iv) The legal authority upon which it is believed a decision was made in error lies in the definition of cost-effectiveness, and the erroneous selection of a MCER remedy in this regard.

- Ch. 8, Section 5 (c)(x) of the School Facilities Commission rules require a cost-effectiveness calculation that compares costs and benefits, not merely presents them: “The total project cost and estimated budget for all determined remedies to address the identified need **in comparison to** the benefit expected to be derived from each remedy.”
- This is further reinforced in W.S. 21-15-117(d), which requires the School Facilities Commission to “adopt the remedy that is in the best financial and educational interests of the state, taking into consideration the recommendations of the department and the **most efficient and cost effective approach** in order to deliver quality educational services and address building and facility need.”
- Finally, Ch. 8, Section 5(b)(ii) concerning MCER studies on multiple buildings requires that the remedy must be in the “best **long-term financial interests** of the State and presents the **most cost-effective means** of remedying the district's facility needs.”

It is therefore not enough in the current study to plot the costs and benefits on a chart and pick the remedy with the highest benefit as a “comparison,” especially when they come at highest cost. Instead, cost-effectiveness should be measured directly as the ratio of costs to benefits; i.e., how much each unit of benefit costs.

**Figure 1**, below, shows our annotations on Figure 4 from page A01-16 of the MCER study as a companion to Table 1. Instead of merely selecting the “higher advantage” remedies for development, cost-effectiveness -- here, illustrated graphically using a line linking costs and benefits -- should have been the criteria used to select the Remedy with the lowest cost per unit of benefit obtained.

**Figure 1:** Annotated conclusion from the MCER study. District’s annotations in blue.



Finally, we note that, given the absence of public feedback thus far in the MCER process, being responsive to public comment at this stage would help the Commission solidify its own statutory compliance with Wyoming Statute 21-15-117(d), which requires the Commission to take into consideration the effects of the proposed activity on the local community when conducting MCER studies.

Thank you for your consideration of this request.