
From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:53 AM
To: Comments
Subject: Comment Submitted

From: Terry Hoffpauir at kuppakoffee@gmail.com
Phone: 2083153099
Address: 13948 Country way
City: Mccall
State: Idaho
Zip Code: 83638

Comment:
Endowment Land Managers
Hello

I am writing to state my opposition to the sell of state properties around Payette Lake in Valley County, Idaho other than those areas that were state rental lands with residential homes on them! The selling of the public properties surrounding the lake to the elitist, to increase their vast wealth and profits and to destroy the beauty and heritage of native Mccall, Idahoans is absurd! My wife is a Mccall native and her extended family lived here previously for numerous years prior to her arrival some 64 years ago. Personally, after meeting her, I have lived here for more than 46 years. The thoughts of condos and exclusive, locked up, gated communities of 10 million dollar homes all around the north end of the lake would destroy the awesome beauty and splendor of Mccall! Please do your part to protect these lands so that the Upper Payette drainages and Payette Lake shores are preserved for the generations of visitors to come! The monies received from the sale will be short lived in the government bureaucracies waste machine, but the consequences of your supposed responsible duty will wreck the Payette Lakes steep surroundings forever! Anyone who has lived here loves it the way it is! Leave it alone. No one on the payroll of the state has a right to sell it to someone whose goal is profit. Do the RIGHT thing!

Sincerely
Terry Hoffpauir
Mccall Id

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 6:12 AM
To: Comments
Subject: Comment Submitted

From: Misty Hill at notreallyblondeone@yahoo.com
Phone: 2085738163
Address: PO box 78, 316 N. Heigho
City: New Meadows
State: Idaho
Zip Code: 83654

Comment:

Don't sell the beautiful land in McCall Idaho to private investors. It's such a great place to eat lunch. Why let a few people own and enjoy it, instead of a whole community and visitors. Keep Idaho beautiful and safe from the growth that gets out of hand. I love taking my visiting family to the public access areas.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 6:43 AM
To: Comments
Subject: Comment Submitted

From: Kathryn Wheeler at
City: McCall
State: Idaho

Comment:

I am sending this comment to vehemently oppose the selling of endowment land along Payette Lakes. This land should be managed in a way that revenues are not an issue but that the community can still access and utilize it. You are looking at selling something that makes McCall what it is and why people want to enjoy this community. No one should be allowed to privatize these areas in particular. This is land that is used by so many and it should stay as such.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:04 AM
To: Comments
Subject: Comment Submitted

From: Irene Shaver at shaverirene@gmail.com
Phone: 2083150880
Address: 13775 nisula rd
City: McCall
State: Idaho
Zip Code: 83638

Comment:

McCall is my home and these lands represent some of the most precious lakefront property the public has access to. Other lake towns that I've had the foresight to not make all Lakeshore privately owned have benefited immensely both ecologically and in terms of equity of access. Private, wealthy ownership does not necessarily generate income for our town. It creates extractive economies that are low wage for workers in McCall and very rarely translates to building our community in the sense that these families integrate, work, and share resources within the community. We already have a majority of second home ownership and it drains city tax dollars and creates a feast or famine economy. Meanwhile the families that live and work in McCall year-round have access to these beautiful cliffs and islands and get to enjoy their public lake especially on the off-season when all the tourists are gone. That has been one of the most valuable experiences of living in McCall is the richness of her natural resources and that they're still remains public access. As people who hold it in trust for the public it is your responsibility to understand equity and to have a vision that is comprehensive and long-term has to include the ecological reality of how necessary it is to protect these conservation lands and maintain public access indefinitely. We have taken care of these lands because we love them. They are our inheritance. Anyone that is handled estates knows It is tempting to make the quick sale but it almost never generates the long-term wealth that the resource has if you consider wealth more holistically than just plain cash in pocket today and consider legacy and many future generations, relationship, ecology, family, equity, peace, and trust not to mention economic growth and long term investment. It is your responsibility to not pander to the highest bidder and make the quick sale. That is why you hold it in trust. On our behalf. And we say no. I implore you to consider your integrity and your duty in this matter. Currently you have a limitless resource of growing value. If you cash out now you will have a limited resource of diminishing value. There's no question here what benefits the most people over the longest time. This is not your land, this is our land. Find your humility and integrity in that great honor to care for such a valuable resource on behalf of the public.

From: Tammy Armstrong
Sent: Monday, March 1, 2021 7:12 AM
To: Dave Bingaman
Cc: Renee Jacobsen; Kellie LaBonte
Subject: FW: Valley County Comments
Attachments: Letter to Idaho Department of Lands 2-22-21 (2).pdf

Good morning Mr. Bingaman:

Thank you for submitting your comments. I am forwarding your attachment to Renee Jacobsen and Kelli LaBonte as they are the individuals that are overseeing the comments through our on-line process.

Regards,

Tammy Armstrong

Tamara L. Armstrong
Real Estate Program Specialist

Idaho Department of Lands
300 N 6th Street, Suite 103
Boise, ID 83702
208-334-0215

From: Dave Bingaman <dbingaman@co.valley.id.us>
Sent: Monday, March 1, 2021 7:09 AM
To: Tammy Armstrong <tarmstrong@idl.idaho.gov>
Subject: Valley County Comments

Good morning Tammy,

We mailed our comments last week, but I just wanted to make sure you all had the electronic version as well.

Thank you for your help in facilitating the Focus Group meetings.

Best,

Dave Bingaman
Valley County Commissioner
219 N. Main St.
Cascade, ID 83611
208-315-5079

Valley County Board of County Commissioners

PO Box 1350 • 219 N Main Street
Cascade, Idaho 83611-1350



Phone (208) 382-7100
Fax (208) 382-7107

ELTING G. HASBROUCK
Chairman of the Board
ehasbrouck@co.valley.id.us

DAVID H. BINGAMAN
Commissioner
dbingaman@co.valley.id.us

SHERRY MAUPIN
Commissioner
smaupin@co.valley.id.us

DOUGLAS A. MILLER
Clerk
dmiller@co.valley.id.us

February 21, 2021

Idaho Department of Lands
300 N. 6th Street, Suite 103
Boise, ID 83702

Re: Payette Endowment Lands Strategy

IDL staff and Land Board Members,

Regarding the draft Payette Endowment Lands Strategy (PELS), Valley County would like to commend IDL for the creation of the Focus Group to engage local stakeholders in crafting a final draft of the PELS. We ask for further consideration on the following points that have been raised during the Focus Group meetings and have been echoed by many of the residents of Idaho in the form of public comment.

- 1-Please consider allowing the Focus Group to continue to function beyond the mid-March timeline as an Advisory Group and slow down the current timeline on adopting the draft PELS.
- 2-During this time investigate how local groups or jurisdictions could utilize long term Conservation Easements, recreational and traditional leases to augment income on Endowment lands.
- 3- Explore ways for IDL to evolve as local economies statewide shift from resource dependent to recreation dependent.
- 4-Include access easements on properties that do end up in disposition.

We request that the process started by the Focus Group be allowed to continue in the form of an Advisory Board to help IDL make comprehensive decisions on these unique lands in and around Valley County, especially those in the McCall Impact Area, McCall City Limits, around the shoreline of Payette Lake and the surrounding watershed of the North Fork Payette River. Since the strategy outlined in the PELS has the likelihood of becoming a template for many of IDL's lands, give it more time to ensure that the final product is a success and a win/win solution for the Endowment, local communities and the citizens of Idaho. A more comprehensive strategy that looks at the application of the creative solutions proposed during the Focus Group meetings as well as the full range of benefits and impacts to local economies such as recreation should be included in the plan. By slowing down the process, it will give local stakeholders and IDL the time to more fully examine all options and create a valuable tool for analyzing other IDL lands around the state.

We urge IDL to investigate the viability and legality of utilizing permanent Conservation Easements on the most sensitive parcels around Payette Lake prior to making any final decision. Access to the lake should be retained for

future generations and not traded for short term gain. Protection of the watershed is essential not only for the municipal water supply in McCall but also for irrigators, homeowners and recreators on Payette Lake and far downstream. Connectivity of these lands to the National Forest and to other IDL lands is essential to achieve these goals.

We encourage a combination of long-term recreational and traditional leases in addition to selective use of Conservation Easements to offset income gaps identified on Tier 2 and 3 lands described in the PELS as an alternative to disposition. Outdoor Recreation is the main driver for the Valley County economy and contributes over \$7 billion each year to the Idaho state economy. Outdoor Recreation relies on open spaces and access to the lakes, forests, streams and mountains on IDL land and beyond. We see a need to supply more recreational infrastructure and manage it to meet the growing recreational demand throughout this area as more people move to Valley County and come here to visit each year. Including Outdoor Recreation as an IDL asset class and adding it in IDL's directives will allow it to become a valuable financial contributor to the Endowment while helping to support local economies. From the standpoint of the County and considering the constraints of our funding cycle, we would like more time to explore our financial options for pursuing both C.E.s and recreational leases before a final decision is made.

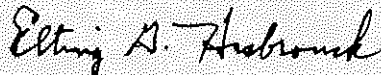
As parcels in this area come up for disposition, please consider mandating access easements where appropriate. In addition to maintaining access through IDL lands adjacent to National Forest lands on the perimeter of Valley County, please consider access corridors for greenbelts and trails on the Tier 1 properties within the McCall City Limits, specifically a corridor from Lick Creek Road to Ponderosa Park on Parcels C and D.

We believe that by allowing ample time for these items to be included in the PELS and by working together with Valley County, the City of McCall and other key stakeholders in the area that IDL can utilize these innovative approaches to land management to help preserve the character of the area and our ability to access the open spaces within it while maintaining its financial duties to the Endowment. The Valley County Comprehensive Plan accurately captures this sentiment and clearly states the need for open spaces within our County in its opening pages:

"The purpose of the Comprehensive Plan is not to control land, but to prevent uses of land harmful to the community in general. The natural beauty and open characteristics of the county can, without reservation, be described as a major reason why land development is rapidly increasing in the county. The purpose of this plan and analysis is to guide development so as not to harm the characteristics which attracted it here in the beginning."

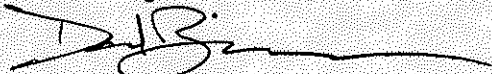
Thank you for your consideration,

Valley County Board of County Commissioners:

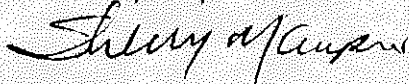


Elt Hasbrouck

Dave Bingaman



Sherry Maupin



From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:12 AM
To: Comments
Subject: Comment Submitted

From: Charity Andersen at charity@cfandersen.com
Phone: 714-625-6659
Address: 411 Deinhard Lane F161
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I cannot imagine losing thousands acres of public/endowment land where we mountain bike, take family walks, enjoy nature, bird watch, kayak, swim, ski, snow shoe, pick huckleberries, hunt for morels and do all the outdoor things residents of McCall do.

Currently our town struggles with the overload of visitors, I could not imagine having more bodies here limiting access to this beautiful land and lake, causing destruction, lack of water, sewage issues, traffic, crime, lack of wildlife, etc etc.

The main reason I moved to McCall was for its small town feel, the tight knit community, the one lane highways and roads with speeds below 25 mph where my family can walk and ride safely. The water I can drink from the tap. The beautiful trees that provide an enormous amount of clean air that help eliminate allergies and other environmental illnesses, they provide peacefulness, homes for wildlife, serenity.

Please, I am begging you. If it's money the city and state desire, let's think of other options to make improvements without taking away our lake access, our trails, our family time and our mental health.

As a full time resident of McCall, I am willing to help the community to avoid future developments that will reek havoc on our lake, land, safety, mental health and more.

I am here for life and willing to do what it takes to keep our precious little village just that, little.

Suggestions:

1. Charge tolls for anyone traveling Highway 55. Reduced rates for Valley County residents.
2. Offer a % of land to buy for every full time McCall resident that is being considered to sell and/or develop to keep it clear of destruction.

Again, money can come in other ways and I want to help figure that out.

Please reach out to me at 714-626-6659 or charity@cfandersen.com.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:16 AM
To: Comments
Subject: Comment Submitted

From: Sheree Sonfield at sonfield@telus.net
Phone: 2087206889
Address: PO Box 295
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Thank you for the opportunity to comment on the PELS and for your work to engage the Focus Group members in meaningful and important discussion.

I strongly urge you to consider the following, in addition to the Focus Group comments:

1. Go slowly, slowly and more slowly in creating this plan. These lands have been here since Statehood and we need to get this process right and not lose an opportunity for the beneficiaries that could come from some unique proposals which may take more than a couple of weeks to put together. There are critical access points, trails, and existing uses to be prioritized (by potential applicants) and there are tools that can be utilized (eg Conservation Easements) that have not yet been used by IDL. Time is of the essence, but more time is essential to producing a result that is a model potentially for all of Idaho.
2. A more comprehensive plan than this is needed that would encompass more than just the approx. 5,000 acre City of McCall Impact Area. A more comprehensive plan for the approx. 20,000- 30,000 acres surrounding McCall and critical to our community's watershed is more relevant to us in McCall today. The larger area around McCall and what activities are on it impacts our community drinking water, our recreation, our access to Forest Service lands beyond Endowment land. Therefore, this larger area is what impacts us here in McCall and is what we should be working on with you.
3. Big Payette Lake is the sole source of drinking water for our community and is a critical natural resource for our community that must be protected. Financial analysis of the value of endowment lands within the watershed that feeds the Lake should include an evaluation and cost of mitigation measures to protect our source of drinking water: protect erosion of the shoreline and its impacts; protect riparian areas; prevent untreated and contaminated run-off impacts; and retain the maximum amount of undisturbed drainage areas with natural vegetation for lower cost treatment of run-off. This and subsequent plans should honor the decades of effort and all the rules and regulations by Idaho DEQ and our local community to protect the water quality of the Lake.
4. Prioritize the use of Conservation Easements which are a way to generate revenue for the Endowment, as they are purchased at fair market value. This will allow for traditional uses (eg timber, grazing) and allow for continued revenue. This will also protect the most sensitive parcels adjacent to the Lake and allow access to other areas. Please allow time for local conservation groups and other stakeholders to create these easements which do provide fair market value compensation to the endowment fund and will also meet the public's goals for access, recreation, and conservation. Access to forest service lands, Payette Lake and existing trails is critical.
5. Continue to provide for stakeholder engagement throughout your processes, as this too can avoid losing an opportunity for the beneficiaries. Problem-solving and innovation come from utilizing the talents of the community. It builds goodwill and understanding for your efforts.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:20 AM
To: Comments
Subject: Comment Submitted

From: Thomas Manning at TMANNING@IDNEURO.COM
Phone: 208 514-5265
Address: 2000 N 21st St
City: Boise
State: Idaho
Zip Code: 83702-0737

Comment:

Dear Land Board Members and IDL Officials,

The current draft of the Payette Endowment Lands Strategy (PELS) is a beginning point. The draft document requires significant further work and revision. The future of Idaho Public Endowment Lands is at stake. Idaho needs for its Department of Lands to get the PELS right. A lot depends on it. The future of wild places in Idaho depends on it. Our watersheds depend on it.

It is time for our elected officials and our IDL staff employees to acquire and demonstrate moral courage. For too long, we have been listening to certain elected officials who sit on the Land Board speak down to Idahoans. These officials invoke the lofty concept of their “constitutional mandate” as an excuse to abuse the land, trash our watersheds, and sell off the public land birthright of future generations of Idahoans. They imply that this constitutional mandate has inextricably tied their hands and prevented them from exercising proper judgment, sound leadership and viewing problems with a moral compass. It’s a rubbish argument. It’s simply a gross violation of Public Trust. It needs to stop.

The private equity land developers who are trying to turn a quick profit and their slick lobbyists need to be sent packing back to New York, Boston and other big cities of the east. These developers are threatening lawsuits if prime real estate is not handed over to them for cents on the dollar. One recent analysis had Trident proposing to swap 50 million dollars worth of Northern Idaho timberland for land around Payette Lake valued at over a billion dollars! This is how the east coast private equity firms work. The effort is only justified if the profits are astronomical. Groups like Trident Holdings and the inexperienced, young, brash Alec Williams need to be told that the Public Land of Idaho is simply not for sale or available for land swap. Alec Williams needs to be told that McCall is not where he gets to build his own version of Montana’s Yellowstone Club or California’s Santa Lucia Preserve.

Elected officials need to be called out when they exhibit moral cowardice. They need to be called out when they forget their duty of Public Trust. Elected officials need to lead from the front, not hide behind legal concepts that have no basis in the great American West of the twenty-first century. Elected officials need to take off their business suits, put on a wool shirt, lace up a pair of sturdy boots and hike through the woods of these Payette Area Endowment Lands. They need to sleep out on a snowy ridge in late October in pursuit of a bull elk. They need to paddle a canoe quietly past a moose on the meanders of the upper stretches of the North Fork Payette River. They need to feel their quads and lungs burning at the end of a long rigorous hike into a 8000’ elevation mountain lake as they attempt to lure hungry trout to take one of their flies. They need to ponder the question of what it means to serve as an elected official in the great western state of Idaho. They need to ask themselves, “What would Teddy Roosevelt do?”

The designated beneficiaries of these Public Endowment Lands are the school kids. That's who the lands were created to benefit. The Land Board takes great pride every year in presenting a monetary check to our superintendent of public

education from the proceeds of leasing endowment lands. Alec Williams says he must acquire and develop these public lands because the poor school kids need the money. He says it's all about what's best for the kids. That's a pack of lies. I can tell you that these school kids do NOT want their public lands sold off or traded. These kids want to see habitat preserved for deer, elk, moose, owls, and osprey. They want to meet a badger foraging along the side of a marsh below the Crestline trailhead. They want the same access to wild places that their parents and grandparents enjoyed. These kids want to see new housing concentrated down in the level ground of Long Valley, and see the wild forested hillsides that drain into the Payette River Watershed preserved for wildlife and sensible human recreation. They don't want hillside construction of giant homes for wealthy New Yorkers eroding toxins into Payette Lake, the source of their drinking water. It is a violation of the Public Trust for elected officials to consider selling or trading these lands for the benefit of these school kids. The kids just don't want it sold. The kids want to hike and explore and have adventures in the wilderness. It's a huge lie when the Land Board considers selling or trading this land and invokes the excuse that it is best for the school kids.

Trident holdings is a private equity firm led by Alec Williams, a 33-year old Ivy League educated MBA/JD. Alec checked the box on his resume with brief service as a Navy SEAL (as a frogman, Alec was no Bill McRaven, no Eric Olson, no Chris Kyle, no Matt Burns). I served as a SEAL myself and we've all seen Alec's type before. Most recently, we witnessed disgraced Missouri Governor Eric Greitens, a fame-seeking former frogman with impaired integrity and unbridled ambition who was forced out of office over nude photos of his tied-up girlfriend. Alec came to Idaho with degrees from Princeton, Yale and Harvard. Now he's trying to capitalize upon, and sell the SEAL brand (the gold emblem affectionately known as the "Trident"). After getting his Harvard MBA, Alec cut his teeth in New York working for private equity and most recently working at Table Management LP, a firm that manages the personal wealth of hedge fund billionaire Bill Ackman. Alec is intimately connected with New York private equity firms. After not quite a year of working for Bill Ackman, Alec has now landed in Idaho and assembled financial backing and a high-priced team of lobbyists and lawyers and attempting to portray himself as a local boy trying to preserve 28,000 acres of the public land.

The current lobbyist team helping out with this attempted theft of public land includes lobbyists from the firms of Russell Westerburg and Sullivan-Reberger. Here is the current lineup of lobbyists registered with Trident: 1) Brody Aston, 2) Phil Reberger, 3) John Sheldon, 4) Patrick Sullivan, 5) Kylie Turner and 6) Russel Westerberg. I encourage all public land minded Idahoans, all those who love wild places, to contact these two lobbying firms and let them know that you find their representation of Trident Holdings in their attempted land grab to be morally reprehensible. Let them know that there is right and wrong, good and bad. Make these lobbyists aware that their job description does not excuse them from the responsibility to do what is morally correct. Call them out. If you know one of these lobbyists, tell them to drop Trident as a client. There is plenty of morally responsible legislation that needs to be enacted. The theft of public land around McCall for a new version of the Yellowstone Club is not morally responsible. Track down these lobbyists, shine the light of public scrutiny upon their actions, tell others about their actions, call them out, hold them accountable.

Regarding revisions to the current draft of the PELS document:

The Department of Lands needs to continue an ongoing close dialogue with local government (Valley County Commissioners and McCall City Council) and with the Payette Endowment Lands Stakeholder Advisory Group going forward. The department should continue its work with Payette Endowment Lands Alliance, Backcountry Hunters and Anglers, Idaho Wildlife Federation, Idaho Conservation League, Payette Land Trust, Greater Payette Water Quality Council, Brundage Mountain, and local homeowners associations.

The Department should engage the school kids of the McCall-Donnelly school district (these are the financial beneficiaries of the Endowment Lands) and ask them where they like to go and what they like to do on the endowment lands. Find out what's important to the kids. Within a generation the members of the Land Board will have passed, and in thirty years, some of these current school kids will be working at IDL, or have a job with the forest service, or be elected to public office. One of these kids from some elementary school in Idaho will at some point become our governor. The torch will pass to a new generation of Idahoans. Meet with these high school and elementary school kids.

Find out what the endowment lands across the state mean to them. Find out what sort of future they want to see for the McCall area.

The Department needs to slow down! The Land Board's job is to maximize LONG TERM financial return. There is no point in liquidating land that is rapidly appreciating in value. Idahoans have owned this land since statehood. There is absolutely NO RUSH to do anything right away.

The Department needs to explore conservation easements and recreational leases as a way to help returns while continuing with traditional revenue sources like grazing and logging leases.

