



W.J. McCABE (DULUTH) CHAPTER IZAAK WALTON LEAGUE OF AMERICA

P. O. Box 3063 • DULUTH, MN 55803

September 12, 2024

Trevor Peck
Special Projects Manager
Superior National Forest
8901 Grand Ave Place
Duluth, MN 55808

RE: U.S. Forest Service Proposed Acquisition of approximately 80,000 acres of School Trust lands and 3,200 acres of St. Louis County lands within the BWCAW and approximately 17,000 acres of TCF lands outside of the BWCAW but within the Superior National Forest boundary

These comments are provided to the Superior National Forest on behalf of the W. J. McCabe Chapter of the Izaak Walton League of America. Our chapter of about 130 members has long been an advocate for the protection and sustainability of water quality, fish and wildlife habitat, public lands, and outdoor recreation values of northeastern Minnesota. The McCabe Chapter supports the proposed land purchases between the U. S. Department of Agriculture, Forest Service and the Minnesota Department of Natural Resources acting on behalf of the State of Minnesota and as trustee of Permanent School lands, St. Louis County, and The Conservation Fund (TCF).

The Boundary Waters Canoe Area Wilderness (BWCAW), Superior National Forest and Voyageurs National Park are critical components of the northern forest ecosystem that our members and so very many of the public use and value. There is strong public support for protection and enhancement of the wilderness quality and unique status of the BWCAW. This forested wilderness landscape is a national treasure that provides outstanding recreation value to many thousands of people from all over the nation each year.

The BWCAW boundaries encompass a patchwork of units of School Trust lands that have been a challenge for management by both the Forest Service and State for years. These small holdings within the federal wilderness area are not economically viable for the State, and present a contradiction between the purpose for economic return, and the wilderness laws and regulations implemented by the U. S. Forest Service. Approaches to solving this management problem have stymied all parties until recently.

We are pleased that the Forest Service, the State of Minnesota, TCF, and St Louis County have all expressed agreement in direct purchases by the Forest Service for 80,000 acres of School Trust Lands, for 17,000 acres of TCF holdings, and for 3,200 acres of tax-forfeit lands now held by the County. We understand that funds for this purchase are available once the Categorical Exclusion Decision Memo has been fully vetted and the Decision Memo has been approved. The Minnesota School Trust program will finally receive financial benefit from the sale of its BWCAW inholdings. Likewise, St Louis County programs and taxpayers will benefit from the sale.

The future use of these purchased lands will be managed to perpetuate and protect the natural

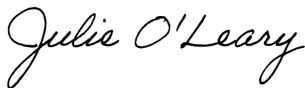
ecosystems, preserve their wilderness character, and provide an enduring wilderness resource for future generations, as well as provide continuing opportunities for a primitive and unconfined recreation experience.

The TCF lands acquired inside the Superior National Forest boundary will increase public and tribal access for multi-use purposes under three Forest Plan themes: General Forest, Forest Longer Rotation, and Recreation Use in a Scenic Landscape. This acquisition within the Superior National Forest will provide additional economic opportunity for forest management and the timber industry that would not otherwise be available. Thus, the overall land purchase is consistent with and fulfills the multiple public benefits provided by the National Forest.

The School Trust, St Louis County and TCF Land Purchase appears to be a win-win-win prospect for all parties and supports the public interests in the Superior National Forest, and especially in the Boundary Waters Canoe Area Wilderness. The W. J. McCabe Chapter of the Izaak Walton League fully supports and encourages this land purchase in its entirety and looks forward to the next steps in its implementation.

Thank you very much for this opportunity to comment on this issue at this time.

Sincerely,

A handwritten signature in cursive script that reads "Julie O'Leary".

Julie O'Leary
President, W.J. McCabe Chapter
Izaak Walton League of America