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Superior National Forest
ATTN School Trust, St. Louis County, and TCF
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These comments are submitted in support of proposed land purchases with the Minnesota Department of Natural Resources, St. Louis County, and The Conservation Fund (TCF). Specifically, I write in support of the purchase by the federal government of approximately 80,000 acres of School Trust lands and approximately 3,200 acres of tax-forfeit St. Louis County lands within the Boundary Waters Canoe Area Wilderness (Boundary Waters) and approximately 17,000 acres of TCF land located outside the Boundary Waters and within the proclamation boundary of the Superior National Forest. Finally, I write in support of decision-making in this unique instance using a categorical exclusion under the National Environmental Policy Act (NEPA).

A purchase of the School Trust lands would be in the best financial interest of Minnesota's school children.

School Trust lands were granted to the State of Minnesota upon statehood for the purpose of funding education. Over time most of Minnesota's School Trust lands were sold. Sale proceeds, in addition to income from retained lands, were deposited in a Permanent School Fund. The Permanent School Fund is managed by the State Board of Investment to provide public education funding in perpetuity. \$51 million for public education was distributed from the Permanent School Fund for the 2023-2024 school year.

Financial analyses time and again have shown that Minnesota's students would be better off if the School Trust lands within the Boundary Waters were purchased by the federal government and the proceeds deposited into the Permanent School Fund. Likewise, analysis by the Minnesota School Trust lands administrator supports this conclusion.

More than 30 years ago, a sale of School Trust lands within the Boundary Waters was proposed. Unfortunately, this federal purchase option has been delayed by some who claim that a land exchange (School Trust lands within the Boundary Waters exchanged for Superior National Forest lands outside the Boundary Waters) and development of exchanged lands for logging would result in higher economic return. In fact, such a land exchange would return less financial reward to the Permanent School Fund and Minnesota's public school children.

The enclosed article (Sale of trust lands would yield far more than an exchange) in the August 16, 2024 issue of the Timberjay newspaper documents the greater benefit of a purchase. A purchase price of the School Trust lands inside the Boundary Waters (subject to federal appraisal) is assumed to be \$32-\$34 million. Taking the average, \$33 million, as the purchase price, invested by the State Board of Investment and left untouched, and assuming the historic rate of return for the past 10 years, would yield \$528 million in forty years. In contrast, net revenue from logging on exchanged acreage, based on current net revenue received by the Minnesota Department of Natural Resources for the past 10 years for logging state lands, with proceeds deposited into the Permanent School Fund and left untouched, would yield \$33 million in forty years. Needless to say, \$528 million is of materially better benefit to Minnesota's children than \$33 million.

I request that you consider the significantly greater financial benefit to Minnesota's school children and the Permanent School Fund in your review.

A purchase of School Trust lands within the Boundary Waters is authorized by federal law.

Some have challenged the authority of the federal government to purchase School Trust fund lands located within the Boundary Waters, a national wilderness area. Express Congressional authority for the federal government to purchase School Trust lands within the Boundary Waters is contained in the Weeks Act of 1911, as amended and expanded by the 1924 Clarke-McNary Act, by the Organic Act, and by the Land & Water Conservation Act of 1965, as further expanded and permanently authorized by the Great American Outdoors Act of 2020. Fifty million dollars was appropriated for purchase of School Trust lands within the Boundary Waters and other lands in March 2020.

I request that you explain the Congressional authorization for a purchase of School Trust lands located within the Boundary Waters.

A purchase of School Trust lands and St. Louis County lands would consolidate federal ownership of lands within the Boundary Waters and support management as an intact wilderness canoe country, with no competing distractions. Acquisition would eliminate a risk of incompatible development or uses.

The Boundary Waters is a world-class wilderness area and unique as America's only significant wilderness canoe country. It is the most visited National Wilderness Area in the United States, a remarkable feat achieved every year since designation as a National Wilderness Area in 1964.

I request that you address the beneficial unified management of the Boundary Waters by the purchase of School Trust lands and St. Louis County lands.

A purchase of 17,000 acres of TCA lands outside the Boundary Waters and within the Superior National Forest proclamation boundaries will provide unified public ownership of forested lands.

The TCF lands are currently being managed for timber production and sales. Acquisition by the federal government for multiple use would unify ownership and provide opportunities for public recreation and tribal access; these opportunities for public recreation and public/tribal access do not exist under TCF ownership. Acquisition would also support protection of unique wetlands habitat and endangered species habitat (lynx) as well as preserving areas of biodiversity significance. Acquisition would facilitate the preservation of wild rice habitat. Finally, TCF lands contain timber resources that could be developed pursuant to the Superior National Forest management plan.

I request that you consider the benefit of unified public ownership of critical parcels owned by TCF and the new opportunities for recreation, tribal access, wetland preservation, lynx habitat preservation, and timber management.

An exchange of Superior National Forest lands outside the Boundary Waters for the School Trust lands within the Boundary Waters would deprive three Ojibwe bands that signed the Treaty of 1854 of their rights to hunt, fish, and gather on the Superior National Forest lands that the State would receive in an exchange because these rights do not exist on state-owned land.

The three Ojibwe bands oppose an exchange and support a purchase of the School Trust lands by the federal government.

I request that you consider the 1854 Treaty rights of three Ojibwe bands which would be retained if the School Trust lands were purchased by the federal government and the lost in an exchange.

Thank you for consideration of my comments.