The Department must consider the cumulative impacts to other trust responsibilities such as water quality, fish and wildlife resources. Open space, clean air, clean water and access to abundant public lands, are what drives the same markets responsible for the appreciation of endowment lands.

The Department must get this plan right. The plan will require teeth that will prevent future Private Equity firms like Trident Holdings from making attempts at land grabs for all the other attractive public endowment lands across the state. It must be clear in the plan that Idaho is not going to ever consider swapping thousands of acres of the public land anywhere to benefit developers seeking a quick profit from the acquisition of land for pennies on the dollar. The final version of this PELS document must have teeth and an enforcement capability such that IDL can say to future firms like Trident Holdings, "Sorry Trident. Idaho is just not accepting your application for a 28,000 acre land grab. Your proposal runs against our strategy for these lands. Consider trying your luck with the officials in Montana or Utah."

This issue needs to remain in the open light of public scrutiny. I support groups like Payette Endowment Lands Alliance (PELA), Backcountry Hunters and Anglers (BHA), Idaho Wildlife Federation (IWF), Idaho Conservation League (ICL), Greater Payette Water Quality Council (GPWQC), Payette Land Trust (PLT), Brundage Mountain, and local homeowners groups. I support continued engagement with local government; Valley County Commissioners and the McCall City Council. I support the clear consensus reached by the IDL's own Payette Endowment Lands Focus/Advisory Group's work this past month.

I look forward to seeing IDL officials and Land Board elected officials exhibit the maturity and moral courage necessary to do what is right and send these private equity land developers like Trident Holdings and Alec Williams packing back to New York. Idaho for Idahoans. Keep Public Lands in Public Hands.

Respectfully,

Thomas Manning MD, PhD
Boise, ID
McCall, ID

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:25 AM
To: Comments
Subject: Comment Submitted

From: Lawrence Smart at a.lawrencsmart@gmail.com
Phone: 2083153677
Address: PO Box 1674
City: Hailey
State: Idaho
Zip Code: 83333

Comment:

Dear Land Board Members.

I want to express my opposition to any land swap with private investors in the McCall area. I understand your mandate too use the lands to fund tings like schools etc. You mandate also states that you must manage them for long term financial return. Please take the long view on this matter and look at the long term, longer than your life or your children's and grandchildren's lives. This valuable public land around McCall will be there for centuries unless you decide to sell it to profiteers.

with respect,

Lawrence Smart, Bellevue, ID

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:29 AM
To: Comments
Subject: Comment Submitted

From: Maggi Trimble at mbtrimble91@yahoo.com
Phone: 4406221083
Address: 2100 Park Ave, Unit 68284
City: Park City
State: Utah
Zip Code: 84068-4615

Comment:

I am an active outdoor enthusiast and a water conservationist, currently working as a water engineer. This public land provides recreational opportunities and provides protection to the water ways and Payette Lake. Please prioritize protecting this public land for the benefit of all the people, instead of selling it off to only benefit one wealthy develop company. By protecting the public land, it will allow for the continued protection of the water ways and Payette Lake.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:36 AM
To: Comments
Subject: Comment Submitted

From: Kristal Kangas-Hanes at kkangashanes@yahoo.com
Phone: 2083258136
Address: P.O. Box 94
City: Donnelly
State: Idaho
Zip Code: 83615

Comment:

Ladies and Gentlemen,

Being a descendent of homesteaders in Round Valley and the Finnish community in Lake Fork I have called Long Valley my home for 60 years. In my lifetime I have been saddened as large swaths of land once open to the public by public ownership or by good-neighbor access has diminished here and in Idaho. Places my grandparents accessed in their later years are now gated, blazed, and marked with private property signs. The Long Valley of my childhood is evaporating. I am asking you to use our endowment lands to the benefit of generations to come. You have the power to act to endow our great-grandchildren with public access lands in VALLEY COUNTY , an endowment that exceeds any fiscal gain Idaho's citizens would temporarily experience at this time. I implore you to resist any deal which strips our region of public access to Idaho's gem, her forests.

Thank you for your stewardship in Idaho's unique lands.

From: Jan Stein <Jan.Stein.344272558@p2a.co>
Sent: Monday, March 1, 2021 7:36 AM
To: Comments
Subject: Payette Endowment Lands

Dear Governor Brad Little and Members of the Land Board,

I am third generation Idahoan & very proud of my State. What keeps me here, contributing to my community in as many ways as I can, is the access to public lands. Nature is a healing source, it helps me stay calm & clear, so I can better serve my community, friends & family.

More development around the lake will ruin that beauty. There are very few places we can currently access the lake. Please leave what is left of open space around the lake open so people who cannot afford to live on the lake can have access. I appreciate your consideration & am willing to help find alternative solutions to raise revenue
Jan Worsencroft Stein

Regards,
Jan Stein
708 Reedy Ln
Mccall, ID 83638

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:48 AM
To: Comments
Subject: Comment Submitted

From: Mike Filbin at mgfilbin@gmail.com
Phone: 2089657832
Address: PO Box 1122
City: McCall
State: Idaho
Zip Code: 83638

Comment:

A Conservation Easement Option seems like an extremely beneficial solution for both the Payette Lakes area and the State of Idaho, which could serve as models for other areas around the state. More time for to develop the PELS would be wise as the implications are going to go long beyond our lifetimes. Conservation Easements have been used elsewhere to allow traditional uses to continue (recreation, timber, grazing), while generating revenue for the Endowment at fair market value. Please consider these alternatives as these lands serve many purposes for the citizens of the McCall area and Idaho as a whole.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:48 AM
To: Comments
Subject: Comment Submitted

From: Nicholas Monahan at nckjames7@tutanota.com
Phone: 2086348461
Address: PO Box 1667
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Please, please consider a conservation easement option for McCall and its environs. We have seen America's environment ruined in state after state, and now we're reaching the end point. Idaho has a chance to be truly different and as far-seeing as Senator Frank Church.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:54 AM
To: Comments
Subject: Comment Submitted

From: Kelly Clark at kcclark@citlink.net
Phone: 208-634-7775
Address: P.O. Box 1832
City: McCall
State: Idaho
Zip Code: 83638

Comment:

This plan for the Payette Endowment Land is a bad idea for Idaho. To trade some land that has some trees on it for one time logging profit is not the way to help Idaho, McCall, or our schools. The land in northern Idaho has it been properly managed, and or been logged in the last 50 to 60 years? How about if you want to do something with the Endowment land around McCall sell off small tracts of land so development can be done slowly and correctly with planning and not what looked like a backroom deal as this proposal first started.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:58 AM
To: Comments
Subject: Comment Submitted

From: Bobbi Bullock at bobbiabullock@gmail.com
Phone: 2083710404
Address: 1815 N 12th St
City: Boise
State: Idaho
Zip Code: 83702

Comment:

I vote to keep these land public and preserved, safe for wildlife. I do not want them sold up privately. I want the best interest of wildlife and community at the forefront thank you

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:18 AM
To: Comments
Subject: Comment Submitted

From: Brad Stein at bradstein7@me.com
Phone: 2088615451
Address: POB 1665
City: Mccall
State: Idaho
Zip Code: 83638

Comment:
Honorable Department of Public Lands,

I'm writing today about the sale or trade of the public land around and near Payette Lake. I'm a long-time/full time resident of the Mccall area. I'm not wealthy. I own a simple home. I'm a tax payer. I close to live here because of the quality of life that the Mccall area provides: access to the lake and public land, the "wildness" surrounding the lake, and the critters like the moose that LIVE IN THE MEANDERS , which are the North Fork of the Payette river, the inlet that feeds the lake. With the sale or exchange of these state lands obviously the characteristics of the things I've mentioned will be changed. Changed by developers who will say they want to preserve the beauty, the wildlife and quaintness of the area, but they're really only interested in making money off of the area. Even in the last year I've seen huge changes in what used to be the quiet little burg of McCall. A Huge influx of tourists. Speeding cars and Trucks. Property values that have grown so high that locals can hardly keep up. Rapid development. A ski hill that is bursting at the seams-actually has to turn skiers away because there is no room for them in the parking lots or on the lifts!
I don't want to see our area turned into another Aspen. It will be ruined.

I encourage you to consider the people here who have skin in the game, not the developers who only want to make a profit.
To consider the long-term contribution of recreational dollars coming into the state rather than the short-term profit of development which will ruin what people actually come here for.

Please don't hurry into this. Please don't sell or trade the land.

Sincerely,
Brad Stein
708 Reedy Lane, Mccall, Idaho
POB 1665 Mccall, Idaho 83638
208 861 5451

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:25 AM
To: Comments
Subject: Comment Submitted

From: Autumn Street at autumnbeto@gmail.com
Phone: 2086027702
Address: 1415 W Fort St
City: Boise
State: Idaho
Zip Code: 83702

Comment:

Hello, my mailing address in Boise, but I am a part-time resident in McCall at our family home on Lake Street. I urge you to consider the future impact of this land trade, and the privatization of what has been publicly accessible for countless generations of Idahoans. Please, do the right thing for McCall and do not allow the last remaining natural landscape on the lake that has historically be enjoyed by so many to become butchered up and developed into multi-million dollar estates that are accessibly only to a very few elites – who likely will not live in McCall or contribute to the community. Save Payette Lake. Save McCall. Save Idaho.

Thank you.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:31 AM
To: Comments
Subject: Comment Submitted

From: Dian Cenar at dcenar@hotmail.com
City: Boise
State: Idaho
Zip Code: 83702

Comment:

Please do not sell off this beautiful area. It can never be replaced! You cite income for schools, but what about increased number of families? Have you taken into consideration the money that outdoor enthusiasts bring into the area?

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:46 AM
To: Comments
Subject: Comment Submitted

From: Mike Miller at mmbackpacker@hotmail.com
Phone: 208-447-9773
Address: 8001 S Topaz Ridge Ave
City: Boise
State: Idaho
Zip Code: 83716

Comment:

Thank you for the opportunity to comment. I am a native Idahoan and the lands that I visit and recreate on are a passionate topic for me.

Please slow down! The constitutional mandate requires maximizing long-term financial return. Why does the strategy have to be a real estate plan that establishes means for liquidating rapidly appreciating values.

Work with stakeholders, local, regional and national land trusts to create a model for conservation easements on endowment lands. Conservation easements provide a market-based financial return, while maintaining traditional revenue sources like grazing and logging. Recreational leases can also be added to the asset portfolio, thus providing sustainable long-term returns.

Consider the cumulative impacts to other trust responsibilities such as water quality, fish and wildlife resources. Open space, clean air, clean water and access to abundant public lands, waters and wildlife are what drives the same markets responsible for the rapid appreciation of endowment lands.

Consider how this strategy may be applied to other endowment lands in the state that could potentially be "underperforming"

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:57 AM
To: Comments
Subject: Comment Submitted

From: Lorin Port at lorin.port@gmail.com
Phone: 760 845-3808
Address: 3348 W Anderson St
City: Boise
State: Idaho
Zip Code: 83703

Comment:
Please keep this land public use and retain the charm and character that we all love about McCall! Thank you!

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:03 AM
To: Comments
Subject: Comment Submitted

From: Molly Lukes at mollypantz@yahoo.com
Phone: 2089082551
Address: 1606 Aliso Dr NE
City: Albuquerque
State: New Mexico
Zip Code: 87110

Comment:

I am writing to provide comment on the Payette Endowment Lands Strategy, that outlines the sell off and leasing of some of the most treasured areas around Payette Lake. I was troubled to learn that this plan does not consider the needs and desires of the local people of McCall, but instead favors sell off to the highest bidder, regardless of their stake or involvement in the community. I grew up in McCall and I return every summer for 6 weeks or more in the summer and winter to spend time in my favorite place on earth recreating in and around the lake for the majority of my time there. Many of my fondest memories are embedded in places at risk for takeover in this plan- the cliffs I frequented in elementary and high school and the islands off of Paradise Point. I was married on one of the islands that could be sold and my husband and I do a canoe trip out there every year to mark our anniversary, a tradition that would be cut off completely if the island were to be sold to an out of state investor. There is no way an out of state interest would account for the sentimentality and attachment to place (that I share with so many others that have called McCall home) in their quest to make the most profit out of sale or development. I would urge you to instead develop a comprehensive plan that benefits Idahoans and takes into account the diverse benefits and uses of the land into consideration, not just a sell off for short term gains that ignores potential costs as well. In addition, create a stakeholder advisory committee that demonstrates that you understand and value the opinions of those most likely to suffer the fallout of a poorly developed plan- the people who live in the McCall community are innovative and far-sighted in a way that no outsider could be, as it is their future that the plan affects. The future of our beautiful lake is in your hands- please consider its long term health, and the long term health of the community in your plan.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:04 AM
To: Comments
Subject: Comment Submitted

From: Dave Kangas at davekangas@msn.com
Phone: 208410580
Address: 1715 W Canal St
City: Boise
State: Idaho
Zip Code: 83705

Comment:

I believe a well thought out, well planned, "Planned Community" is the answer to this dilemma. The key is to not make quick or rash decisions and to listen to all stake holders. This is not a race, but a long endurance walk for future generations. Planned communities have the ability to protect vast amounts of open space in exchange for islands of development. PUBLIC ACCESS HAS TO BE PROTECTED. There are examples of HOA's blocking out access despite access agreements.

From: Sid Anderson
Sent: Monday, March 1, 2021 10:07 AM
To: Renee Jacobsen
Subject: FW: Payette Endowment Lands
Attachments: IdahogDepartment of Lands.docx

From: Albert Becker <ahbecker@frontiernet.net>
Sent: Monday, March 1, 2021 9:08 AM
To: Scott Corkill <scorkill@idl.idaho.gov>; jnjdroubay@gmail.com; Albert Becker <ahbecker@frontiernet.net>; Brian Brooks <bbrooks.iwf@gmail.com>; Sid Anderson <asanderson@idl.idaho.gov>
Subject: Payette Endowment Lands

Attached are my comments regarding the Payette Endowment Land Strategy Draft Plan. I copied and pasted them to the Web site Comment box, but not sure if they actually made it in readable form. Any questions, contact me by e-mail or 208 315-3627. Thank you, Albert Becker

February 26, 2021

Re: Payette Endowment Land Strategy Plan

Dear Idaho Land Board Commissioners,

I appreciate the opportunity to comment on this Draft Plan. Overall, I support the strategy of separating parcels into four tier groups with timeframes to consider land transition to a higher or better use based on the parcel location, attributes and Endowment Land objectives. However, these land parcels have values beyond marketable real estate. Their disposition must also consider their ecosystem value in the Payette Lake area, e.g. wildlife habitat, migration corridors, water quality, juxtaposition to private or other public lands, their key part in natural recreation area amenities, the part they do or could play in public access to other adjacent public lands, etc.

I feel I should qualify myself why I would like to comment on this Draft Plan. I have worked 34 years professionally in Natural Resource Management on public lands in three western states, the last 23 of those years in this area on the Payette National Forest. I then worked 8 summers for McCall City assisting recreation facility management and noxious weed control.

I do not support disposition of Parcel A. Department of Lands should continue to use this as a center for their Supervisory Office with leases to other Resource offices, e.g. IDFG, SITPA. It is currently well situated for the services it provides. Don't change a 'good thing'. Parcel B should be moved to Tier I for short term disposition. However, I feel the DOL needs to coordinate with the City of McCall to include any recommended covenants such as parks, open space, pathways, etc. they may have. I have no comments for other parcels in Tier I.

Disposition of Parcel C in Tier II needs to be closely coordinated with Ponderosa State Park. Prior to a decision to include Parcel C in Tier II (Probable Transition) Ponderosa Park may have key concerns for public pathways, restrictive covenants, water quality (surface and ground), etc. to maintain their high Park investment at stake.

I have no comments regarding current and future land use of parcels designated in Tier Group III.

It is important to not change the land use in the larger State Land Parcels around Payette Lake in Tier Group IV. Keeping them in Ag-Forest Conservation is paramount for protecting Payette Lake water quality and their wildlife habitat value. Public access to the beach may need further development and/or increased management. However, I do disagree with the future land use of Low Density Residential in Parcel L. There is considerable current development on private parcels adjacent to the lake and/or State land and increased development would jeopardize water quality and wildlife habitat. A key element that could be done at the boundary of Parcel L is resolve the lack of R-O-W on the Green Gate Road. This road once served considerable recreation access onto adjacent National Forest land. A partnership with the Payette National to purchase an easement or build an alternate route thru State Land may be possible.

In summary, I feel it is of paramount importance to maintain or improve the ecological value of State lands around McCall and I support disposition of some lands that may provide a higher use and economically benefit objectives of Endowment Lands.

However, I do not support disposition of any State lands outside of the 5,478 acres considered in this Plan. The State IDLs needs to continue a moratorium on future land dispositions until it reviews the land asset category land management process. Land asset classes have changed significantly since the current program was adopted.

If you have any questions on my comments please contact me at 208 347-2346 or ahbecker@frontiernet.net. Again, I appreciate the opportunity to review and comment on your Plan.

Sincerely,

ALBERT BECKER

Cc IWF- Brooks
J & J Droubay

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:22 AM
To: Comments
Subject: Comment Submitted

From: Arthur Troutner at atroutner@hotmail.com
Phone: 208-630-4627
Address: 193 West Lake Fork Rd
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Thank you for this opportunity to comment.

– I am not in favor in the sale of the Endowment Lands but in the event that such occurs I would favor the creation of a conservation easement option that would keep land open for the traditional public uses.

-I think the moratorium needs to be extended to allow a more thorough development of protocols to address this and future efforts to change the uses or ownership of Endowment Lands.

– Please consider the use of conservation easements in the the event of a sale. They are a useful tool that the State could use to generate income from the sale of endowment lands as they are sold at market value. They can also be used to preserve traditional public uses such as hunting, fishing, skiing, hiking etc.

– Please allow enough time before coming to a decision to allow for the development of a model that can preserve the land for traditional uses AND bring revenue into the state endowment fund. A good model could be used for future transactions for the benefit of communities throughout the state.

-The most favorable option is to keep the lands lands in the Endowment Portfolio. This gives the State opportunity to receive future revenue from endowment lands. As time goes on and opportunities for revenue change the State can make adjustments as needed to respond to future needs. If the land is no longer in their control then the opportunities are missed.

Thank you for your consideration,

Art Troutner

–

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:26 AM
To: Comments
Subject: Comment Submitted

From: Tara Woods at Tara.maline.woods@gmail.com
Phone: 2086346594
Address: 517 Brundage Dr.
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I first arrived in McCall as an AmeriCorps volunteer in 2005. Since then I found a full time job as a public servant in McCall, an Idaho boy to marry, a house to renovate and together we have a 9-year old son to explore with. It is important to me that we have public lands available close by to explore by land and water. My son, in his little time here on earth, has explored Payette Lake and considers the shores and water is treasures; from making clay pots to paddling out to the islands he is right to think these waters and shores belong to everyone. Not just him, not just locals, not just visitors, but to anyone who dares to make the adventure. Please don't take this shores away from us, they are all our treasures. Thank you for your time.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:36 AM
To: Comments
Subject: Comment Submitted

From: Andrea Umbach at andreaumbach@hotmail.com
Phone: 2068502537
Address: Box 172
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I am forcefully opposed to the Land Board's consideration of developing the endowment lands via the Trident proposal.

1. The people of McCall should determine the development of our community, not those who live outside of our community who fundamentally do not have a concern for our quality of life and our future.
2. We have seen around the country the rapid growth of the US wildland-urban interface (WUI = housing developments encroaching in wildland areas) drastically raising wildfire risk. This has been devastating in Oregon, Wa, and California. Why in the world would we in McCall invite this prospect of increased wildfire, property destruction, uncontrolled fire damage, and human tragedy to our community? Science and data are telling us to do the exact opposite.
3. By removing these endowment lands from the general public and developing the wildlands surrounding McCall, the land board is literally cutting out the heart of the beauty and recreational attributes of our area. We should be actively preserving these areas for the future of our area, not developing them.
4. We need housing for those who live and work in our community. The development of these lands is targeted to developers, tourists, 2nd home owners, and prospectors. Development of 2nd homes and vacation home rentals to cater to a large population of people who have moved to McCall has already has profoundly changed the economics of the community. We should be focused on providing affordable housing and preserving the quality of life we cherish.
5. The infrastructure development required to develop these endowment lands is huge. It is also deeply impactful to the surrounding areas and again impacts quality of life.
6. We have many many other lands that could be developed for housing that are more fire-safe, more linked to the community and commercial areas, and attached to existing infrastructure. Urban development practices tell us this is the way to grow a community, not tearing out wildlands and recreational areas that give a community its quality of life.
7. We need to be looking at how communities can sustainably grow, not how we can mine dollars and devastate wildlands.

I humbly submit these comments and deeply hope you consider rejecting the development of these endowment lands. Idaho is better and smarter than this proposal. Andrea Umbach

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:41 AM
To: Comments
Subject: Comment Submitted

From: Douglas Smith at rigney.smith@gmail.com
Phone: 2089571891
Address: 901 N. 16th Street
City: Boise
State: Idaho
Zip Code: 83702

Comment:

For the Idaho Land Board members I offer the following comments without belaboring the point too much. As a longtime Idahoan with residents in Boise and McCall, I've witnessed over numerous decades the slow and subtle change of this state. Some of it has been good and some of it has been bad as precious and finite resources year after year have been gradually consumed in the name progress and financial growth. While I understand that progress and growth is inevitable, should it be at the behest and compromise of what makes Idaho such a great state? Consider the true and irreversible implications of your decisions as you approach the endowment lands surrounding Payette Lake. Once they're gone, they're gone for good! I've seen this occur all over Idaho in the past four and one-half decades and many of the activities or locations where I enjoyed those activities has become either severely restricted, awkwardly regulated, void of the freedom of access, or nonexistent all together. I've had the pleasure of growing up in Idaho and enjoying the public access lands, yet sadly I also have perspective from the past and seen the change. My children, grandchildren, and your follow on generations should be equally afforded the those same opportunities of public access lands. Don't let your politics get in the way of making the prudent decision towards lands that for our future generations need to enjoy.

