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Comments: 9/17/24

Thomas Hall, Forest Supervisor

Forest Headquarters

8901 Grand Avenue Place

Duluth, MN 55808

RE: School Trust, St. Louis County, and TCF Land Purchase #66600

Dear Forest Supervisor Hall,

The Range Association of Municipalities and Schools, wishes to share the following comments on the comment period for: The Superior NF Initiates Scoping Period with Public Comment for the purchase of 80,000 acres of Minnesota School Trust Land, 3,200 acres of St. Louis County Land, and 17,000 acres of The Conservation Fund land.

#### Process Concern

We are concerned that the Minnesota DNR withdrew its participation in the EIS for the land exchange and feel that it was not in the best economic development interest of northern Minnesota, where a large portion of land is held in public hands. We would have liked to see a transaction that includes a land exchange as part of the package. Doing so would have honored the historical efforts by members of various state and federal administrations, as well as decades of work by Iron Range lawmakers.

If that is not the case, as posted, please consider our feedback and recommendations below regarding the 80,000 acres of School Trust land, 17,000 acres of The Conservation Fund (TCF) land, and 3200 acres of St. Louis County land in the package.

#### A Distinction

RAMS wishes to draw a distinction between the interests and obligations of the partners involved. The Office of School Trust Lands (OSTL) has a mandate to realize the greatest return for the benefit of the Trust. RAMS simultaneously acknowledges this yet has an obligation to communicate the needs of its member communities, which may differ from the mandate of the Trust. RAMS members have indicated both that realizing a sale when it may be the "best deal" on the table is valid - while at the same time acknowledging that we have a mandate to advocate for the economic development of our region, most ably facilitated in our view by a land swap and sale combination. Locking additional lands in permanent public ownership and keeping it out of the possibility of private development when a large portion of our northern MN area is already publicly owned and managed, is a concern. Our communities already run into problems having to work around public land for business and regional economic development, housing and responsible industrial development in particular. A swap would have opened up the possibility of responsible land use for economic development. Sadly, this appears off the table.

## RECOMMENDATIONS

### Valuation and Compensation

If the sale-only does proceed as posted, RAMS would advise the Forest Service and State of MN to take the following under consideration: get the highest value possible for the OSTL, TCF, and St. Louis County land, and consider their distinctions within the same package when determining the best path forward.

### TCF Lands

The TCF lands lie outside the wilderness area, yet still within the SNF. Because of this, we encourage them to be handled differently. We are supportive of consolidating the federal footprint within the boundaries of the Wilderness area (School trust lands). However, the targeted TCF lands that lie outside the Wilderness area, but still within the Superior National Forest should not become federally owned.

Provide the funds to another public entity so they may acquire the TCF lands. This distinction is important because: firstly, the TCF lands pay taxes. Secondly, they are currently in private hands. The Forest Service will grow the federal footprint, which we oppose. Rather, we would like the Forest Service to consider using another public entity, such as the counties - or OSTL- as fiscal agent to facilitate the sale of the TCF lands and be their holder to beneficiate those lands.

We encourage the Forest Service to find the best fiscal agent and owner and provide the funds for the TCF purchase to that entity who may best be able to execute the goals of the forest plan. To otherwise put those now tax-paying lands in permanent, federal easement, would be not allow the lands to be used for their highest and best use within the forest plan.

### School Trust Lands

If the 80,000 acres of School Trust land are not exchanged, and in fact purchased for the benefit of the Trust, take every step to ensure that you get the highest value possible. Even if this takes extra time and requires more extensive valuation process, we have one shot at this to get the highest value for the Trust.

Special consideration should also be made for considering back-payment of the lands in the Wilderness (OST Lands in particular) since they have been unable to be used to the benefit of the school trust since its inception. Again, while RAMS does not disagree that lands in the Wilderness area are not to be beneficiated, we do acknowledge that this is a moment for any one-time payment that is made reflect this reality. We encourage the one-time payment transaction be of sufficient value to reflect both the unrealized historical income for the school trust and its current value.

### St. Louis County Lands

We support the sale and purchase of St. Louis County Lands as part of the managed forest plan.

### Tygh-Blatnik

If and when lands become owned by the federal government, they must immediately be made eligible for Tygh-Blatnik PILT payments at the highest historical valuation possible.

Thank you for your consideration of these items.

Sincerely,

Paul Peltier  
Executive Director  
Range Association of  
Municipalities and Schools

Range Association of Municipalities and Schools (RAMS) The organization represents more than 155,000 residents and 69 public sector units of government, including 27 cities, 15 public school districts, and 27 townships in the 13,000 square mile Taconite Assistance Area (TAA) of northeast Minnesota. As an organization, RAMS has represented the interests of the Iron Range region for 85 years.