



Payette Endowment Lands Alliance, Inc.

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Honorable Commissioners:

This letter provides our comments on agenda items #7 and #8 for the Land Board meeting scheduled for November 17, 2020.

The Payette Endowment Lands Alliance, PELA is a grassroots organization working to conserve and protect the State of Idaho endowment lands located in the McCall area and the North Fork Payette watershed for current and future generations, while acknowledging a fiduciary responsibility to preserve the Idaho Endowment Trust.

We have reviewed Trident's latest proposal and remain firmly opposed to it and to the concept of a large-scale privatization of the McCall area endowment lands. We plan to provide more specific written critiques of this proposal, and for now here are several major issues:

1. It represents a drastic break from how these lands have been managed since statehood;
2. The proposed swap would dispose of these precious lands for far less than what their values at auction would be, thus depriving the endowment trust beneficiaries of immediate values and extinguishing any possibility for long-term returns to accrue to the trust.
3. It would not be reasonable or economically prudent to put control of such a large portion of the McCall area in the hands of one private, profit-seeking entity.
4. It ignores the substantial planning and work done by the McCall City Council, the Valley County Commissioners, and the public that resulted in the 2018 McCall Area Comprehensive Plan. Many voices are better than one, and this McCall Plan should serve as a primary source for development and preservation in the region.

PELA advocates that ecological considerations must be paramount to planning in this region. PELA strongly supports IDL's value of stewardship, which IDL describes on its website as "making decisions and taking actions that positively affect long-term financial returns for the trust beneficiaries and enhance the health and resilience of Idaho's natural resources".

In a letter to the public a few months ago, Dustin Miller recognized that caring for the ecology accrues to the endowment beneficiaries when he stated: "Given our long term management mission, we understand that improving the ecological conditions of the lands we manage improves the bottom line for our beneficiaries."

In addition to the importance of the endowment lands, Payette Lake is central to the ecology of this region. IDL and the Land Board not only have a public trust obligation for the endowment lands, but the State also holds all waters in trust for the benefit of the public. These dual responsibilities need to be managed consistently, and PELA advocates that the undeveloped lands around Payette Lake should be held in perpetuity as a living buffer for the lake.

Keeping in mind these overarching values of ecological health, stewardship, and the trust beneficiaries, PELA has undertaken an initial review of the IDL draft plan and finds as follows:

We agree with IDL's proposal with regard to:

- Taking a disciplined, multi-phased approach
- Finding that transition lands in a community context require long-range evaluation
- Its "[w]illingness to work with stakeholders to identify opportunities that will close financial gaps and allow IDL to hold lands in current management"
- Its desire to "[e]xamine other opportunities that will increase revenue"
- Providing a public comment period in December through January.

We have some serious concerns about:

- Development on certain of these lands, such as Parcel G, due to the immediate and long-term damage it would cause to the Lake
- Accounting for sales in the area, where the proceeds of sales go into the Land Bank and are not included in the revenues from the area
- We advocate that IDL should discard the possible strategies of a land exchange or disposition of any significant amount of land, while recognizing that certain parcels, such as the Deinhard 80, could make sense to sell or lease

In closing, we advocate for the State to reject the false allure of any proposals that purport to offer a quick fix here. Fortunately, however, it is becoming increasingly clear that the City of McCall, Valley County, the residents of the region, and stakeholder groups are determined and willing to collaborate and support the Land Board and IDL in identifying and developing solutions to protect the McCall area endowment lands.

Finally, we applaud the Land Board for declaring the current moratorium, and we respectfully request an extension of this moratorium for an additional 12 months to give IDL, local officials, and stakeholders sufficient time to work together to develop an excellent management plan.

Sincerely,
PAYETTE ENDOWMENT LANDS ALLIANCE