Respectfully, A Very Concerned Idahoan

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:42 AM
To: Comments
Subject: Comment Submitted

From: Robert Burns at burns.r.t@me.com
Phone: 2084888126
Address: 5320 Valle Grande Dr
City: Meridian
State: Idaho
Zip Code: 83642

Comment:

As a life long, 72 years, Idahoan, I object extremely, to this land grab by unknown interests. I discovered this last summer, people from Texas are blocking roads to our lands. Stop this immediately.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:47 AM
To: Comments
Subject: Comment Submitted

From: todd cook at mtnsnowave@yahoo.com
Phone: 2083151972
Address: po box 409
City: new meadows
State: Colorado
Zip Code: 83654

Comment:

PLEASE don't do this, keep this out of the hands of developeers. We cherish our public land around the lake. I am willing to pay an access fee if need be to keep this from being developed. Would prefer it be transferred to state park or a conservation easment.

This will ruin McCall if it goes through and i can't even begin to think about the environmental aspects of development in these large parcels proposed!

Todd Cook

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:49 AM
To: Comments
Subject: Comment Submitted

From: Catherine Galdos at cgaldos1020@gmail.com
Phone: 2088504137
Address: 4396 W. Castlebar Ct.
City: Boise
State: Idaho
Zip Code: 83703

Comment:

As a multi-generational native of family with long-time vacation homes in McCall and relatives who generationally have lived there full time, we are all appalled by this proposed land swap. You would be selling out Idaho AND its children by allowing these out-of-state interests to use an arcane law to force approval of their development scheme. It will enrich them at everyone else's expense except the few out-of-state rich people who will be able to afford the vacation homes they'll build. Payette Lake is not big enough to sustain more cabins which will leach more nitrogen into the lake with landscape, pollutants with boat traffic and dog waste, and traffic congestion on Highway 55. This proposal benefits a few rich people at the expense of generations of Idaho kids who will be locked out of access. There are alternate proposals out there regarding educational revenues. Don't sell off the most precious thing in Idaho: its public lands. Don't leave that heritage for yourself or your grandkids, that you were the ones to sell out the heritage. Once gone, it can never be reclaimed.

From: Tammy Armstrong
Sent: Monday, March 1, 2021 10:10 AM
To: Tera King
Cc: Tom Schultz; Renee Jacobsen; Kellie LaBonte
Subject: FW: PELS Plan Comments
Attachments: Payette Endowment Lands Strategy Plan_IFG comments.pdf

Good morning Ms. King:

Thank you for submitting your comments. I am forwarding your attachment to Renee Jacobsen and Kelli LaBonte as they are the individuals that are overseeing the comments through our on-line process.

Regards,

Tammy Armstrong

Tamara L. Armstrong
Real Estate Program Specialist

Idaho Department of Lands
300 N 6th Street, Suite 103
Boise, ID 83702
208-334-0215

From: King, Tera <tera.king@idfg.com>
Sent: Monday, March 1, 2021 9:49 AM
To: Tammy Armstrong <tarmstrong@idl.idaho.gov>
Cc: Schultz, Tom <tom.schultz@idfg.com>
Subject: PELS Plan Comments

Good morning,

Please accept the attached as Idaho Forest Group's official comments on the Payette Endowment Lands Strategy Plan. If you have any questions, please let me know.

Thank you,

Tera R. King
Resource and Business Analyst
208-816-3474



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Idaho Forest Group, 687 Canfield Ave., Coeur d'Alene, ID 83815 www.idfg.com



687 W Canfield Ave Ste 100

Coeur d'Alene, ID 83815

IDFG.com

208.255.3200

March 1, 2021

Submitted via email:

RE: Payette Endowment Lands Strategy Plan

Dear Director Miller,

Thank you for the opportunity to participate in the Payette Endowment Lands Strategy (PELS) Plan focus group. The information provided by your staff as well as the discussion of the panelists was very helpful in understanding the constitutional mandate of Land Board as well as the various concerns related to management of endowment lands by the Idaho Department of Lands within and surrounding the city of McCall and Payette Lake.

Idaho Forest Group (IFG) is one of the largest producers of softwood lumber in the U.S. with six manufacturing facilities in Idaho and Montana capable of producing well over 1 billion board feet of lumber annually. Our 2,000+ employees, contractors, and other service providers live and work in the mostly rural communities surrounding our facilities where forestry as well as recreation and tourism are significant components of the economy and influence their quality of life. Endowment lands in Valley County, including those surrounding Payette Lake, are directly contributory to the woodbasket for our sawmill in Grangeville, Idaho and we have a long history of purchasing timber sales from the Payette Supervisory Area. Evergreen Forest Products in New Meadows and Woodgrain in Fruitland, Idaho are also highly dependent on forest products from the Payette Supervisory Area. Transition of timberland assets in this Area to non-traditional, non-timber uses would impact all our facilities' ability to operate over time.

The current draft of the PELS, while potentially lacking some important details, effectively lays out strategic guidance for the Department and sets up a phased timeline for consideration of individual parcels in an area of very concentrated development and/or public use. Tier 1 and 2 identify parcels with the most development pressure and highest likelihood of a benefit to the trust by transition to a different asset class (non-timber) or disposition. Tiers 3 and 4 bucket parcels that may be considered for transition in the future but are managed within their current asset classification. This approach allows for management decisions to be made on a parcel-by-parcel basis at the appropriate time without foregoing currently unknown or future potential uses or revenue streams. It also offers flexibility as factors like technology or use patterns change and slows the transition of working forest lands that also have very high intrinsic values for recreation and other mutually inclusive uses around Payette Lake.

The intent of the PELS is to provide management guidance on a specific 5,478 acres where the higher and better use values are significantly higher than traditional asset classifications and revenue generation is either not commensurate with values or is impaired by surrounding urbanized uses. While the need for a Plan is clear, our primary concern is that the PELS document establishes precedence for endowment lands statewide. The concept that any "underperforming" timberland parcel in the State may become subject to designation as "transition", i.e. considered for disposition/exchange or another non-timber asset classification, opens the flood gates for deterioration of trust lands as working forests. Any given parcel's



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Coeur d'Alene, ID 83815

IDFG.com

208.255.3200

timber value will fluctuate with market conditions over time and may occasionally be less than its appraised market value under some other use. It will also fluctuate as management activities occur. For example, a recently harvested parcel near a rural community will likely have more value as a rural recreational or residential parcel until the merchantable value of that timber is reestablished. Additionally, as many on the focus group articulated, the process of determining the revenue generating contribution of a particular parcel when appreciation or other non-timber values cannot be considered puts Endowment lands at a disadvantage when compared directly with higher and better use market values.

There should be opportunities to consider other uses for certain parcels as land uses, development, new markets, or other conditions change. That said, appreciating land values should be considered as a benefit to the whole trust and the State of Idaho, not a complication or cause to initiate consideration for transition or disposition. These same parcels often have a multitude of overlapping benefits. In addition to sustainable timber harvest, they are likely to have very high recreational or open space value, they likely prevent urban sprawl in the wildland urban interface, and/or they may serve as a buffer for water quality protection or a number of other issues arising from development pressure. We understand the Land Board's fiduciary duties to each individual endowment and appreciate the management conflict, but we also believe the intent of the asset management philosophy favors maintaining land holdings in perpetuity to diversify the portfolio, reduce risk, and protect against inflation rather than setting a precedence that would lead to further transition of supposedly "underperforming" parcels all over the State.

Based on the discussions of the PELS focus group, there are clearly several potential proposals that would help the Department enhance land values on several of the state-owned parcels identified in the PELS, including but not limited to conservation easements or "stacked" leases. We would encourage the Land Board to give those opportunities time to develop before considering the sale or wholesale exchange of underperforming land assets around McCall and Payette Lake as per the stated asset management goals. Furthermore, the public input and planning process that was undergone by the City of McCall and Valley County in the development of the 2018 McCall Area Comprehensive Plan is exemplary. Where appropriate, the Department should certainly take the recommendations and considerations identified in that document as relevant guidance, particularly because it establishes a very clear, publicly supported vision for growth and development within the McCall Impact Zone and because they have a thorough understanding of the water quality and other issues that affect Payette Lake, all of which are mostly absent in the current version of the PELS Plan.

Thank you again for the opportunity to participate in this process and on the PELS focus group. We appreciate your consideration of our comments and welcome further discussion.

Sincerely,

Tom Schultz
VP of Resources and Government Affairs

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:54 AM
To: Comments
Subject: Comment Submitted

From: Leslie McMichael at leslie@taisiedesign.com
Phone: 2088909757
Address: 2681 PAINTED RIDGE LN
City: CAMBRIDGE
State: Idaho
Zip Code: 836105033

Comment:

My name is Leslie McMichael. I've been an Idaho resident for the past 40 years and have enjoyed recreating on Idaho State Endowment lands around McCall for the past 35 years and especially the state lands at the base of JugHandle Mountain.

This land exchange with Trident Holdings is a TERRIBLE idea. The land around McCall that belongs to the State of Idaho is too valuable and you can't put a price tag on the value of public recreation and quality wildlife habitat.

Why would you think it's invaluable and should be sold off? Isn't that how it works? You need to maximize revenue when something is deemed invaluable you get rid of it. This land is priceless. The developers know that why do you think this whole swap idea got started in the first place.

This swap is anti-public recreation disguised as a nice package that sounds good but in reality once something is sold off access to get to National Forest by crossing through the land now owned by Trident will eventually be blocked for future generations of Idahoan's

For once can't you realize that public recreation for poor people who can't afford to even think of moving their family to McCall anymore is more important than money in the pockets of rich people that aren't even Idaho residents that want to build fancy seconds homes on this land you want to swap.

Please don't SWAP.

Mrs. Leslie McMichael
Cambridge, Idaho

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:08 AM
To: Comments
Subject: Comment Submitted

From: Katy Decker at katymariedecker@gmail.com
Phone: 650-906-8487
Address: 5001 W Wymosa St
City: Boise
State: Idaho
Zip Code: 83703

Comment:
Public Lands are one of Idaho's greatest resources. I encourage you to maintain the undeveloped nature of this land in the immediate McCall area.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:08 AM
To: Comments
Subject: Comment Submitted

From: Autumn Freeland at autumnfreeland@hotmail.com
Phone: 2089918607
Address: P.O. Box 4265
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Dear IDL,

Thank you for the opportunity to provide local opinions regarding the proposed trident land swap. Myself and my family are opposed To the land swap in favor of exploring other options that may provide better long-term public usage and protection of that precious and limited resource.

Sincerely,

Autumn Freeland and Family

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:22 AM
To: Comments
Subject: Comment Submitted

From: Tracey Kindall at traceyparkerkindall@gmail.com
Phone: 208-271-6583
Address: P.O. Box 326
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I have been a resident of McCall for 21 years. For twelve of those years, I was the executive director of the McCall Arts and Humanities Council, which gave me an opportunity to hear from and develop relationships with a number of community members across multiple sectors. Through our programs, I became very familiar with our region's history, heritage, growth cycles, and challenges. During my residence in McCall, I've also worked with a variety of other nonprofits as a volunteer, grant writer, and program director. I've raised three children here, too. We've treasured our ability to regularly enjoy such treasures as the Cliffs, Fireman's Point, the Green Gate area, and Thinking Spot. All of these experiences have collectively shaped my commitment to my community and form the center from which my request arises.

As someone who cares deeply about my community and its unique and beautiful home, I urge you to consider the following in the creation of a Payette Endowment Lands Strategy:

- Please take care at this point to align endowment lands management with 21st century realities. Idaho has become a target for growth and development. It's your job, ultimately, to protect and manage Idaho's lands in perpetuity for Idahoans, NOT for the benefit of out-of-state investors eager to exploit this moment in time.
- Please develop a comprehensive plan for these lands that takes into consideration the long-term health of the Payette Lake watershed, the economic health of the McCall area, and the viability of these lands to provide conservation and recreation value into the future.
- Please take time to explore fruitful long-range investment strategies for these valuable lands that may well be in the better interest of the state than a quick sale.
- Please create an advisory committee of local stakeholders to help develop a plan for these endowment lands that will be in the best interest of all parties, protect the interests of Idahoans, and could serve as a template of management for other state lands.

Thank you for listening to my concerns as a deeply committed Idahoan, and for taking your power and responsibility at this moment seriously. You are shaping the future for all of us.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:23 AM
To: Comments
Subject: Comment Submitted

From: Aaron lowe at banditaaron8@gmail.com
Phone: 2088100990
Address: 1809 s Columbus street
City: Boise
State: Idaho
Zip Code: 83705

Comment:
Keep public lands in public hands!

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:25 AM
To: Comments
Subject: Comment Submitted

From: katie fite at katiemesa@gmail.com
Address: 1006 n 5th
City: Boise
State: Idaho
Zip Code: 83702

Comment:
I strongly oppose this land deal. Undeveloped wild lands are key to addressing the climate crisis.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:39 AM
To: Comments
Subject: Comment Submitted

From: Alex Kroll at Alex.kroll@gmail.com
Address: 2010 W Cataldo Dr
City: Boise
State: Idaho
Zip Code: 83705

Comment:
I'm an opposed to the land transfer around Payette Lake.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:45 AM
To: Comments
Subject: Comment Submitted

From: Susan Bechdel at bechdelsusan@gmail.com
Phone: 2086344304
Address: PO Box 477
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Thank you for the time you have taken to develop a draft Payette Endowment Land Strategy, for listening to your focus group and for taking my comments.

I am Susan Bechdel, a 36-year resident of Valley County. My family and I chose this place to spend our lives for its recreational and wilderness qualities. Likewise, the economic value of the area is rooted in these attributes.

As you consider the PELS, I urge you to put strong emphasis on the community's economic reliance on outdoor recreation and wilderness values as well as the importance of Payette Lake's water quality as the sole drinking water source for McCall.

In particular, I urge you to thoroughly assess the legal ramifications of violating Idaho Code 39-6601, the Big Payette Lake Water Quality Act.

The legislative intent of that bill states, "The legislature finds that the waters of Big Payette Lake and its watershed are threatened with deterioration due to expanding residential development, greater public use and growing land use activities, that these pressures may endanger the drinkability, economic potential, fisheries, natural beauty, recreational use, swimability and wildlife values of the lake; that the state holds all such public lakes in trust for the use of all its citizens; that to preserve and protect such public lakes and to increase and enhance the use and enjoyment of such lakes is in the best interest of all the citizens of the state; that natural lakes form an important basis of the state's economy and that the increasing demand upon the lake waters of this state require coordinated state and local action to protect, preserve and improve the water qualify (quality) of the lakes.".....

I acknowledge your mandate to maximize revenue; but I also see a clear statutory mandate in this language that concludes 39-6601, "The program as set forth in this act shall require a working partnership of federal, state and local agencies." That includes you.

Keep in mind that this Act was intended to "protect, preserve and improve" water quality that was seen as "threatened with deterioration due to expanding residential development, greater public use, and growing land use activities..." in the early 1990's. That use and deterioration has grown quite a bit since then.

It is incumbent on Idaho Department of Lands and the Land Board to collaborate with agencies to improve the water quality, not put greater pressure on the current situation.

Options to meet both requirements could include conservation easements, recreation leases and state park land allocation.

Again, thank you for your time and your dedication to this important decision.

Susan Bechdel

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:46 AM
To: Comments
Subject: Comment Submitted

From: patrick Wickman at pwickman02@hotmail.com
Phone: 3478860335
Address: 1010 N 8th St
City: Boise
State: Idaho
Zip Code: 83702

Comment:
I am writing to state my opinion against the proposed land swap.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 10:58 AM
To: Comments
Subject: Comment Submitted

From: Daniel Krahn at krahns@frontiernet.net
Phone: 2086342193
Address: 211 E Lake Street
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I support extending the moratorium period to allow for discussion and development of a Conservation Easement Plan with public input allowing for a balanced recreation plan. We all need to develop a proper plan for the McCall area and community that allows for community protections from impacts as well as a balanced financial plan. There are ways to incorporate current best land practices for safe multi-use and not limit the future only as private ownership and development with other financial investors reaping all the profits. There are values to be recognized on timber, education and public uses that need a slow balanced approach and we have the time now to do this process correctly. Thank you , Dan Krahn

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:04 AM
To: Comments
Subject: Comment Submitted

From: Rebekah Hochhauser at rebekahlevyster@gmail.com
Phone: 2085992766
Address: 1312 e spring ct
City: Boise
State: Idaho
Zip Code: 83712

Comment:

Mccall is a magical place where we spend 3-4 months a year. It's a gem for all Idahoans, especially those of us who vacation close to home. We would be willing to pay more to preserve this paradise. Please don't sell paradise to put up a parking lot or condos. You can go to Park City to see how over development makes a beautiful place feel like a pretty Disneyland.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:09 AM
To: Comments
Subject: Comment Submitted

From: Sari Levy at Boyzy23@hotmail.com
Phone: 3038874113
Address: 2703 crane creek dr
City: Boise
State: Idaho
Zip Code: 83702

Comment:

Our family has owned a condo in McCall since 1980. What makes it one of the most special places in the world is the amount of untouched wilderness. As it gets discovered it will be tempting for developers to want to build, build, build. But ultimately McCall will stay special by keeping the wilderness as pristine as possible. That means limiting growth.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:11 AM
To: Comments
Subject: Comment Submitted

From: Gregg Lawley at glawley@gmail.com
Phone: 2083150575
Address: PO Box 4012
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I am in complete agreement with the Payette Endowment Alliance's analysis of the Idaho State Payette Endowment Lands Strategy report. Further more I feel that it is well past the time to update the laws and management goals of the Endowment lands in the state. This is especially obvious to me in places like the McCall area. As a resident and user of Endowment lands around McCall I have seen the explosion in users of these lands. I think it is ridiculous that the overriding management goal is bringing in the most long term money for the state from these lands. The things that made sense 100 years ago don't necessarily make sense in the modern context. The law also needs to recognize the value of these lands from an environmental standpoint. The comments in the Payette Endowment Alliance's analysis relating to these lands and maintaining Payette Lake's water quality is spot on. I hope the Endowment Lands board will look to the future and deny Trident's land swap proposal. Hoping they will also look seriously at updating the law pertaining to the Endowment Lands to bring it in to a more modern context.

Gregg Lawley

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:17 AM
To: Comments
Subject: Comment Submitted

From: Rebecca Standerfer at rebecca@allcalltechnologies.com
Phone: 2085732586
City: Eagle
State: Idaho

Comment:

My name is Rebecca Standerfer and I am an Eagle resident. My family does own a cabin just off of Warren Wagon Road. We vehemently oppose the proposal submitted by Trident Holdings as we are in favor with keeping as much wilderness intact as possible. With the influx of people from other states, moving to Idaho, we are losing open lands in all corners of the state. Those of us who have owned property here are already having to adjust and sacrifice in the name of growth. And the wildlife is dependent on us to be good stewards on their behalf. They need the forests to remain forests with usable passageways for them to get from high to low ground for the various seasons.

We urge you to oppose this proposal!

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:20 AM
To: Comments
Subject: Comment Submitted

From: Julie Manning at j4manning@yahoo.com
Phone: 2085145266
Address: 2000 N 21st St
City: BOISE
State: Idaho
Zip Code: 83702

Comment:

It is imperative that we refrain from treating the distinctive lands around Payette Lake like they are fungible, easily interchangeable assets— no different from parcels of land anywhere else in Idaho and easily bought and sold. They are not!

We must also stop pretending that they are just like financial assets and that it is practical to track the values of the distinctive McCall endowment lands like prices of company shares selling on the New York Stock Exchange. Appraisals and truly competitive auctions are the closest things we have to reliable market valuations of land. But unlike the stock market, land valuations must be deliberately appraised and determined, appraisals are expensive to undertake, subjective, and infrequent. IDL admitted in the Focus Group discussion that the valuations contained in the PELS were outdated, inaccurate and should not be relied upon for lease and sale pricing.

Also, the Idaho Constitution does not mandate a parcel-based or acre-based review of endowment land revenues, and it's unreasonable for the state to do so. Moreover, a parcel-based focus on revenues could easily undermine or outright conflict with the Idaho Constitution's requirement of maximizing long term "returns". We need to do the deep thinking required to figure out the difference and the best way to satisfy the Constitutional mandate of long-term returns.

The law has always recognized that land is unique and accordingly has afforded a special remedy for parties engaging in land transactions when a proposed transaction is breached: it's called specific performance. And specific performance means a court will enforce the original land transaction contract because money damages are not a sufficient remedy or substitute for land. The distinctive lands around Payette Lake are the quintessential example of unique lands that cannot be substituted by other lands or money.

If the Land Board and IDL are looking for ways to generate more revenues on endowment lands, how about building wind farms on rangeland and solar arrays on farmland? This would generate recurring, ongoing, long-term revenues and renewable energy at the same time.

As for the PELS, I have so many things I could say about it, but I will focus now on general principles. First, I appreciate and applaud IDL's efforts to focus on the McCall area and develop a plan to manage these distinctive lands. I also appreciate many of the concepts in the PELS, such as IDL's recognition of: (1) the important comprehensive planning work already completed by McCall and Valley County, (2) the need to be mindful of infrastructure issues including sewers, utilities, and roads, (3) the importance of working with stakeholders to address the state's financial needs and desires, and (4) making any changes to these lands over time and in stages. I also appreciate IDL sharing financial information with the public that gives us clues about how it views these lands.

My suggestions for the PELS are as follows:

(1) Exit the business of treating these distinctive, undeveloped lands as financial assets. And consider dropping assigned “asset classes” to the endowment lands. Why bother? Especially when lands are “transitioning” or useful for lots of different purposes. Alternatively, create a new asset class for the McCall area endowment lands (and other undeveloped, natural lands): classify them as “Distinctive Wildlands” (or something like that). Keep logging. Logging is an activity. It can be done in lots of places, including on Distinctive Wildlands.

(2) Come up with new activities to generate revenues, especially sensible recreation, which is perfectly suited to these lands and can and is taking place currently on the same lands where IDL is engaged in logging and other revenue-generating activities. Consider user fees and park passes for ziplines, camping, hunting etc. If you must.

(3) Choose to protect these lands! Article IX, section 8 of the Idaho Constitution requires the Land Board to provide for the “location, protection, sale or rental ... of all the lands ... granted to or acquired by the state”. Choose “protection”! Adopt policies, regulations, and statutes recognizing that certain endowment lands are most valuable as undeveloped Distinctive Wildlands and hold them to produce the “maximum long term financial return” for the beneficiaries. The Land Board and IDL should also respect the legislature’s intent since 1925 recognizing Big Payette Lake as “a health resort and recreation place” and exercise their discretion on the adjacent endowment lands consistently with this section 67-4302 of Idaho Code.

Then, go generate revenues on endowment lands that are not “Distinctive Wildlands”, which could include the Deinhard 20 (or even 80).

(4) Add a recognition of climate change to the PELS. If this factor is not obvious today (arguably it is), it will be very soon. IDL must continue to manage these McCall endowment lands and the watershed because this stewardship will provide Idaho protection from floods, fires, droughts, and other catastrophes that we may not even imagine today. Just ask Texas. And these efforts, this stewardship, will be worth billions of dollars.

(5) After IDL revises its plan, it should be an enforceable, binding plan, and IDL should use it as a framework for evaluating opportunities on endowment lands.

How to accomplish all of this? IDL is already off to an excellent start with the moratorium, the PELS, and the recently-convened Focus Group, which demonstrated that stakeholders are smart, creative, and willing and able to collaborate in good faith with the IDL. Now, IDL or the Land Board should establish a longer term advisory committee to spend the next several years working on the PELS and the issues it is trying to address to find sensible solutions.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:22 AM
To: Comments
Subject: Comment Submitted

From: Trisha Geddes at purrble@gmail.com
Phone: 2084841282
Address: 1804 S. Hilton St.
City: Boise
State: Idaho
Zip Code: 83705

Comment:

Please do not deprive the people of Idaho of public lands held in trust for future generations. I understand that you're under a mandate to manage the financial interests of the state, but selling this land off would return a short term financial gain and a long term much larger loss for the people of our state. People visit (and sometimes move to) Idaho because it's still beautiful and wild, unlike so many places in the world.

They (and we!) value the beauty of McCall in large part because it's less developed and is open to all. If you chip away at that beauty and open space, you will do long term damage to tourism in the Payette Lake area and damage to the perception of our state as a place of unspoiled nature that people want to visit. That perception and the resulting tourism are worth sustained, long term profit. Sell off Idaho public lands now, and they're gone from our asset portfolio. Preserve them, and watch their value continue to grow and benefit the people of this state.

Thank you,
Trisha Geddes
Boise, ID

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:23 AM
To: Comments
Subject: Comment Submitted

From: Rebecca Bowling at jonbeckyb@gmail.com
Phone: 205-859-9566
Address: 710 Knights Rd
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Dear Governor Little and Idaho Land Board Members,

Thank you for considering comments on the proposed "land swap" proposed by Trident holdings and the future of our Idaho public lands.

As a third generation Idahoans, we have seen the growth in Idaho and how our landscape is changing. The public land in the McCall area is a precious resource that needs to be preserved. Please do not allow this valuable resource be sold or swapped. There are a multitude of options for the State of Idaho to generate revenue from these endowment lands. There is no price worth the exploitation of the land. These lands are not only significant to the residents of McCall and all of Idaho, but the many visitors to the area.

It is our hope that all stakeholders can work together with the land board to come up with a responsible solution to the future uses and revenues that will be beneficial to the state and it citizens.

Respectfully,

Jonathon and Rebecca Bowling

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:23 AM
To: Comments
Subject: Comment Submitted

From: John Ennis at ennis7@msn.com
Phone: (208) 290-6226
Address: 10620 lakeshore drive think
City: Sagle
State: Idaho
Zip Code: 83860

Comment:

Think about the future value of these properties and how the development of them will affect the surrounding properties. If a trade is made you must insure that the state gets the BEST of the deal by a big percentage not just some even-Steven deal which actually favors the developers

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:45 AM
To: Comments
Subject: Comment Submitted

From: Emily Reaves at emily_swogger@yahoo.com
Address: 2709 E Migratory Dr
City: Boise
State: Idaho
Zip Code: 83706

Comment:
Thank you for this opportunity to provide feedback!

I would like to ask that this process be slowed down to thoroughly understand the implications and to ensure that all stakeholders are involved. Once this beautiful land is gone, it is gone forever.

Please consider conservation easements on endowment lands. 'Conservation easements provide a market-based financial return, while maintaining traditional revenue sources like grazing and logging. Recreational leases can also be added to the asset portfolio, thus providing sustainable long-term returns.'

We have a responsibility to maintain open space, clean air, clean water and access to abundant public lands, waters and wildlife for future generations. Not to sell it off for a quick buck to wealthy out-of-staters.

Thank you for your consideration,
Emily

From: Sid Anderson
Sent: Monday, March 1, 2021 11:55 AM
To: Renee Jacobsen
Subject: FW: Payette Endowment Lands Strategy Plan submitted on December 15th
Attachments: PELS Plan Comment.pdf

From: Melissa Newell <meli.newell@gmail.com>
Sent: Monday, March 1, 2021 11:50 AM
To: Sid Anderson <asanderson@idl.idaho.gov>; Scott Corkill <scorkill@idl.idaho.gov>
Subject: Payette Endowment Lands Strategy Plan submitted on December 15th

Dear Land Board Members and IDL Staff:

Thank you for your work on the Payette Endowment Lands Strategy Plan and thank you for allowing me the opportunity to comment. I am a public school teacher in the state of Idaho and I fully appreciate your fiduciary duty. A comprehensive plan for the Payette Endowment Lands based on careful consideration of long-term effects for its beneficiaries, the ecosystem, and the watershed are intertwined.

My primary concern is Payette Lake and the watershed. I would like to see the PELS Plan include language that protects and maintains water quality. Please ensure that the Payette watershed and its surrounding ecosystem remains intact, as a buffer for the watershed, as a crucial wildlife corridor, as a refuge for plant and animal diversity, and as a source of stability and resilience against erratic weather, soil degradation, drought, tree disease, and fire. A robust and healthy ecosystem will ensure a healthy habitat for plant and animal species.

I am also very concerned about the limitations of the sewers system; the projections of the number of residences on its parcels and the worth of the parcels based on those projections are incongruent with the present sewer capacity of the sewer district. Please consider the City of McCall's comments on this issue.

There is no way to calculate the value of the lake and its surrounding ecosystem; its value is immeasurable. However, the lake and the surrounding state lands and wilderness are the economic drivers for not only McCall, but for the high revenues IDL hopes to get for its land sales for the beneficiaries; protecting this resource should be a priority. The lands immediately bordering the lake should be maintained in perpetuity, something the Land Board has the authority to do. They will only appreciate in value and they will also, by protecting the lake, protect the value of the rest of the endowment lands.

Finally, given the increasing value and scarcity of water and the fact that Idaho has now become a place of refuge, as more and more people move here, please consider a new asset management category: Watersheds. Classify the Watershed category like the timberland category, then it would not be available for sale. However, Municipalities or groups of citizens could purchase long-term leases or easements on this land to protect their water sources. The state of Idaho could purchase an easement on these lands to fulfill its obligation for preserving water quality or for protecting the public trust of Payette Lake. There could also be other stacked leases or activities on the land as long as they didn't interfere with the primary classification-watershed and the protection of it. Thus the fiduciary obligation of making money for the beneficiaries could be fulfilled as well as the need for communities to protect their drinking water and the health of their lake and watershed. This is a real win-win solution with long-term protection of land, water and beneficiaries at its core. I hope you will consider this addition to your asset management classifications.

Thank you,

Melissa Coriell
McCall, Idaho

From: Christine Jansen <Christine.Jansen.425847352@p2a.co>
Sent: Monday, March 1, 2021 12:12 PM
To: Comments
Subject: Retain Public Lands

Dear Governor Brad Little and Members of the Land Board,

The community of McCall and the Payette Lake region is incredibly important to me because ...

Idaho is endowed with rich public lands available to rich and poor alike. Let's keep it that way! I am concerned that selling or exchanging state land around Payette Lake may set a dangerous precedent that could result in the sale of thousands of acres of endowment land all across the state. Effectively closing it off to the public.

I urge the Idaho Department of Lands and the Land Board to work with partners to evaluate alternatives to land sales. IDL and the Land Board should also carefully consider their obligation under the Public Trust Doctrine to ensure that public benefits are maintained and protected.

Thank you for the opportunity to provide comment on this important issue and please keep me on the list for future opportunities.

Regards,
Christine Jansen
1710 N 11th St
Boise, ID 83702

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 12:18 PM
To: Comments
Subject: Comment Submitted

From: John Link at jlink792@gmail.com
Phone: 208 983-7260
Address: PO Box 449
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I appreciate the opportunity to comment on the Payette Endowment Lands Strategy (PELS). In making your decisions, I hope you will take into account several considerations other than just the short term economic gains. McCall's water supply could be deeply impacted by further development around Payette Lake. Selling off public lands to out of State investors is not in the best interest of Idaho citizens. These investors have little interest in the impact on water quality, public access to important wildlife and recreational areas, and the overall health of the area. The building of hotels, condominiums, and marinas will further damage the environment. Idaho citizens are counting on you to make decisions that will have long term benefits. Thank you.

John A Link DDS

From: Julie Manning <j4manning@yahoo.com>
Sent: Monday, March 1, 2021 12:22 PM
To: Renee Jacobsen
Subject: PELS comments

Hi Renee,

I hope you are well. I am attaching my comments below as a submission to IDL and would appreciate it very much if you could include them in the record. I attempted to submit them this morning through the IDL portal but I couldn't tell if it worked.

Thank you in advance.

Sincerely,
Julie Manning

Julie Manning
2000 N 21st St
Boise, ID. 83702
(208) 514-5266

Attention: Idaho Department of Lands
Re: Payette Endowment Lands Strategy
Date: March 1, 2021

It's imperative that we refrain from treating the distinctive lands around Payette Lake like they are fungible, easily interchangeable financial assets-- no different from parcels of land anywhere else in Idaho and easily bought and sold. They are not!

We must also stop pretending that it is practical to track them like financial assets, as if the values of the distinctive McCall endowment lands are like prices of company shares selling on the New York Stock Exchange. Appraisals and truly competitive auctions are the closest things we have to reliable market valuations of land. But unlike the stock market, these prices must be deliberately appraised and determined, appraisals are expensive to undertake, subjective, and infrequent. IDL admitted in the Focus Group discussion that the valuations contained in the PELS were outdated, inaccurate and should not be relied upon for lease and sale pricing.

Also, the Idaho Constitution does not mandate a parcel-based or acre-based review of endowment land revenues, and it's unreasonable for the state to do so. Moreover, a parcel-based focus on revenues could easily undermine or outright conflict with the Idaho Constitution's requirement of maximizing long term "returns". We need to do the deep thinking required to figure out the difference and the best way to satisfy the Constitutional mandate of long-term returns.

The law has always recognized that land is unique and accordingly has afforded a special remedy for parties engaging in land transactions when a proposed transaction is breached: it's called specific performance. And specific performance means a court will enforce the original land transaction contract because money

damages are not a sufficient remedy or substitute for land. **The distinctive lands around Payette Lake are the quintessential example of unique lands that cannot be substituted by other lands or money.**

If the Land Board and IDL are looking for ways to generate more revenues on endowment lands, how about building wind farms on rangeland and solar arrays on farmland? This would generate recurring, ongoing, long-term revenues and renewable energy at the same time.

As for the PELS, I have so many things I could say about it, but I will focus now on general principles. First, I appreciate and applaud IDL's efforts to focus on the McCall area and develop a plan to manage these distinctive lands. I also appreciate many of the concepts in the PELS, such as IDL's recognition of: (1) the important comprehensive planning work already completed by McCall and Valley County, (2) the need to be mindful of infrastructure issues including sewers, utilities, and roads, (3) the importance of working with stakeholders to address the state's financial needs and desires, and (4) making any changes to these lands over time and in stages. I also appreciate IDL sharing financial information with the public that gives us clues about how it views these lands.

My suggestions for the PELS are as follows:

(1) Exit the business of treating these distinctive, undeveloped lands as financial assets. And consider dropping assigned "asset classes" to the endowment lands. Why bother? Especially when lands are "transitioning" or useful for lots of different purposes. Alternatively, create a new asset class for the McCall area endowment lands (and other undeveloped, natural lands): classify them as "Distinctive Wildlands" (or something like that). Keep logging. Logging is an activity. It can be done in lots of places, including on Distinctive Wildlands.

(2) Come up with new activities to generate revenues, especially sensible recreation, which is perfectly suited to these lands and can and is taking place currently on the same lands where IDL is engaged in logging and other revenue-generating activities. Consider user fees and park passes for ziplines, camping, hunting etc. If you must.

(3) Choose to protect these lands! Article IX, section 8 of the Idaho Constitution requires the Land Board to provide for the "location, **protection**, sale or rental ... of all the lands ... granted to or acquired by the state". Choose "protection"! Adopt policies, regulations, and statutes recognizing that certain endowment lands are most valuable as undeveloped Distinctive Wildlands and hold them to produce the "maximum long term financial return" for the beneficiaries. The Land Board and IDL should also respect the legislature's intent since 1925 recognizing Big Payette Lake as "a health resort and recreation place" and exercise their discretion on the adjacent endowment lands consistently with this section 67-4302 of Idaho Code.

Then, go generate revenues on endowment lands that are not "Distinctive Wildlands", which could include the Deinhard 20 (or even 80).

(4) Add a recognition of climate change to the PELS. If this factor is not obvious today (arguably it is), it will be very soon. IDL must continue to manage these McCall endowment lands and the watershed because this stewardship will provide Idaho protection from floods, fires, droughts, and other catastrophes that we may not even imagine today. Just ask Texas. And these efforts, this stewardship, will be worth billions of dollars.

(5) After IDL revises its plan, it should be an enforceable, binding plan, and IDL should use it as a framework for evaluating opportunities on endowment lands.

How to accomplish all of this? IDL is already off to an excellent start with the moratorium, the PELS, and the recently-convened Focus Group, which demonstrated that stakeholders are smart, creative, and willing and able to collaborate in good faith with the IDL. Now, IDL or the Land Board should establish a longer term advisory committee to spend the next several years working on the PELS and the issues it is trying to address to find sensible solutions.

From: Scott Corkill
Sent: Monday, March 1, 2021 12:28 PM
To: Comments
Subject: FW: comment

-----Original Message-----

From: Rick Fereday <aviator81t@gmail.com>
Sent: Monday, March 1, 2021 12:27 PM
To: Scott Corkill <scorkill@idl.idaho.gov>
Cc: Diane Green <DGreen@idl.idaho.gov>
Subject: comment

Scott,

Tried to submit this to the comments page but no luck. Please forward to the proper person.

Thanks

Rick Fereday

Writing to support the plans that are or will be submitted by various groups formed recently in the McCall area. Many valuable and workable ideas have been proposed.

The big picture is that we in Central Idaho support the way that IDL has managed endowment lands up to this point but with the changing demographics of Idaho it is time to protect these open spaces while still keeping the Endowment whole. The worst possible scenario is to sell these properties to developers. That would be a tragedy for McCall and Idaho in general.

I especially like the Conservation Easement idea so please investigate that valuable tool.

Rick Fereday
McCall

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 12:30 PM
To: Comments
Subject: Comment Submitted

From: John Powell at
City: Cascade
State: Idaho

Comment:

I vehemently oppose sales of Idaho's public endowment lands to anyone (private corporations or individuals). These lands are owned by the citizens of Idaho and should remain so. Public lands are used by Idaho's residents for recreation of all kinds. They provide scenic value, environmental value, peace-of-mind, etc.

Public lands are public lands. Once they are sold, they are no longer public.

Selling the lands can not maximize the long-term potential because we, the citizens of Idaho, no longer own them and they will cease to bring in income. Selling the land is a one-time sale with a finite income.

Idaho's forests have an incalculable value to the public and to the environment. The value of public access to these lands is also incalculable. You can't place a number on the long-term value of our forests to the local residents and visitors.

Development ultimately destroys public land.

Public loses access.

Once it is gone, it is gone. Idaho will never have these lands back.

The residential development is not necessary or helpful. These homes will be sold to the highest bidder as vacation rentals and 2nd, 3rd, or 4th homes for the wealthy. We do not NEED more development. It is a shameful cash grab by the State.

We know you can do whatever you want with the land as long as it is in line with your guiding documents. But, please listen to the public. Valley County does not want these land sales.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 12:38 PM
To: Comments
Subject: Comment Submitted

From: Karen Harvey at karen@forestpropertymanagement.com
Phone: 2083152606
Address: PO Box 2472
City: McCall
State: Idaho
Zip Code: 83638

Comment:
STRONGLY oppose the sale or transfer of public land! Keep McCall cool- no one wants another Tahoe or Sun Valley.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 12:42 PM
To: Comments
Subject: Comment Submitted

From: Michael Cooper at
Phone: 208-325-4088
Address: P O Box 268
City: Donnelly
State: Idaho
Zip Code: 83625

Comment:

I oppose the land swap of our beautiful lakes (Big Payette, Little Payette) right out our doorsteps, for a bunch of over cut, over roaded, clearcuts up in the Idaho panhandle, of lesser value on top of it. Haven't we learned from Manchester and the Wilkes Brothers what happens when we sell out and lose our way of life piece by piece. For what, corporate profit? For someone that's already rich? If you want to hike, bike, hunt, fish, cut wood, pick huckleberries, etc... how much is it worth in dollars? It's PRICELESS and once sold and resold it's gone. I hope our state land board officials perceive this land swap for what it really is, which is a taxpayer and public loss of quality of life and a financial loss for our community in the long term.

Michael Cooper

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 12:45 PM
To: Comments
Subject: Comment Submitted

From: Mike Thomas at mthomas3705@gmail.com
Phone: 2083011953
Address: 412 McGinnis St
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I am concerned that increased development will negatively impact water quality in Payette Lake and Cascade Reservoir. This draft plan does not adequately address the ever-increasing value of recreational-use land in Idaho. I believe there is room for revenue in forms not evaluated in this draft plan, such as fees for recreating on endowment lands (e.g., \$10 annual pass, etc). Many tourists visit McCall not just to eat at restaurants or ski, but to pick huckleberries, ride mountain bikes, and hike or camp in the immediate area. I do not support any form of land swap for north Idaho timberland. I do not support commercial or residential development on these endowment lands. I do not think any land swap or development will be beneficial in the long-term to Idahoans. Do not be short-sighted in your decision.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 12:56 PM
To: Comments
Subject: Comment Submitted

From: Alexis Martin at atmartin2013@gmail.com
Phone: 2083157631
Address: 265 Alta Vista Dr, PO Box 391
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Re: Payette Endowment Land Strategy Draft

Dear Idaho Land Board,

Thank you for recognizing the importance of creating a stakeholder's group to be a part of the plan for the future of Idaho Endowment Lands. I am really impressed with the diverse members of the PELS Focus Group and am grateful to see local citizens, organizations, businesses, city, and county governments represented. The focus group is a critical component for developing the best plan possible. Local stake holders that are most effected by the PELS plan provide excellent insight, innovative ideas and knowledge that will help IDL and the Idaho Land Board develop the best plan possible.

My comments regarding the current plan include:

- Keep the focus group engaged with the entire process until a final plan is completed. Include the entire focus group in the development of the plan. Consider transitioning the focus group to a long-term advisory board to help guide future decisions. Successful complex solutions require creativity and input from a diversity of viewpoints which the focus group provides.
- Consider the addition of new asset classifications for endowment lands: Do the current five asset categories still work for today and the future? The addition of new asset classes would expand options for revenue for the endowment lands. Consideration should be given to include recreation and conservation easement asset classes along with the currently defined assets classes such as timber, mining, grazing, etc. By giving conservation and recreation their own asset classes these potential revenue sources would be clearly defined along with the other currently defined asset classes. Recreation should be a separate class from the commercial asset class as the word commercial lends a different meaning than recreation. Recreation and conservation easements/leases can be strong revenue sources and could be the greatest source of revenue for a particular parcel when compared to other asset classes or the outright sale of a parcel. The plan should clearly state that the land board supports all possible revenue sources for the endowment lands, including recreation, conservations easements, and other possible new revenue sources. Protocols for conservation easements at market value should be examined and developed.
- Allocate an appropriate amount of time for developing a comprehensive plan. Time is needed to examine recreation and conservation as revenue sources for the endowment lands. The Idaho Land Board should allow more time for focus group members to develop new viable revenue options for the endowment lands. Work with focus group members to establish an appropriate timeline for completion of the PELS plan. It is important to provide the time necessary to develop a strong comprehensive plan. This plan will likely be the model for over 2 million acres. As such, it is critical that an in depth, thorough and thoughtful analysis is completed.
- A moratorium on any actions should stay in place until the plan is finalized. Keep the moratorium in place until all focus group members are ready to move forward, and a final plan is in place.
- Any analysis regarding the decisions on each endowment land parcel should include the mitigation costs of protecting McCall's drinking water source, Big Payette Lake.

- To ensure a clear description of how endowment lands are currently being use, the plan should document all current uses on endowment lands such as public recreation like snowmobiling, hiking, mountain biking, foraging, and hunting. Access for the community to other public lands such as Forest Service through endowment lands should be documented as well. Access easements should be considered for any sold parcels.
- The Land Board should be aware that IDL did not allow the focus group to comment on specific parcels.

Thank you to IDL and the Land Board for the work completed thus far on the draft plan. It is my hope that IDL and the Land Board will commit to the hard, challenging work and length of time that is needed to build on this work and create a strong, comprehensive plan. Though this may seem daunting in the short term, the value of putting in the effort now will pay large benefits in the future for all of Idaho's endowment lands.

Thank you for considering my comments.

Respectfully,

Alexis Martin
McCall, ID

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 1:05 PM
To: Comments
Subject: Comment Submitted

From: Chris Runyan at chris.runyan01@gmail.com
Phone: 14065708100
Address: 606 Brookdale Drive
City: Boise
State: Idaho
Zip Code: Idaho

Comment:
Hello Idaho Land Board,

I ask the board to develop a Conservation Easement Option when determining how to manage state lands and that you extend the moratorium to allow sufficient time to develop this option. When land is purchased at fair market value and put into a conservation easement this will generate revenue for the endowment through encouraging recreation uses and wildlife opportunities that bring money and people into these neighboring communities. The value of recreation is increasing exponentially in the Western states and should be factored into the decision process when determining what is the best use of land. The state should complete a study to determine the economic impacts from recreation on other nearby states including: Oregon, Washington, Montana, Wyoming, Utah, Colorado etc.. A properly developed model (this will have to be completed at some point) for McCall will benefit other communities across the State as well, to accurately monetize the impact recreational opportunities have on surrounding towns and the State of Idaho. Lastly, conservation easements can also be written to allow for traditional uses, such as timber and grazing, thus keeping the land in the Endowment portfolio and allowing for continued revenue.

Sincerely,
Chris Runyan (4th Generation Idahoan)

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 1:10 PM
To: Comments
Subject: Comment Submitted

From: Julie Manning at j4manning@yahoo.com
Phone: 208-514-5266
Address: 2000 N 21ST ST
City: Boise
State: Idaho
Zip Code: 83702

Comment:

Here is a general comment about the endowment lands, and specifically the recent application by Trident.

Trident Holdings, a new company run by a recent and inexperienced MBA grad, submitted an application to IDL that is at once lengthy and lacking in details, seeking to acquire approximately 21,241 acres in McCall, including all 5,478 covered by the PELS. Trident proposes to swap about 20,547 acres of timberland located throughout four northern Idaho counties allegedly worth around \$39 million— not money— in exchange for the McCall lands.

There is lots wrong with Trident's proposal . For one, this is obviously a ridiculous, lowball offer when a single house on Payette Lake can sell for \$3-5 million. For another, it doesn't mesh with IDL's activities in the area or the PELS, and the community has strongly opposed it. Trident seems to think it can: concoct a mysterious and complex scheme, submit a vague application and hire a bunch of professionals to "explain" what a great deal this is for Idaho, and threaten a lawsuit (see its Land Board presentation at the November, 2020 meeting), that IDL and the Land Board will have to give in to its demands.

This is lame, and so is something else. Every dollar IDL spends on due diligence costs the beneficiaries and reduces the dollars available to our public schools. Just because Trident paid \$1,000 to submit its application, how much should IDL have to spend on due diligence for this lowball proposal? In this case, not much because it is clear that Trident is seeking to acquire state lands for pennies on the dollar, and this deal would clearly violate the Land Board's constitutional mandate to maximize long term returns to the beneficiaries.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 1:15 PM
To: Comments
Subject: Comment Submitted

From: Kara Utter at utter.kara@yahoo.com
Phone: 2083154429
Address: PO Box 1710
City: McCall
State: Idaho
Zip Code: 83638

Comment:
RE: Comments on IDL Draft Payette Endowment Land Strategy
March 1, 2021

State Board of Land Commissioners,

Please consider conservation easements as a path forward. They would allow for timber and grazing to continue while still providing opportunity to expand on other revenue-generating activities such as recreation and hunting. They are also flexible in allowing for the possibility of building envelopes, which could be incorporated in the planning for facilities to help manage these activities.

Travel and Tourism is Idaho's third largest industry, with FY2019 reaching the highest revenue generated on record. Idaho tourism continues to grow with much emphasis being placed on the Idaho Recreation and Tourism Initiative. I would request that the moratorium be extended to allow for IDL to thoroughly research and provide case studies into these options to generate revenue needed to meet fiduciary duties.

The more crowded cities become, the more desperate those living in cities seek out adventures in rural areas like Valley County. To figure out how to generate revenue by providing recreation and hunting in perpetuity on these lands would mean that destinations like ours will always be in-demand for providing rejuvenation and adventure.

Sincerely,
Kara Utter
PO Box 1710
McCall, ID 83638
utter.kara@yahoo.com

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 1:18 PM
To: Comments
Subject: Comment Submitted

From: Jennifer Hurlbutt at jenn@salmonriverbrewery.com
Phone: 2083150689
Address: PO Box 148
City: McCall
State: Idaho
Zip Code: 83638

Comment:

We oppose the sale or transfer of public land. We have lived in McCall for 18 years. We urge the Idaho Department of Lands to take a conservation-minded approach when assessing larger, ecologically and economically vital endowment land parcels. In the long-term, these lands can generate additional sources of revenue for the state while still allowing active management.

Thank you.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 1:45 PM
To: Comments
Subject: Comment Submitted

From: Dawn Matus at dsmatus@yahoo.com
Address: PO Box 1841
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Re: Payette Endowment Land Strategy

I am writing to express concern about the future of the Payette Endowment Lands and to urge the Land Board and IDL to take a holistic, long-term perspective with regard to their fate. I appreciate the Land Board and IDL's request for creative solutions to management of the PEL, and I support the Payette Land Trust's recommendations on the matter, as follows:

- 1) Please extend the moratorium on land sales or land exchanges to allow for the time to develop protocol for the PEL.
- 2) Please pursue the development of a "Conservation Easement Option" for the PEL.
- 3) Please recognize that Conservation Easements are a way to generate revenue for the Endowment, as they are purchased at fair market value.
- 4) Please consider that a properly developed model for McCall and the PEL will benefit other communities across the State.
- 5) Please keep in mind that Conservation Easements can be written to allow for traditional uses, such as timber and grazing. Keeping the land in the Endowment portfolio would allow for continued revenue from these uses.

Finally, please consider the invaluable place these lands have in the lives of millions of people in McCall, greater Idaho, and beyond, as well as their importance as habitat and migration lands for multiple species of wildlife. Preserving the lands in their natural state, preserving public access to the lands, and protecting them from development are in the interest Idahoans and Idaho.

Thank you for your consideration and thoughtful deliberation on this issue.

Sincerely,

Dawn Matus

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 1:47 PM
To: Comments
Subject: Comment Submitted

From: Heidi Winchel at mountainchica65@yahoo.com
Phone: 208-630-4984
Address: PO Box 815
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I will try to keep this as short and sweet as possible but that may be hard as I have pretty deep feelings about the potential development of some of the endowment parcels.

But let me start off by saying I am adamantly opposed to selling off any of the parcels that touch on the shoreline of Payette Lake. We all know this lake is the gem of the area and the reason so many people visit our area. It is getting more and more crowded here and once it is developed we will never get it back. Demand for access to the lake is getting higher and higher every year....the available areas are already packed in the summer so this undeveloped shoreline is what allows us to spread out and enjoy this most important of community assets. If parcels I,H,J and L are traded or sold off this will likely be for the sole purpose of developing the lakefront or lakeview property and taking that away from the public. I know the discussion involves setting aside an even larger area for conservation and recreation but lets just call it for what it is...this is solely for the value of the future real estate that is to be created on Payette Lake.

I am a realtor here but I am first and foremost a citizen of this valley and I would hate to see our lakefront developed into even more parcels for the uber rich and the access taken away from the rest of us who live and recreate here. This is a land grab designed to monetize these lands and the money goes into the hands of the developers only.

It's already crowded enough in our little corner of Idaho but with all the new people discovering our area it is only going to get more and more crowded and the few campgrounds and beaches that are currently available will only get more and more wear and tear and abuse as these folks go out looking for the adventure and recreation they are coming here for. Not to mention those of us who live here and already avoid going to the lake on weekends in the heart of summer because it is so crowded.

And of course there's our "local's" beach in parcel G that was almost lost once and now could be lost again. It has already been discovered and isn't the little secret beach that it used to be but it gives us a place to go that isn't usually quite so overrun.

Developers are always about the money and selling the "quality of life" in places like our home....and don't get me wrong , I don't have a problem with development in general....but to trade away the assets of our quality of life and the recreational resources that are the main reasons people come here in the first place to someone who wants to monetize those things is incredibly disheartening and I hope something that is not being seriously considered.

The lake and access to it are the two most valuable resources we have and they should be protected and kept for ALL users in perpetuity.

Looking into the future it seems likely that this area is only going to keep growing and growing as more people move to the state and discover this area. I've already lived in similar areas in Oregon and Colorado and watched as areas grow and resources get overwhelmed....it's only by looking out for the long term future and preparing for that growth by setting aside our resources and assets now that our area will be able to grow in a controlled manner with it's resources already protected and set aside for future generations. This shouldn't be about creating some more lakefront lots to sell to the benefit of a few....this should be about protecting that lakefront for everyone and preparing for the growth and demand to recreate it on it that is surely on the horizon.

We should have a say in what our home looks like...and we don't want it to look like a city on the lake or become so

overcrowded that the quality of the lake is destroyed....being able to spread out users and create new recreational accesses should be more important than a corporation's financial needs. We have one chance to do this right and keep the shores and forests around Payette Lake open to all users. There are three potential uses listed for these parcels....recreation, conservation and residential....lets choose two out of three. Our valley has more than enough room to accommodate the growth that is coming but my two cents says it shouldn't be in a recreational asset whose value is priceless to those who live and recreate here.

There are more suitable parcels being considered for residential development and I know the people that have homes bordering those parcels will not be happy to see them developed but I think it is a reasonable expectation that someday there will be homes in those areas. They are already residential neighborhoods and they are in town. Whenever I have a buyer interested in those neighborhoods I am always clear to them not to expect those areas to stay vacant forever....those are suitable areas for development and don't take away recreational lands. That said....I would love to see those stay open as well, just for wildlife and to keep open spaces open (I live in the Woodlands and have gone walking on those lands) but I understand that the area around Deinhard and Pilgrim Cove are eventually going to be developed.

That's my two cents....I really hope the State can see the value of protecting the shoreline of Payette Lake and the recreational land with it's wildlife and existing trail systems intact and access protected for this generation and the generations to come. There's likely only once chance to do this and do this right and the time is now.

Thank you – Heidi Winchel

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 1:49 PM
To: Comments
Subject: Comment Submitted

From: Michelle Webb at michellewebb@cableone.net
Phone: 208-571-9860
Address: 2301 N. 30th St.
City: Boise
State: Idaho
Zip Code: 83703

Comment:

Hello – I am writing as a multi-user of ID public lands (mountain biking, off-road riding, trials, hiking) and wanted to get my comments heard. I think everyone at IDL is in support of keeping these lands public and not sold to an out of state developer. Regardless of what their stated intentions, they will develop the land. The area will become another Tahoe, over-developed and super crowded! Keep Idaho in Idaho hands.

From: Tammy Armstrong
Sent: Monday, March 1, 2021 2:17 PM
To: David Simmonds
Cc: Renee Jacobsen; Kellie LaBonte
Subject: FW: PELS comment letter from BPLWQC
Attachments: BPLWQC Comments on Payette Endowment Land Strategy 20210301.pdf

Good afternoon Mr. Simmonds:

Thank you for submitting your comments. I am forwarding your attachment to Renee Jacobsen and Kelli LaBonte as they are the individuals that are overseeing the comments through our on-line process.

Regards,

Tammy Armstrong

Tamara L. Armstrong
Real Estate Program Specialist

Idaho Department of Lands
300 N 6th Street, Suite 103
Boise, ID 83702
208-334-0215

From: David Simmonds <info@bigpayettelake.org>
Sent: Monday, March 1, 2021 1:50 PM
To: Tammy Armstrong <tarmstrong@idl.idaho.gov>
Subject: PELS comment letter from BPLWQC

Tammy,

Please find attached a comment letter from the board of the BPLWQC on the Payette Endowment Land Strategy, for the Land Board record. Thank you.

Dave

David Simmonds, President
Big Payette Lake Water Quality Council, Inc.
PO Box 3108
McCall, ID 83638

On Wed, Feb 17, 2021 at 8:58 AM Tammy Armstrong <tarmstrong@idl.idaho.gov> wrote:

Good afternoon Focus Group members:

Please find attached the Agenda for the next Zoom webinar to be held on Thursday, February 25, 2021, 1:00-4:00 PM [MST].

Our Webmaster is currently working on uploading the presentation materials as well as the recorded webinar at <https://www.idl.idaho.gov/payette-endowment-land/>. You will find the information under **Materials – February 11, 2021**.

Please use the Panelist Webinar invitation that was sent to you separately for the webinar on February 25, 2021. While you have already received an Outlook calendar notice from me for the meeting to block the time on your calendars, you can also upload and save the information from the e-mail to your calendar. You will also receive a notice one day prior and one hour prior to the webinar as reminders of the event. If you are unable to attend any of the webinars or need assistance, please feel free to send an e-mail to my attention at tarmstrong@idl.idaho.gov.

We look forward to seeing you at the webinar.

Regards,

Tammy Armstrong

Tamara L. Armstrong

Real Estate Program Specialist

Idaho Department of Lands

300 N 6th Street, Suite 103

Boise, ID 83702



Big Payette Lake Water Quality Council, Inc.
P.O. Box 3108
McCall, ID 83638

March 1, 2021

Idaho State Board of Land Commissioners
Idaho Department of Lands
300 N. 6th Street, Suite 103
Boise, ID 83702

Submitted via Email to tarmstrong@idl.idaho.gov

Comments on the Payette Endowment Lands Strategy

Members of the Land Board and Staff,

Please accept our commentary and testimony on the Payette Endowment Lands Strategy, on the focus group recently convened to review that process, and on the broad context of both those efforts. We thank you, and appreciate the gravity with which the Idaho Department of Lands and Idaho Land Board have approached this challenge.

General Comments

The draft Payette Endowment Lands Strategy (December 2020) is a commendable start on a more transparent planning process where subject lands intersect with intense public concerns, vital public interests, and an inseparable public trust mandate with regard to Payette Lake. However, the basic concept and scope should and must be broadened considerably to be sufficiently useful and meaningful for comprehensive decision making that may help the Land Board avoid - to the extent that it's possible - public backlash when deciding the fate of such high-profile lands.

The endowment mandate at issue with these lands is circumscribed by additional and related provisions of Idaho law and public trust mandates. The PELS overlooks these in its recommendations and conclusions. Clear-eyed decision making requires a fuller context, on which we'll elaborate.

It's sensible and helpful to consider the City of McCall area of impact scope for lands which the PELS identifies as tier 1 and 2 transition lands. But that's also like looking at an elephant through a keyhole. In reality, the Land Board is faced with a massive land exchange proposal which extends far beyond the scope of the PELS. As well, limiting the PELS to the city's area of impact leaves out most of the lands which make up the immediate Payette Lake watershed and its associated subwatersheds that similarly impact the lake and the community.

We encourage the Department and the Land Board to use the draft PELS structure and focus as a template for additional planning and analysis that gets the State and the public better aligned with the realities that are before us. Yes, there may be some PELS tier 1 or 2 parcels that are ripe for decisions to provide near-term returns, but the opposite is true for other tier 1 and 2 parcels. It has also been noted

by many participants in the focus group that more work is needed on modernizing primary Asset Classes and easements, particularly conservation easements where those are most applicable. We agree, and hope the Land Board will be cautious, judicious and incremental in moving forward at this time, and also take the PELS process to the next level in terms of informing a path forward.

Specific Comments

Payette Lake

Payette Lake and endowment lands within its watershed are joined at the hip. The implementation of a plan such as the PELS for these lands will certainly influence the water quality, sustainability and character of Payette Lake. But the lake and the lands are two separate issues, with their own legal mandates and constraints. Why then should the lake be a driving factor for IDL and the Land Board, in the context of a strategy for endowment lands?

Beyond the intense concern of citizens, we suggest that *constraints*, *compromise* and *success* might be the short answers to the question, on which we'll elaborate.

I. Constraints

The plan, IDL and the Land Board should recognize that a fiduciary trust mandate for the school endowment is not entirely unconstrained, but that Idaho's laws provide helpful and powerful guidance. On the one hand, we recognize that IC 58-1203(2) provides that, "the public trust doctrine shall not apply to... The management or disposition of lands held for the benefit of the endowed institutions as set forth in article IX". Simple enough, except IC 58-12 goes on, at 1203(4), to state, "Nothing in this chapter shall be construed as repealing, limiting, or otherwise altering" statutory or constitutional provisions specifically including IC 67-43 for Payette Lake. So, the exclusion from public trust of the endowment lands is not absolute, but is counterbalanced by the specific Payette Lake public trust mandate in IC 67-43. That direction to preserve Payette Lake goes well beyond water storage, and establishes beneficial uses including "scenic beauty, health and recreation".

Further, in IC 39-66, the Big Payette Lake Water Quality Act, the legislature found that "...the waters of Big Payette Lake and its watershed are threatened with deterioration due to expanding residential development, greater public use and growing land use activities...", and that, "the state holds all such public lakes in trust for the use of all its citizens; that to preserve and protect such public lakes and to increase and enhance the use and enjoyment of such lakes is in the best interest of all the citizens of the state; that natural lakes form an important basis of the state's economy and that the increasing demand upon the lake waters of this state require coordinated state and local action to protect, preserve and improve the water [quality] of the lakes."

II. Compromise

The IDL focus group sessions could, and should, have been an opportunity for the participants to identify and work through specific places and instances where restraint and compromise in analysis and planning would be necessary to balance the conflicting requirements of law, fiduciary responsibility and public trust. However, from the outset, that subject was identified as off-limits by IDL. Several attempts to add such issues to the discussion were cut off by the facilitator or staff. That prohibition was a missed opportunity to address critical issues which we are certain cannot be set aside or ignored. Consequently, we request that IDL and the Land Board allocate additional time and space for the

Department and stakeholders to identify paths forward that may work to resolve apparent mandate conflicts through consensus and compromise. We believe this is both possible and desirable.

Cases in point would be illustrated by viewing Cougar and Shellworth islands through the lens of IC 67-4301 and 4302. No sensible analysis of these iconic tiny, rocky, scenic islands could conclude that they are irrelevant, or inconsequential, in the preservation of Payette Lake's scenic beauty, health and recreation. Yet the PELS places them in tier 1 and 2 transition, while merely noting that there is a "drainfield for existing leased lot", which illustrates in part what's wrong with the current approach. It might be helpful and realistic instead to view the islands as both endowment trust and public trust lands simultaneously. There is currently no appropriate asset class or transition rationale that fits these situations. A conflict in law exists, which requires something beyond the PELS to resolve. The islands also provide a bit of a common-sense test in terms of whether small rocky outcrops with no appropriate infrastructure, in a lake which is a municipal drinking water supply, can be rationally understood as residential development candidates. What would a reasonable person conclude? What would a fair interpretation of the Payette Lake public trust in IC 67-43 lead us to conclude?

Similarly, a planned transition from timberland to residential of the parcel identified in the PELS as "Grove" or parcel G, sets up a conflict between endowment returns and the trust mandate in IC 67-4301 and 4302 specifically with regard to preservation of Payette Lake's beneficial uses and devotion of State lands between the high and low water marks to a public use in connection with the preservation of the lake. We hope that the Land Board will pause and take a deeper look into what course of action would satisfy the State's various legal obligations and trust mandates in a balanced and acceptable manner.

III. Success

The endowment lands mandate and the Payette Lake mandate must somehow coexist as responsibilities of the State. Endowment land decisions may either uphold or fail to uphold the Payette Lake public trust. Other constraints, such as protecting a public drinking water source, or addressing water quality beneficial use non-attainment, should or must inform the State's planning and decision process, even if the result would temper a theoretical maximum return to the endowment. In other words, a proper compromise. The State must balance these competing public policies and trust responsibilities in making successful endowment land decisions.

As this planning effort continues, there will certainly be moments when decision makers will find it necessary to stop and consider context, effects, and consequences that feed back into governance. A careful consideration of the future of Payette Lake provides one of those opportunities to stop and reflect, and incorporate reasonable constraints and compromises into judgments and assumptions about long term returns. The problem before us is not a zero-sum game. What makes it both complex and interesting is that it's a positive-sum game if played thoughtfully and well. This should be a moment in history where there can be general agreement on what would constitute success.

Conclusions

The PELS is a good start, and the focus group is a new departure. Both are worthy of much more investment of effort in a measured and thoughtful way. We can't ignore that some very large shoes may be about to drop on these endowment lands, while the focus of the PELS remains on a small percentage of lands in the City's impact area.

IDL may have been asked to go down an unusual and uncomfortable path by engaging in a public process for endowment lands, and we appreciate the professionalism and seriousness with which the Department and staff have approached the task. While some of our board members have been engaged in endowment lands issues for 40 years or so and have a fair understanding, the general public may have a steep learning curve with the nature of these lands and the constitutional mandate. IDL staff have been thorough and patient in their explanations. We're glad we were asked to be part of the focus group, and we want to help the State's planning process be an exemplary success by showing that the endowment mandate and the public trust can, in fact, coexist through skillful and wise governance.

The primary reason that we are engaged is our respect for and dependence on Payette Lake. Protecting and sustaining the lake is our mission. The lake is our drinking water source, our culture and our economy, and we believe it's also a multiplier for the corpus of the school endowment lands. It is in everyone's interest to predicate each decision point upon how it will - or won't - protect Payette Lake.

Sincerely,



David Simmonds
Big Payette Water Quality Council, Inc.
Web: www.bigpayettelake.org
Email: info@bigpayettelake.org

Board of Directors:

David Simmonds, President
Tom Tidwell, Vice President
Laura Shealy, Treasurer
Deb Fereday, Secretary
Rich Holm, Government Liaison
Paul Street
Gary Lyons
Susan Bechdel
Scott Harris

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 1:55 PM
To: Comments
Subject: Comment Submitted

From: Johanna Stangland at
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Please protect the natural ecological (including water quality) and recreational resources and the aesthetic value of Payette Endowment Lands for future generations.

I am an open water swimmer, and I most enjoy swimming along the northeast end of the lake and around islands including Shellworth Island.

I am concerned about a land exchange, transfer or sale, especially that proposed by Trident, and I ask that you please keep this land public.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 2:01 PM
To: Comments
Subject: Comment Submitted

From: David Simmonds at dsimmonds50@gmail.com
Phone: 2086346929
Address: PO BOX 287
City: McCall
State: Idaho
Zip Code: 83638-0287

Comment:

As a long-time resident and homeowner in the City of McCall, I rely completely on Payette Lake for my drinking water supply. Its condition and value also directly affect the value of my property and my quality of life. The PELS is a commendable start, but does not adequately consider the protection and sustainability of Payette Lake in its scope and conclusions. Please continue and expand upon planning and public involvement for the Payette Lake lands so that decisions are made within the scope of Idaho's laws and trust mandates which constrain the trust mandate in article IX. First and foremost, protect Payette Lake. Thank you.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 2:06 PM
To: Comments
Subject: Comment Submitted

From: Shannon Campbell at scampbell462@gmail.com
Phone: 2083150054
Address: 3307 N. 28th Street
City: Boise
State: Idaho
Zip Code: 83703

Comment:

As a long-time resident of McCall who now lives in Boise, please do not allow this "land trade" to go through. Public access to our lake and lands cannot be sold out to a private equity firm that has no interest in people's quality of life here in Idaho. Please protect our public access- further development of McCall will detract from its beauty and charm. This land grab does nothing positive for the people of Idaho- as an active voter in this state, I vehemently oppose this.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 2:23 PM
To: Comments
Subject: Comment Submitted

From: Bruce Smith at bms2650@gmail.com
Phone: 2088050133
Address: 2809 s shadywood way
City: Boise
State: Idaho
Zip Code: 83716

Comment:

For those who submitted comments, please note the previously filed applications by PC Partners LLC for parcel G and Shellworth proposed low impact glamping using yurts combined with a conservation easement component similar to many of the comments submitted. Thank you. PC Partners

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 2:30 PM
To: Comments
Subject: Comment Submitted

From: Jeffrey Canfield at seafield@ctcweb.net
Phone: 2087414311
Address: 1102 Buckboard Way
City: McCall
State: Idaho
Zip Code: 83638

Comment:
To: Idaho Department of Lands
Subject: Comment on the Payette Endowment Lands Strategy (PELS)
From: Jeff Canfield
Date: February 28, 2021

I am a year-round resident of McCall and a retired forester. I am commenting on the Payette Endowment Lands Strategy (PELS). I hope my comments will be useful in the planning process.

In this moment the public is united and speaking in one strong voice. We are galvanized in support of maintaining access to and protection of the endowment lands for the health of the ecosystem, the benefit of our community, and for the health of the lake and watershed. We are firmly against swapping or selling them off wholesale or parcel by parcel. The PELS and the Focus Group are steps in the right direction, but this moment demands greater action. We need a long-term advisory committee that can study and identify the issues and propose policy changes and reform that will align the needs of the stakeholders and provide solutions.

A plan for the McCall area endowment lands should:

- Create a stakeholder advisory committee. Given the importance of the McCall area endowment lands and the fact that it will serve as a precedent for the rest of the state, the Governor or the Land Board should form a stakeholder group to study this area and report on how to address issues and needs, including policy changes and other reforms.
- This will take time. The planning period should be extended to allow time to develop a comprehensive plan.
- A comprehensive plan should preserve the continuity and contiguousness of the state-owned lands and federal lands, which facilitates access for IDL's management, human recreation, and wildlife.
- Protect the public trust. State elected officials have a duty to protect navigable waters, including Payette Lake; and this should be fulfilled consistently with fulfilling their endowment trust duties.
- Prohibit a wholesale land swap. A large-scale swap and/or disposition of lands would lead to more development than these lands and the infrastructure can handle; also the state currently holds an effective monopoly on lands around the lake, which is too much power to transfer to a private entity.
- Implement land conservation solutions. The state should develop new sources of revenue if needed to fill gaps through conservation and recreation solutions such as leases, easements, license/user fees, and other solutions that honor the health of the lands, waters, and ecosystem.
- Balance costs and revenues. Any proposed transactions or major management decisions involving endowment lands should calculate and consider short and long-term costs of such activities, and balance those against anticipated benefits and revenues.
- Align the Idaho Constitution and stewardship. The Land Board and IDL should exercise their discretion to the full extent of the Land Board's Constitutional authority so that management of endowment lands aligns with the realities

and needs of the 21st century.

- Not exacerbate economic divisions by selling off desirable endowment lands to the highest bidders. The state should ensure that the public retains access to current lands held by the endowment trusts and should not exacerbate the economic divisions in our community and society by facilitating the privatization of our treasured outdoor lands.

What is not in the plan:

- A substantial acknowledgement and acceptance of the VALUE of healthy ecological processes. The lands bordering the Lake are the most valuable for revenue generation, for appreciating in value in the future and fundamentally for buffering and protecting the lake from degradation. The Land Board has the discretion to set aside and maintain these lands in perpetuity. Since they will continue to grow in value more than any other lands they will provide the best inflation protection and diversification of the portfolio. And as they protect the lake from further degradation and insure its health they would be protecting related resources from adverse impacts. All the while, they would be increasing the value of the whole Payette Land Trust by guarding the health of the waters which drives the possible revenue generation from all those lands. So setting aside the endowment lands around the lake to be maintained in perpetuity would be the win-win that we all are seeking.
- Consideration for expanding Ponderosa State Park to protect these lands. The public has made clear time and time again that they would like to see Ponderosa Park expanded. And indeed, the Park is struggling with overwhelming demand for its services. The Parks department has indicated their willingness to consider these endowment lands as possible candidates for expansion. The plan has proposed no path forward to explore these possibilities. The same is true of the Payette National Forest. They are concerned with loss of access to their lands, with loss of recreational opportunities because of short-sighted planning and lack of an overall coordinated vision, and with the huge issue of Fire. But again, the plan contains no avenue for sustained and comprehensive interaction with these two agencies whose land borders the endowment lands and who will be deeply affected by what IDL chooses to do.
- Although the plan mentions several times the City of McCall and Valley County and the necessity of outreach to these entities, the plan does not address the comprehensive plans of the city or county. The long -range plans of the city and the rate at which the sewer district can supply hook-ups does not seem to mesh at all with what IDL is postulating. For example, the number of residences that IDL is projecting for their parcels and the revenue they expect to get from these projections do not seem to match the present sewer situation in McCall. The projected revenues would need to be cut back as IDL aligns its number of residences with the reality of the sewer density overlay map. In addition, McCall has a back-log of urgent repairs and when those are finished in five years the city will have to prioritize new hook-ups and it is hard to imagine that the endowment lands would be first in line. Any potential developers will find their plans significantly curtailed without access to basic utilities.
- There is no acknowledgement of the reality of climate change and how it will affect the future of these lands and the lake. We know the inevitable rising temperature of the lake will endanger its health and make it much more vulnerable to the impacts caused by the development proposed in IDL's plan. In addition, it is clear that fire and fire management will be increasingly a big issue in this area exacerbated by the changes in climate. The development proposed in the IDL plan does not recognize the dangers of building in the wildland -urban interface and all the problems that could cause in terms of increased fire potential and with fire fighting priorities and capabilities.

The current plan is not a plan for managing these lands for the endowments and the citizens of Idaho. It is a plan for disposing of these lands.

Thank you for your time and attention.

Jeff Canfield
1102 Buckboard Way
McCall, Idaho
208-741-4311

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 2:40 PM
To: Comments
Subject: Comment Submitted

From: Shannon Corbeil at volatilecurlz@hotmail.com
Phone: 2086347660
Address: PO Box 763
City: McCall
State: Idaho
Zip Code: 83638

Comment:

My love for the natural landscape and beauty of Idaho motivates me to urge the Land Board Commissioners and Idaho Department of Lands Personnel to move with consideration and respect with regards to the Payette Endowment Lands Strategy (PELS) draft. While it is your fiduciary responsibility to help provide education resources for the state of Idaho, it is also your duty as a protectorate to defend the natural lands, lakes, and rivers of McCall. Furthermore, you have a trust with the current citizens who invested heavily — for some, like my family, who invested all of their life savings into a home that would provide clean air and water and quiet companionship with nature.

I urge you to proceed with creativity and good faith in order to find "a win-win solution for the McCall area endowment lands is one that preserves state ownership, the health of the lake, and public access to these lands and meets the fiduciary obligations as stated in the Idaho constitution."

From: Sid Anderson
Sent: Monday, March 1, 2021 2:45 PM
To: Renee Jacobsen
Subject: FW: Payette Endowment Lands

From: Sarah Wissenbach <sarah.aspen23@gmail.com>
Sent: Monday, March 1, 2021 2:44 PM
To: bwoolf@sco.idaho.gov; governor@gov.idaho.gov; lawrence.wasden@ag.idaho.gov; Idenny@sos.idaho.gov; sybarra@sde.idaho.gov; Scott Corkill <scorkill@idl.idaho.gov>; Sid Anderson <asanderson@idl.idaho.gov>
Subject: Payette Endowment Lands

Governor Little, and the members of the Idaho Land Board,

Thank you for the opportunity you have given the public to comment on the Payette Endowment Lands.

I am writing to you as an Idaho resident who has been visiting McCall for the past twenty-nine years. The Payette Endowment Lands hold a special place in Idaho for many reasons.

These lands contain the watershed for Payette Lake which provide the drinking water for the City of McCall. Development in this area could allow pollutants and erosion to run off and affect the quality of water. The water from this watershed is critical downstream, all the way to the Snake River.

These lands provide habitat and corridors for so many species of wildlife. There are such few miles of lake shore that are not developed, and any more development would be harmful to the wildlife in these areas.

Currently, a private party has made and aggressively marketed an unsolicited proposal to acquire most of the McCall area endowment lands within the Impact Area and adjacent to it in exchange for timber lands in north Idaho. Any large-scale land transfer would lead to more development than the lands can handle, put too much control in the hands of one private party, and is inconsistent with the framework and process denoted in the Payette Endowment Lands Strategy.

Given the importance of the McCall area endowment lands to the citizens of McCall, Valley County, and the State of Idaho, there should be a method for citizens to provide input and support for potential changes to these lands within the Payette Endowment Lands Strategy.

Please take your time on making any changes for these lands. You are responsible for the open space, water quality and natural resources of these precious lands. Slow down and make sure the decisions made are the best for now and in the years to come. Innovative solutions need to happen to ensure that Idaho citizens and the Endowment Fund benefit from the Payette Endowment Lands for now and for future Idahoans to come.

Sincerely,

Sarah Wissenbach
Boise, Idaho

From: Tammy Armstrong
Sent: Monday, March 1, 2021 2:57 PM
To: brian.d.harris@usda.gov
Cc: Scott Corkill; Sid Anderson; Renee Jacobsen; Kellie LaBonte
Subject: FW: Comment Letter on Draft PELS - Payette National Forest
Attachments: 20210301 PELS Comment Letter signed with map.pdf

Good afternoon Mr. Harris:

Thank you for submitting your comments. I am forwarding your attachment to Renee Jacobsen and Kelli LaBonte as they are the individuals that are overseeing the comments through our on-line process.

Regards,

Tammy Armstrong

Tamara L. Armstrong
Real Estate Program Specialist

Idaho Department of Lands
300 N 6th Street, Suite 103
Boise, ID 83702
208-334-0215

From: Harris, Brian -FS <brian.d.harris@usda.gov>
Sent: Monday, March 1, 2021 2:54 PM
To: Tammy Armstrong <tarmstrong@idl.idaho.gov>
Cc: Scott Corkill <scorkill@idl.idaho.gov>
Subject: Comment Letter on Draft PELS - Payette National Forest

Hi Tamara, attached is the Payette National Forest's comment letter to the DRAFT PELS. Thank you for the opportunity to participate!



Brian Harris
Public Affairs Officer
Tribal Liaison
Forest Service
Payette National Forest
p: 208-634-0784
c: 208-634-6945
brian.d.harris@usda.gov

500 North Mission Street
MCCall, ID 83638
www.fs.fed.us



**Caring for the land and serving
people**

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File Code: 1560
Date: March 1, 2021

Dustin Miller
Director
Idaho Department of Lands
300 N. 6th Street, Suite 103
Boise, ID 83702

Dear Director Miller,

Thank you for the opportunity for the Payette National Forest to be a part of the Payette Endowment Lands Strategy (PELS) Focus Group. While the missions of the Forest Service and the Idaho Department of Lands (IDL) differ, we have enjoyed many years of working in close partnership to address land and resource matters. Being neighbors in a community that cherishes its open space and unfettered access has often made our boundaries nearly irrelevant; and certainly wildfire, insects and disease, and other such natural processes, know no such bounds.

As you know, plans for these endowment lands are of great interest to us. Through this process we will continue to provide thoughtful and productive comments, and we will continue to work with you to help address concerns into the future.

Upon review of the draft PELS, a discussion on wildfire and the Wildland Urban Interface (WUI) was notably absent. As IDL considers future uses for these endowment lands, a recognition of wildfire risk and the increased negative effects on life and property should be addressed. Many of the identified parcels are in the heart of timbered lands with a high wildfire return interval. Wildfire suppression efforts in the WUI can be significantly thwarted by access, as well as the need to provide for public safety.

Forest Service lands along the western border of the city of McCall abut true WUI conditions, while lakeside WUI conditions continue north and to the east bordering endowment lands. The addition of more residential properties and high cost values at risk will significantly compound the issue. The knowledge gained through multi-jurisdictional fire planning and wildfire scenario run-throughs in the area has clearly illustrated that WUI and the compounding factors are the number one concern today, not to mention potential future impacts. With a potential increase in construction of private residences or other high value infrastructure within the WUI, the devastation of private property, loss of life, and an increase in expenditures of tax dollars should be considered.



Continued population growth will not just result in the development of properties adjacent to public lands, but increased visitor use to recreation areas on these public lands, in turn increasing the risk for human-caused wildfires and extending the size of WUI within the area. Even low-density development with limited access further exacerbates this hazard. There are opportunities to reduce fuels in and around these properties, as IDL has done in the past, but over time fuels will continue to accumulate - adding to the increased potential of a catastrophic event without an acceptable probability to mitigate. Even if fuels are modified, there is always potential for wildfire to have a negative impact, and the sale of lands to private entities will not guarantee the same fuel mitigation practices that have been shown to improve wildfire outcomes. With continued residential development, our margin of success will be further reduced, posing an increased risk to life and property as has been seen in the complete loss of entire communities in California and Oregon in recent years.

Access to public land not only for fire suppression, but for recreation, is also of concern. Many of the parcels in Tier III and IV provide access between the community and Forest Service public lands as shown on the attached map. This map displays the critical connections as well as infrastructure on National Forest System Lands adjacent to IDL lands. It further shows Forest Service easements on roads that pass through IDL lands as well as a road and trail without easements that the Forest Service has interest in acquiring. Patrons of public lands utilize these easements to recreate on the Payette National Forest year-round. Recreation continues to be an economic driver for local communities and recognizing the value and community connection to these IDL lands is important. Unfortunately, recreation and its economic benefits are not fully addressed in the draft (PELS).

The inclusion of descriptions of known recreation facilities and areas used for dispersed recreation activities is vital. The importance of access opportunities such as roads, trails, and parking lots to areas where hunting, berry picking, hiking, winter and summer sports, and a host of other activities, that occur on these endowment lands cannot be diminished.


Currently, the Payette National Forest is considering the addition of trails and recreation facilities in the greater McCall area. These trails will provide enhanced opportunities for the public which, in turn, supports our local economy. Destination locations such as Bear Basin, Fall Creek, Twah Creek, Copet Creek, Brush Creek and the east side of Brundage Mountain are key areas where a level of reduced access through current IDL lands could affect future recreation opportunities for Idahoans and tourists alike. Ensuring that access and recreational opportunities are maintained and enhanced is an important consideration for the future of IDL lands.

To meet the needs of the community and land management entities, we highly encourage the development of a community-wide comprehensive recreation strategy for the area surrounding McCall. This strategy would be a way to enhance opportunities and

connectivity between communities and public lands within, and outside of, the City of McCall's Area of Impact. The importance of developing this recreation strategy is paramount, and the Forest Service will be a contributing partner of such an effort. This type of strategic plan would be beneficial in terms of identifying those high value areas, including additional economic opportunities that could benefit IDL, and could be critical in determining potential uses, development, or disposition for parcels. Additionally, this information could help in identifying those areas where additional lands transactions such as acquisitions or exchanges would be advantageous, and where conservation easements may be possible.

As mentioned at the first Payette Endowment Lands Focus Group discussion, disposition could include land exchanges or acquisitions. Though we understand that this is not the time to discuss specific parcels, there are several checkerboard properties that we may want to discuss in the future that can be advantageous to both the Forest Service and IDL.

Sincerely,

**LINDA
JACKSON**  Digitally signed by
LINDA JACKSON
Date: 2021.03.01
14:11:16 -07'00'

LINDA L JACKSON
Forest Supervisor

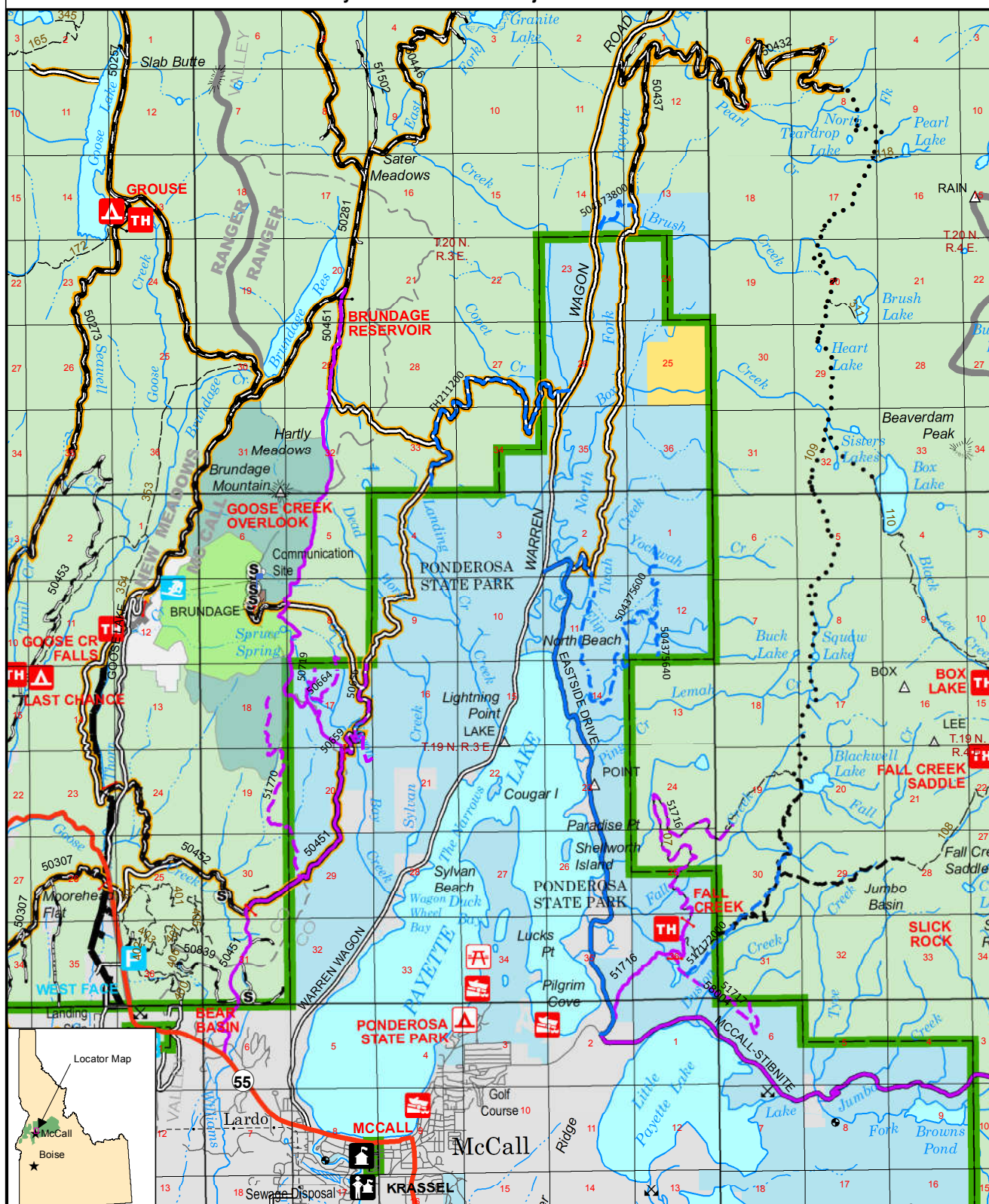
Enclosure

cc: Brian Harris



USDA Forest Service, Payette National Forest

Payette National Forest: Adjacent Forest Service Facilities and Uses



Special Uses Permits Surrounding Endowment Lands

- Permitted Special Uses Areas
- IDP Primary Overhead Power Lines

Road Easement Status

- Open Roads With No Easements
- Closed Roads With No Easements
- Open Roads With Existing Easements
- Closed Roads With Existing Easements

Brundage Permit Ski Area

- Lift Served Area Boundary
- Private Land
- Ski Area Permit Boundary

Recreation Opportunities Surrounding Endowment Land

- Vehicles less than 50"
- Open to Motorcycles
- Non-Motorized Trails
- Winter Motorized Travel Routes

Recreation Site

- BOAT RAMP
- CAMPGROUND - FS
- CAMPGROUND - NON-FS
- RD OFFICE

Supervisors Office / HDQTRS

- TRAILHEAD
- PARKING
- PICNIC / REST AREA - NON-FS
- SKIING - DOWNHILL

Administrative Forest Boundary

- Forest Service
- State Surface Ownership
- Bureau of Land Management
- Private
- State



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Date: 2/22/2021

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From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 2:56 PM
To: Comments
Subject: Comment Submitted

From: Rhet Wadsworth at rhet@wadsdev.com
Phone: 8018156713
Address: 166 E 14000 S #210
City: Draper
State: Utah
Zip Code: 84020

Comment:
I am NOT in support of the acquisition/development of this land. It jeopardizes the gem that McCall is.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:11 PM
To: Comments
Subject: Comment Submitted

From: Josh Rodriguez at joshtrodriguez@gmail.com
Phone: 4065319973
Address: 529 N HILLVIEW DR
City: BOISE
State: Idaho
Zip Code: 83712

Comment:

I appreciate the opportunity to comment here and express my concerns with any sale or transfer of public lands around McCall.

I understand that IDL is required under the state's constitution to maximize revenue from the lands under its jurisdiction, but selling off that land seems shortsighted. This looks to me like a short term financial windfall at the expense of future benefits. The benefits that would be lost include long term financial returns, maintaining traditional revenue sources in perpetuity, and preserving public access to those lands.

In my opinion, what makes McCall and the surrounding areas a desirable place for locals to live and visitors to visit is the public land that surrounds Payette Lake. Disposing of public acreage will decrease the areas value as a place where generations of families have hunted, fished, and hiked.

I hope that Idaho chooses to not entertain offers like the one from Trident that would create a big win for few individuals and a huge loss for Idahoans, but instead decides to keep that land under state ownership and continues to generate revenue through traditional and non-traditional ways that preserve access. I'd rather see a few more log trucks roll out of the hills that huge homes built atop them.

Renee Jacobsen

From: Tammy Armstrong
Sent: Monday, March 1, 2021 3:12 PM
To: BessieJo Wagner
Cc: Anette Spickard; Sid Anderson; Renee Jacobsen; Kellie LaBonte
Subject: FW: Comment Letter for Payette Endowment Land Strategy
Attachments: 2021.02.26 Land Board Comments Letter PELS.pdf

Good afternoon Ms. Wagner:

Thank you for submitting your comments. I am forwarding your attachment to Renee Jacobsen and Kelli LaBonte as they are the individuals that are overseeing the comments through our on-line process.

Regards,

Tammy Armstrong

Tamara L. Armstrong

Real Estate Program Specialist

Idaho Department of Lands
300 N 6th Street, Suite 103
Boise, ID 83702
208-334-0215

From: BessieJo Wagner <bwagner@mccall.id.us>
Sent: Monday, March 1, 2021 3:08 PM
To: Tammy Armstrong <tarmstrong@idl.idaho.gov>
Cc: Anette Spickard <aspickard@mccall.id.us>
Subject: Comment Letter for Payette Endowment Land Strategy

Hi Tamara,
Please find attached a letter to the Idaho State Land Board regarding the Payette Endowment Land Strategy.

Thank you,
BessieJo Wagner, CMC | City Clerk
216 E Park Street | McCall | ID 83638
Direct: 208.634.4874 | Fax: 208.634.3038



Web: www.mccall.id.us
Blog: cityofmccall.wordpress.com
Social: [Facebook.com/cityofmccall](https://www.facebook.com/cityofmccall)



City of McCall

www.mccall.id.us

216 East Park Street
McCall, Idaho 83638

Phone 208-634-7142

Fax 208-634-3038

February 26, 2021

Idaho State Land Board

Re: Payette Endowment Land Strategy

Dear Governor Little, Attorney General Wasden, Secretary of State Denney, Controller Woolf, and Superintendent Ybarra;

The future of land development and conservation around Big Payette Lake is a primary concern for our community and will impact Idaho for generations. We are heartened the Strategy calls for using the McCall Area Comprehensive Plan to inform your decisions and by Director Miller's comments in support of finding "win-win" opportunities. We therefore strongly urge you to consider the following:

Big Payette Lake is the sole source of drinking water for our community. It is a critical natural resource for our community that must be protected. Analysis of the endowment lands within the watershed that feeds the Lake should evaluate mitigation measures to: protect the shoreline and riparian areas; to prevent untreated run-off and erosion impacts; and retain the maximum amount of undisturbed drainage areas with natural vegetation for low cost treatment of run-off. The Strategy and subsequent plans should honor the decades of effort by Idaho DEQ and our local community to protect the water quality of the Lake.

Prioritize the development of the "State 80" within our City limits for entry to mid-level priced housing. Use this as a strategic opportunity to work with the City and our partners to address the local housing crisis. This will benefit our economy, employers, families, and workers while creating economic value for the endowment fund.

Prioritize the use of conservation easements which will protect the most sensitive parcels adjacent to the Lake and allow for recreational uses on other parcels while maintaining state ownership. Allow time for local conservation groups and other stakeholders to create these easements which do provide fair market value compensation to the endowment fund and will also meet the public's goals for access, recreation, and conservation.

Continue to provide for stakeholder engagement throughout your processes. Problem-solving and innovation come from utilizing the talents of the community. It builds goodwill and understanding for your efforts.

The City of McCall thanks the Board for their careful consideration of endowment land disposition in our community. Your staff, specifically Ryan Montoya and Scott Corkill, should be commended for their extra efforts to engage with the City and our community. We look forward to continuing our work with them as part of the Focus Group and thereafter.

Sincerely,

Robert S. Giles, Mayor

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

1	Megan Neve	5121 N. Greyloch Way, Boise ID 83704	<p>Establish and maintain a long range stakeholder advisory committee. This committee would help local governments and citizens have a voice in considering impacts to our economy, ecology, and the culture of our community.</p> <p>For IDL to recognize the value of the land beyond a one time, bottom-line sale price. The Endowment Lands' impact on tourism, local ecology, and the health of the lake has significant consequences for local economies and tax revenues, including funding for local schools.</p>
2	Savilla Kiely	PO Box 628, McCall, Idaho 83638	<p>Establish and maintain a long range stakeholder advisory committee. This committee would help local governments and citizens have a voice in considering impacts to our economy, ecology, and the culture of our community.</p> <p>For IDL to recognize the value of the land beyond a one time, bottom-line sale price. The Endowment Lands' impact on tourism, local ecology, and the health of the lake has significant consequences for local economies and tax revenues, including funding for local schools.</p> <p>Please don't let the dollar signs influence the changes that would impact your local residents that have lived in McCall and valley for 50+ years.</p>
3	Ann M. Nies	1150 heavens gate court, McCall, Idaho 83638, P.O. Box 1932, McCall	<p>Dear Council Members.. Please pressure the IDL to do the following: Establish and maintain a long range stakeholder advisory committee. This committee would help local governments and citizens have a voice in considering impacts to our economy, ecology, and the culture of our community.</p> <p>Consider the value of the land beyond a one time, bottom-line sale price. The Endowment Lands' impact on tourism, local ecology, and the health of the lake has significant consequences for local economies and tax revenues, including funding for local schools.</p>
4	Diane Kushlan	1707 W Resseguie Street, Boise, ID 83702	<p>My objection is to the process that IDL has undertaken in the development of this plan. It appears to have been drafted internally by staff with little or no involvement from others outside the agency. This process may have worked 100 years ago when the endowment lands were created or even a dozen years ago, but times have changed.</p> <p>I understand and appreciate the mission of the State Lands Board and the purpose of the endowment lands (my father was one of the lucky ones to receive the extraordinary care provided by the State Veteran's Home, funded in part by revenue from endowment land) However, the IDL should be required to meet the same best practices for collaborative planning that by state statute is required</p>

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>of all local governments in the state.</p> <p>The process undertaken in development of the plan may have worked in earlier years when state lands were isolated parcels far distances from any rural communities, but this is not the case today. The decisions made on these lands have substantial externalities for adjoining jurisdictions including, environmental degradation, transportation impacts, utility capacity, and affordable housing. For these reasons these adjoining jurisdictions have a stake in the outcomes of the plan.</p> <p>And there are good examples of successful collaborative planning among levels of government in Idaho. Just review the Owyhee Initiative and the Clearwater Compact, to name a few. Why go down a road of conflict, controversy and turmoil when collaborative processes have been demonstrated to be successful without the strife?</p>
			<p>Dear City Council Members,</p> <p>As a long term investor and financial executive, my belief is that the Trident proposal before the Idaho Land Board is a pig in a poke. It is based on half-baked assumptions about value and embroidered with promises that this one-time trade will produce a mecca in McCall for homeowners and tourists while leading our State to the promised land of timber annuities. I believe that it would be reckless for the Board to succumb to the pleasant assumptions behind this mirage.</p> <p>Your legacy will be forever influenced by the decision the Land Board makes regarding this project. I urge you to pressure the Board to do the following:</p> <ul style="list-style-type: none"> • Establish and maintain a long range stakeholder advisory committee. This committee would help local governments and citizens have a voice in considering impacts to our economy, ecology, and the culture of our community. • Recognize the value of the land beyond a one time, bottom-line sale price. The Endowment Lands' impact on tourism, local ecology, and the health of the lake has significant consequences for local economies and tax revenues, including funding for local schools.
5	Alan Shealy	2153 East Solitude Ct, Boise ID 83712	<p>Thank you for your consideration in this matter.</p> <p>Sincerely yours, Alan Shealy, Boise</p>
6	Laura Shealy	2153 E Solitude Ct	<p>Dear IDL,</p> <p>As a long time homeowner on Payette Lake and a member of the Big Payette Water Quality Council board, I support the following with regards to the McCall area Endowment Lands.</p>

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>Establish and maintain a long range stakeholder advisory committee. This committee would help local governments and citizens have a voice in considering impacts to our economy, ecology, and the culture of our community.</p> <p>For IDL to recognize the value of the land beyond a one time, bottom-line sale price. The Endowment Lands' impact on tourism, local ecology, and the health of the lake has significant consequences for local economies and tax revenues, including funding for local schools.</p> <p>I appreciate the large task at hand and believe that taking the above steps will serve all of us well.</p> <p>Thank you, Laura Shealy</p>
7	Heather Susemihl	121 Commerce St. McCall, ID 83638	<p>It is time to re-consider what best and highest use means. There is much more value to our community, the environment around the lake and all the wild places of Idaho that so many have come here to enjoy, than the monetary potential of state leased land. Please do not ignore the plea of your citizens to protect the undeveloped lands we have left.</p>
8	Scott J Bowes	195 Commerce st	<p>Concerning the State endowment lands.</p> <p>I will pay more in taxes to keep the land as state property, so all people of the State of Idaho can use.</p>
9	Marilyn Olson	P.O. Box 455 (890 Timber Ridge Ct), McCall, ID 83638	<p>Please establish and maintain a long range stakeholder advisory committee. This committee would help local governments and citizens have a voice in considering impacts to our economy, ecology, and the culture of our community. For IDL to recognize the value of the land beyond a one time, bottom-line sale price. The Endowment Lands' impact on tourism, local ecology, and the health of the lake has significant consequences for local economies and tax revenues, including funding for local schools. Please don't let the dollar signs influence the changes that would impact your local residents that have lived in McCall and Valley County for 40+ years. Thank you for your time and consideration.</p>
10	Jim Baldwin	417 Virginia Blvd	<p>Hi, Valley county resident of 8+ years here. I moved from a small backwater Idaho town to Cascade for work in 2012. I immediately fell in love with the area and decided to put down roots. Even in this short time I have seen McCall and the outlying towns explode in popularity. People love it here, and why wouldn't they? However, the magic and tranquility and beauty of this place is in danger. Trident Holdings wants to take the best tracts of public land and turn it into top-tier real estate for profit and profit alone. There's no "preservation" in their plans, regardless of the clever marketing done by their team. I oppose any transfer of public lands to these greedy land grabbers, and I have yet to speak with a single Valley</p>

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			County resident that supports said transfer. Your constituents are DEMANDING that you oppose Trident with all of your might, so please, listen to them. It's the City Council's duty to represent the people who voted them into office, and the people do not want this transfer to take place in any way, shape, or form. PLEASE, for the sake of the love which we hold for these mountains, lakes, and byways, oppose them. Say NO to Trident! Thank you
11	Sheree Sonfield	PO Box 295, McCall, ID 83638	By whatever means and tools at your disposal, the Trident Proposal and land grab absolutely must be stopped or McCall will turn into a place so different that none of us here now will value living here. Consider the threat to our drinking water, affordable housing, negative impact on small business (eg employee shortage, housing shortage). Water quality may be the biggest negative, and the City is the provider of safe drinking water. So there's a direct objection. I'm not even sure that better and much more expensive water treatment methods are possible to purify water at a certain point. Please don't buy their lies about increases in property tax revenues, it's never enough to cover all the increased expenditures and long term impacts, there are many books and studies on this topic. Thank you for your hard work.
12	Robert Bechaud	664 Woodlands Drive, McCall	I much prefer to leave development of endowment land to the State, rather than to a private business. Regarding potential commercial development in the Deinhard area, I have two concerns. First, this is a school area so traffic related issues need to consider safety and congestion. For example, a strip mall might result in too much traffic. Second, development should occur only if/when there is a real demand/need for additional commercial space so that buildings do not sit empty.
13	David J Gallipoli	200 Scott St McCall Idaho 83638	Public sentiment on Trident's proposal is a unanimous, No. The land board's response was "I wonder whether we should even be concerned about what the City of McCall thinks" by Secretary of State Lawrence Denney. And Governor Little admitting, "local goals rarely align with the state's constitutional mandate to maximize long term profits from State land." But does the constitutional mandate say the State is allowed to destroy an ecosystem, destroy wildlife corridors, wildlife habit, and impact McCall's community? Will the State enable Trident to maximize profits at the expense of our ecosystem? At the cost of the beauty that surrounds us? Trident's slick PR campaign to "Preserve McCall" will do the exact opposite; Preserve is defined "as maintaining something in its original or existing state." Growth is inevitable, but we need to think about the cost to the ecosystem. Development approval rarely considers the most critical impact on nature's erosion—the damage from human presence.

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

<p>One solution to preserve McCall's ecosystem would be to declare a one-year moratorium on new residential construction. And I don't say that lightly because I have been in construction and property maintenance most of my life. I know there are faces behind every business that would be affected. I have also experienced boom and bust cycles in the industry, and a sustainable growth plan would prevent bust cycles.</p> <p>One year would give the city council, planning/zoning, wildlife experts, and ecologists time to formulate a sustainable growth plan that places the McCall ecosystem first by considering wildlife corridors, wildlife habitat, forest, and the watershed. The second goal would consider infrastructure and service needs for a growing community. A year to think about how we want to leave this special place to future generations.</p> <p>There has never been a more urgent time to act, so we must act boldly. We need only look at how quickly we have destroyed ten-thousand-year-old ecosystems in less than 200 years, and the world has lost two-thirds of its wildlife in 50 years.</p> <p>We have a choice not to become a Boulder, Colorado, a Bozeman, Montana, or a Jackson Hole, Wyoming, to name a few mountain resort cities that did not control their growth.</p> <p>I urge our City Council to think beyond traditional growth policies and change direction for the environment and our community.</p> <p>Thank You, David Gallipoli , McCall, ID</p>		
14	Kristin Hoff Sinclair	<p>P.O. Box 2867 McCall ID 83638</p> <p>I urge you to oppose the Trident proposal and ask for additional time in moratorium on proposals of sale, exchange or lease for another 6 months. The Trident proposal puts too much power in one groups hands and too much pressure on the lake/drinking water.</p>
15	Jeff Mousseau u	<p>105 Brundage View Ct, McCall, ID, 83638</p> <p>PAGE 1 of 2 - Payette Endowment Lands Alliance</p> <p>The Payette Endowment Lands Alliance (PELA), a grassroots conservation organization in McCall working to conserve and protect the McCall area endowment lands, offers the following comments to the IDL's draft Payette Endowment Lands Strategy. We sincerely appreciate the efforts of the McCall City Council in addressing issues associated with these vulnerable endowment lands, and we are always available to meet/discuss/work with you on this important matter. These comments are on the behalf of PELA.</p> <p>Sincerely, Jeff Mousseau, PELA Board Secretary</p>

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

Provide a Comprehensive Plan:

- The Payette Endowment Lands Strategy should be based on a comprehensive analysis of the McCall area endowment lands as a whole and over the long term. A comprehensive approach whereby all relevant factors are included in the analysis of alternatives and the cumulative effects of parcel by parcel decision making should be used. A broad set of goals should be developed for land preservation, uses, and development.
- Trading or selling these endowment lands and dividing them up into pieces, would sacrifice their long-term value: as an intact ecosystem, as a buffer for the watershed, as a crucial wildlife corridor, as a wildfire barrier, as a refuge for plant and animal diversity, and as a source of resilience insurance in climate chaos.

Protect the Public Trust:

- Elected officials have a public trust responsibility for water quality. Payette Lake waters are the source of drinking water for the City of McCall and degrading the quality of these waters represents a direct public health issue. Protecting Payette Lake and its watershed must be a foundation of the Payette Endowment Lands Strategy.
- The critical public trust obligation of Payette Lake and the North Fork of the Payette River watershed water quality as well as other factors including wildlife habitat, wildfire prevention, ecological health, recreational access, angling, and the small mountain town characteristics of McCall merit full consideration in the current Payette Endowment Lands Strategy.

Install a Stakeholder Advisory Group

- The Land Board should support the creation of a stakeholder advisory group to provide input to IDL Payette Lakes Supervisory Area personnel for the McCall area endowment lands. The stakeholder advisory group should be a sincere, long-term effort to engage the community and provide local stakeholders-- who know these lands best-- the opportunity to collaborate in finding appropriate solutions that will also satisfy the Land Board's duties to the endowment trust.
- The McCall area endowment lands are important to the citizens of Idaho, and the Payette Endowment Lands Strategy will undoubtedly serve as a template for endowment lands throughout Idaho. Therefore, it is important to spend the time and effort necessary to get it right. The moratorium on transactions involving endowment lands in the McCall/Valley County area should be extended as necessary to allow this stakeholder group to be formed and provide input.

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			Page 2 of 2 - Payette Endowment Lands Alliance
			<p>Prevent a Wholesale Land Trade</p> <ul style="list-style-type: none"> Any wholesale trade or sale of the McCall area endowment lands for future private development would harm the endowment fund beneficiaries and the citizens of Idaho and overwhelm the ecological capacities of the land and waters in the McCall area, and we oppose any wholesale trade or sale. It has been discussed to trade northern Idaho timber lands potentially worth around \$45 million for the endowment land in McCall worth more than \$1 billion. Clearly, engaging in such a trade would represent a complete repudiation of the Land Board's fiduciary duties, be a violation of the Idaho constitution, would not secure the maximum long term financial return to the endowment trust and institutions, and represent a huge loss to Idaho education. IDL should develop a comprehensive plan in the Payette Endowment Lands Strategy that IDL and the Land Board can rely upon and be bound by in evaluating future proposals for development and transactions related to these lands, and future proposals outside the boundary of this plan should be rejected. <p>Implement Land Conservation Solutions</p> <p>IDL should work with the stakeholder advisory committee to fully explore creative solutions that will yield revenues from the endowment lands, which honor the health of the lands, waters, and ecosystem.</p> <ul style="list-style-type: none"> IDL should continue to evaluate legacy programs such as logging, grazing, and mining while analyzing new methods of deriving revenues that are consistent with the 21st century, including the warming climate, increasing fires and blights in our forests, population growth, and the growing scarcity of undeveloped land. An asset class and business program similar to what has been developed for forestry and grazing should be developed for conservation and recreation leases and easements to support implementation to raise additional revenues on these lands. The Land Board should provide assurances that leases/easements would be legally secure.
16	Jeff Mousseau	105 Brundage View Ct, McCall, ID, 83638	<p>Perform a Thorough Economic Analysis</p> <ul style="list-style-type: none"> When the Land Board and IDL are making determinations about management and transactions regarding endowment lands, they should consider not just the benefits in terms of revenue but also

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>the long-term costs that would result from their decisions.</p> <p>Align Idaho Constitution and Stewardship</p> <ul style="list-style-type: none"> • The economic value of Idaho endowment lands are dependent on sound, long-term stewardship. This stewardship includes protecting and sustaining the health of the lands and adjacent waters, the viewsheds, the ecology, open space, and wildlife habitat. The Land Board should exercise its discretion, and direct IDL to act, to the full limits of its Constitutional authority so that management of the endowment lands becomes aligned with these values and with the IDL's own vision, mission, and values to meet the realities and needs of the 21st century. <p>Do Not Exacerbate Economic Divisions</p> <ul style="list-style-type: none"> • State-owned lands should be retained to allow access to all and prevent growing economic divisions in our community and society. Development of these lands threatens to limit access to only the wealthy.
			Page 2 of 2
17	Rick Puper	713 Bridal Path Way, McCall 83638	<p>As a resident of McCall I urge our leaders to take our voice to the Idaho Land Trust, Gov. Little and Trident Holdings and ensure that we truly PRESERVE McCall and her ecosystem, wildlife for future generations to enjoy. It is the single most important asset of the area and if we allow it to be traded, sold, developed beyond local planning and and input- why even have local leadership? I trust you all will strive to listen to the unanimous voices of our community and block Trident and continue to let our community guide our lands, schools and businesses. Please take a stand and take control! Thank you for all your services in this critical time.</p>
18	Edith R Welty, MD	939 Flynn Lane, McCall, ID 83638	<p>I'm writing to you regarding the important issue of strategic planning for the 5500 acres of endowment land adjacent to Payette Lake and McCall, as well as for all the endowment lands in Valley County. The Payette lakes and the surrounding endowment lands are a precious heritage that must be preserved for all generations to come. There are several citizens' organizations striving to assure that disposition of these lands is optimized to preserve the ecosystem and natural beauty of the lake and land, while also helping the Idaho Dept. of Lands to fulfill the Idaho constitutional mandate to maximize financial returns from them for the beneficiaries. These organizations include the Big Payette Lake Water Quality Council, the Payette Endowment Lands Alliance, Idaho Conservation League, Payette Land Trust, Idaho Wildlife Federation, and others that have much citizen input and support and that would like to participate as stakeholders and representatives of the citizens as an advisory group to the IDL, as IDL revises and implements their Payette Endowment</p>

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>Land Strategy (PELS). There is a fine balance between preserving this land and lake for their high value as natural resources, while still fulfilling the public trust to the beneficiaries.</p> <p>Payette Lake is not only a primary attraction for visitors from all over the world, but is also a critical watershed and primary drinking water source for McCall. Any use of land close to the lake shore must be planned carefully to prevent contamination of the lake, while still attracting the visitors who contribute to the economy of McCall and Idaho. The surrounding lands must be preserved for their natural beauty and critical wildlife habitat by carefully limiting land sale and allowing ongoing low impact public access as much as possible. Given that McCall is growing and that the number of visitors has rapidly increased since onset of the COVID pandemic, it will be important to expand careful management of these lands to ensure that public access does not contaminate the lake, damage the surrounding land, or negatively impact wildlife.</p> <p>Conservation easements and expanding Ponderosa Park are two potential strategies for assuring that the maximum natural value of these lands and lake are protected for their long-term value, as opposed to land sale for development or for wealthy individuals who will build large homes and make it more difficult for middle income families to buy land in this area. Quick sale has only a short-term value that will degrade the land and lakes and will limit land use to only the wealthy. Other strategies include continued judicious timber harvesting, grazing, and other land uses that fulfill the constitutional mandate.</p> <p>Please ask IDL to:</p> <ol style="list-style-type: none"> 1) Extend the moratorium on making decisions on these lands until the public has time to digest the PELS and provide input, 2) Incorporate local stakeholder organizations as advisory groups in their decision-making, 3) Not sell parcels or large swaths of this land to wealthy developers or individuals who will likely block public access to the lakes and land and further exacerbate wealth inequality. 4) Incorporate strategies such as conservation leases and expansion of Ponderosa State Park to manage land use and protect water quality. <p>Thank you for your consideration and your ongoing work.</p>
19	Darby Webb	1299 Warren Wagon Rd, McCall, ID	<p>This comment is in reference to the Payette Endowment Lands Strategy. The McCall area endowment lands are special and unique. I appreciate the time placed into the document and suggest that the following issues be addressed prior to approval:</p> <ol style="list-style-type: none"> 1. Payette Lake is held in public trust and it's health must be of utmost importance and consideration. It is the sole source of drinking water for McCall and this is paramount. We do not want a situation like Lake Coeur d'Alene in the future if development is

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>uncontrolled.</p> <p>2. A large scale transfer of these lands to one group/private party for development is not responsible.</p> <p>3. Access to public lands is critical for tourism as well as recreation for local citizens.</p> <p>4. An advisory group with citizen and stakeholder input would likely lead to the best acceptable outcome for all parties.</p>
			<p>I oppose the McCall area IDL land exchange proposed by Alec Williams and his company Trident. Not only will this bring increased demand to the lake, watershed, wildlife habitat and landscape, it will also impact our mountain community.</p> <p>People use these lands to recreate, fish, hunt, hike, bike, motorize and gather food and wood. This will negatively impact the traditional use of this land by privatizing and shutting much use off to the people. It will also put increased demand on the ecosystem with large scale/unmoderated development.</p> <p>I have heard IDL has used “the constitution” as an excuse not to take the time and do what is right for the environment and surrounding communities. This land is only increasing in value, not value that should be sold or traded but value to our planet and value to current and future generations.</p> <p>We must work together to keep this land undeveloped, to keep it for everyone to use and to survive for future generations. If it requires the IDL to revise the constitution I see that as a win. If it requires Our city council members, towns people, activist groups and the land board to work towards a solution this is a win.</p>
20	Lea albright	PO Box 2741, McCall ID 83638	Let us be a positive change that surrounding counties and states can take example from. Let us to the right thing and protect this land.
21	Ian Cruess	1640 Forest Trails Ave	I stand firmly in objection to the land exchange presented by Trident. I do not trust their motives nor their word. If they’re backed by investors who want a return, I do not believe the land will be preserved with the wildlife, ecology and local land users as the top three priorities.
22	Judy Anderson	13775 Nisula Road	<p>Re: Critique of the Payette Endowment Lands Strategy submitted by Idaho Department of Lands to the Land Board on December 15, 2020</p> <p>PAGE 1</p> <p>In spite of Secretary of State Denny’s statement in the Star News questioning why the Land Board should even care aDear Members of the McCall City Council and Staff,</p> <p>bout what the City of McCall thinks, IDL has responded to pressure for public comment on its plan and even set up a short term “focus</p>

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

group” inviting the city and other stakeholders. I am writing to ask you to consider the following critiques of the strategy plan when you make your comments and participate in the focus group.

1. The most unsettling element of the plan is the total dismissal of Payette Lake. There is no mention of even considering the health of the lake and the watershed (much less our drinking water source) in any of their plans for these lands. These lands form a halo around the lake and provide a necessary buffer protecting not only Big Payette, but also the North Fork of the Payette, the mouth of Lake Fork Creek and Little Lake from over-development, run-off pollution, and sedimentation. The Lake is not only our water source and our love, but our economic driver and its health and the health of its tributaries is fundamental to our community. It is also the driver for the high revenues IDL hopes to get for its land sales, so it seems that its protection is a no-brainer.

2. The Lake is another public trust obligation for the State and the tributaries running into the lake are corollary to that trust. That public trust obligation should be considered as important as the state’s fiduciary duty to the endowment land beneficiaries.

3. The value of the lands lies in their connectivity. They are contiguous with the Payette Forest providing a crucial big game corridor, as well as access to the forest, lakes, river and creek. Their continuity also provides insurance against the effects of ecological fragmentation with its proliferation of noxious weeds, increase of pollution and loss of the resilience of biodiversity. This connectivity allows open opportunities for recreation as well as opportunities for IDL to offer long-term conservation/recreation easements and leases. These opportunities for long term revenue generation for beneficiaries would be lost with fractured land parcel development.

4. The IDL plan sets out a 20 year timeline for development/selling off of 13 parcels of state land. The long timeline and the tiered arrangement of parcels along the 20 year span are meant to perhaps explore options or to “participate in city and county processes” or to “convene a stakeholders group” or to “conduct public outreach”. But nowhere in the plan does it say the needs and concerns of the comprehensive plans of the city and county would be considered. And there is no guarantee of adherence to the 20 year schedule. If someone came in with “a suitcase full of money”, could they completely upend the whole tiered scheme and could blocks of land in tier IV, for example be sold off immediately?

THIS COMMENT IS CONTINUED ON PAGE 2

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>PAGE 2 of continued comment</p> <p>Many of us had hoped one of the ideas of the plan was to give McCall some stability in planning. Yet the plan seems most interested in “taking advantage of opportunities for higher revenue generation.” That possibility for higher revenue is completely driven by the desirability of living in McCall. And that desirability is driven by the proximity to a healthy Payette Lake, the easy access to quality outdoor recreation, the character of McCall as a small mountain town that cares deeply about the environment and the culture supported by the city’s careful planning. Ironically all these things could be at risk if the state lands around McCall are sold and developed. And that it turn could undermine the high revenue expected for other state land sales. Also if IDL can acknowledge the debt that it owes to the city and people of McCall for making their lands way more valuable (in the past few years the state has made millions off of the sale of the cottage sites), shouldn’t IDL at least be a good neighbor and respect McCall’s desires to create a sustainable, affordable, small town community ? And shouldn’t IDL try and further McCall’s goals in its plan and implementation?</p> <p>5. Lastly IDL seems in its plan to be unaware of various infrastructure limitations most especially the sewer system. It’s projections for the number of residences on its parcels and the worth of the parcels based on those projections seems out of whack with the present sewer capacity of the sewer district. With limited present capacity and pressing need for repairs, priorities for sewer hookups will have to be established and it is hard to imagine that any of the state lands would be first in line. Thus the amount of revenue that the state expects to gain from its lands may be way over estimated if sewer facilities are unavailable and possible development is curtailed.</p> <p>Thank you for your attention, Judy Anderson</p>
23	Judy Anderson	13775 Nisula Road	
			<p>To those reviewing the use of Idaho endowment lands.</p> <p>Public open space around the the community of McCall is the best long term way to preserve Idaho’s diminishing resource of open space. I understand the endowment lands were initially set out to generate revenue for the state however the benefits of a one time sale of land is short sided.</p> <p>Idaho has lost much of the open space from forests to farmland in the past 5 years. If we continue at this pace many of the resources we have valued since our inception will be lost with privatization.</p>
24	Thaona Garber	49 Jughandle Drive	

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>We need to keep Idaho Wild so wildlife, or watersheds, salmon and historic native landscape remains. I'm</p> <p>I am opposed to the proposed purchase of Idaho endowment lands and the development of land and resources.</p>
25	Diana Fields	910 Yew Wood McCall ID	<p>We are strongly opposed to the Trident land development. Please step back and get local input and do not rush the process. The purported surveys conducted by Trident about community support are biased and don't reflect the true community sentiment. The long term effects of the decisions you make cannot be reversed.</p>
26	Adrienne Boland	211 birch lane Donnelly, ID 83615	<p>I whole heartedly disapprove selling public land to take away the rights of the people to use our forests and lakes. So much of Idaho is covered with multi-million dollar homes. Vote no on trident holdings! Keep Idaho wild and affordable for the people that grew up here and care about the land.</p>
27	Thomas Manning	2071 Lakeview Avenue, McCall	<p>Dear McCall City Council,</p> <p>I am writing to express my opposition to the Land Swap/Land Grab being proposed by Mr. Alec Williams of Trident Holdings. I am also writing to express my support for a continued dialog between the Idaho Department of Lands and the Valley County Stakeholders and local government.</p> <p>The 28,000 acre Land Swap/Land Grab being proposed by Trident Holdings would, if it went forward, represent a radical departure from the historic management of these Public Endowment Lands. Wildlife depend on these lands for their survival. The lands are crisscrossed by Elk and Mule Deer in their migrations from the high country to the lower areas. Shiras Moose make their home in the upper reaches of the North Fork Payette Watershed. People and kids depend on these lands also. The schoolchildren (the beneficiaries of the Endowment Trust) deserve a chance to have their voices heard. These kids oppose commercial development of their Public Lands. The schoolchildren represent the next generation that will roam those lands; they represent our future.</p> <p>Any decision regarding management of the Endowment Lands is by nature a Moral Decision. It is neither morally right nor fiscally prudent to put on blinders and invoke "Constitutional Obligations regarding maximal financial returns..." Management of this Public Land has been entrusted to the members of the Land Board; the five elected officials in whom Idahoans have put their trust via the ballot box. Idahoans expect their elected officials to possess a strong Moral Compass. Governor Little has the shared responsibility of protecting Idaho's land and watersheds. Land Board decisions cannot be made in a vacuum, ignoring detrimental effects on the land, the lakes, and</p>

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>the rivers. "Long term benefit", as called for in the constitutional mandate, requires the willingness of elected officials to strive to see 100-300 years or more into the future, to consider what will happen if ecosystems and watersheds are destroyed. If blinders were the rule, and morality and wisdom thrown out of the analysis, we could end up with any of these possibilities and more along the North Fork Payette Watershed, and along the shore of Payette Lake:</p> <ol style="list-style-type: none"> 1) A high-end brothel catering to offshore sex tourism. 2) A nuclear waste storage facility leased for a thousand years to the Federal Government. 3) A fifteen-story Disneyland-style hotel with casino, ten waterslides, and a fleet of several hundred surf rental boats, just south of Ponderosa Park North Beach Unit. <p>Mr. Alec Williams and his newly established Trident Holdings LLC have galvanized the citizens of Idaho and the residents of Valley County against his proposal. Mr. Williams is a 34 year-old just out of law school and business school and whose work experience to date has included a couple short stints working for New York Private Equity. He has never developed any project here in Idaho. He has come from the East Coast to Idaho, intent on using threats of litigation to try to gain control of 28,000 acres of some of the most valuable public land in the state to fashion his very own version of Montana's Yellowstone Club.</p> <p>Alec Williams refuses to disclose his investors, and says the issue is too sensitive for the investor's names to be made public. Excuse me.. we are talking about some land that's extremely sensitive and the investors don't want to be named? When we make decisions about our public lands... we do it in broad daylight under the light of public scrutiny with public meetings with involvement of the local citizenry and the local government entities.</p> <p>I ask the City Council and the Valley County Commissioners to push its case with the Land Board, the legislature and the public. This issue is too important to be left to back room dealings. The Land Board has invoked flawed interpretation of its constitutional mandate too often in the past. They owe a duty of stewardship to the land..."What would Teddy Roosevelt do?"</p>
Jan 28	Thorien	261 Morgan Drive MCCALL Idaho	I have been a resident of McCall for 13 years. I oppose the land swap to preserve what makes this area valuable both economically and environmentally.
29	Bonita Glick	80 Elkhorn Ranch Road,	Please do not privatize our recreational public lands around McCall. Nature's wild lands and our access to them is what makes McCall a healthy, wholesome community.

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

		McCall, Id 83638	
30	Dixie Lewis	475 Kemble lane. McCall. 83638	The selling of the land to Trident seems careless. The problems with this project are huge. I think of fire problems and people trying to exit the area and crowd to HWY 55 during a maCjor fire. A catastrophe is waiting with a quick decision leaving the whole area vulnerable. Is there any planning in place?
31	Michaela Jaquish	16300 US Highway 10 E, Clinton, MT 59825	Allowing the land around McCall to be developed by Trident would be a mistake. The appeal of McCall and the surrounding area is the remoteness, the wildness. Taking that away takes away the reason to visit.
32	Jon Glick	Box 4195, McCall, ID 83638	I want to go on record with my opposition to the land exchange near McCall.
33	Julie Manning	2071 Lakeview Ave	It is critical for the City of McCall and Valley County to have roles in any decision making by the Land Board and IDL that would affect endowment lands in the County. The Land Board should establish a local stakeholder committee to participate and advise in this decisionmaking, particularly with regard to the disposition (sale, lease, swap, etc.) of lands. Any decisions should be based upon the health of the lake and the watershed, health of the lands, and carrying capacity of the ecosystem (including infrastructure, roads, sewer system).
			January 27, 2021
			McCall City Council Members Mr. Bob Giles, Mayor Mr. Colby Nielsen, Council President Ms. Melanie Holmes, Councilor Ms. Cami Callan, Councilor Mr. Mike Maciaszek, Councilor 216 East Park Street McCall, ID 83638 (208)634-7142
			Submitted Electronically via McCall City Council Comments Portal
			RE: Idaho Conservation League's Comments Regarding the Idaho Department of Lands Payette Endowment Lands Strategy
		Idaho Conservatio n League, 710 N. 6th St., Boise, ID 83701	Dear McCall City Council Members: We understand that there is an opportunity for the McCall City Council to submit comments to the Idaho Department of Lands (IDL) Payette Endowment Lands Strategy, which centers on State Endowment Lands in and around McCall, Valley County, Idaho. We
34	Randy Fox		

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

wanted to share with the McCall City Council the recommendations that the Idaho Conservation League will be submitting to the Idaho Department of Lands on behalf of our members who live in or recreate in the area. Since 1973, Idaho Conservation League (ICL) has worked to protect and enhance Idaho's clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. Idaho Conservation League has a long history of involvement in public land management issues. As Idaho's largest statewide conservation organization, ICL represents over 30,000 supporters who have a deep personal interest in ensuring that public lands management decisions protect our quality of life, our land, water, fish, and wildlife, and the communities that depend on these resources.

The Idaho State Endowment Lands which surround McCall's Payette and Little Payette Lakes hold a special place in Idahoan's hearts by providing numerous recreation opportunities for local residents and visitors, protecting water quality, and supporting an ecosystem rich with biodiversity which supports numerous wildlife and plant species. These largely contiguous and undeveloped lands also contribute to the character of the community and are an integral part of why this area is so special.

Trident Holdings, LLC is developing a proposal to exchange some 28,000 acres of State Endowment lands in the McCall area for an unknown number of timberland acres in north Idaho has brought to light the importance of Idaho State Endowment lands to this community. Trident promotes their proposal as a mechanism to "Preserve McCall" through targeted development of highly desirable residential and commercial sites while promoting "improved public access" and the ability to conserve undeveloped lands in perpetuity. We are concerned that the privatization and subsequent development of these lands will threaten the lands and waters many Idahoans know and love, adversely impact the quality of life, recreation opportunities, plant and wildlife populations, and the water quality which all McCall residents and visitors depend on. This privatization will diminish opportunities for recreation and sustainable living such as hunting, fishing, and gathering the abundant natural yields of the forested State lands. The Idaho Conservation League believes that meaningful conservation, recreational access and sustainable economic development need not depend on luxury homes or resort hotels along the lakeshores.

The following document presents our comments and recommendations regarding the Payette Endowment Land Strategy, and includes several potential solutions regarding the management

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

of State Endowment Lands for the benefit of all Idahoans and to ensure the water that McCall and Valley County residents depend on remains clean and healthy for human and wildlife consumption. Thank you for considering our comments as the McCall City Council seeks to find the best path forward for its residents and the rest of Idaho. Should you have any questions regarding these recommendations, please do not hesitate to contact us.

Respectfully submitted,

John Robison Randy Fox
Public Lands Director Conservation Associate
Idaho Conservation League Page 1

Idaho Conservation League's Comments on the Idaho Department of Lands Payette Endowment Lands Strategy

Retain Land Connectivity and Ecological Function

We have long recognized that the economic health and viability of rural communities directly correlate with the health of the lands and water that surround them. Ecosystem health becomes more critical and tied to economic health when we acknowledge that the surrounding landscapes and opportunities they offer are the very attributes that attract people to the region for permanent residency, as a second home location, or as a vacation destination. Clean, drinkable water provides the foundation for a strong, healthy, and economically viable community, and the nation has seen the negative impacts of unhealthy or contaminated water supplies on economic health through the situation in Flint, Michigan, and in other locations throughout the nation. This is especially true for McCall and the health of Payette and Little Payette Lakes, which remain the primary drinking water source for the surrounding communities.

Much of the land surrounding Payette and Little Payette Lakes are Endowment Lands managed by the Idaho Department of Lands (IDL), and stand at the center of the current discussion. While we understand that the State has a constitutional mandate to manage their lands for maximum long-term financial benefit and gain, we do not believe that the State can achieve their long-term financial goals if the proposed actions result in ecosystem degradation.

Development along the lakeshores would likely result in increased sediment delivery to the lake waters and fragmented plant and wildlife habitats, which would degrade water quality and adversely impact wildlife security and habitat health. The 1992 asset

Idaho
Conservatio
n League,
710 N. 6th
St., Boise, ID
35 Randy Fox 83701

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

<p>management plan clearly acknowledges the importance of IDL staff considering the “needs and concerns” of the citizens of McCall and greater Valley County regarding the management and/or disposition of Endowment Lands, and ICL supports McCall and Valley County residents having the opportunity to shape the trajectory and health of their own future. We encourage the McCall City Council to seek out opportunities to work with IDL to conserve lands surrounding critical water bodies, which are part of IDL’s Public Trust, and protect the foundation of McCall’s economic health and security: a sustainable, healthy, and drinkable water source. We address our concerns regarding maintenance of the public trust below.</p> <p>The Endowment Lands in and around McCall contain migration corridors and habitats for numerous species, including mule deer, elk, moose, bears, mountain lions, a variety of raptors and migratory songbirds, amphibians, reptiles, and the numerous plants and insects these animals depend on. Maintaining these corridors and habitats is critical to retaining ecosystem health. Further, maintaining intact migration corridors and habitats ensures the animals that attract people to the area for wildlife viewing, hunting, fishing, or gathering remain on the landscape. Having robust wildlife and plant diversity contributes to the economic success of the region by attracting wildlife enthusiasts of all descriptions who support local businesses.</p> <p>The Payette lakes are also unique in that they are natural bodies of water, unlike the majority of lower-elevation reservoirs found throughout the state. Most of Idaho’s natural lakes are found at higher elevations, reducing accessibility for some and limiting recreation boating opportunities to conveyances that are easily transported. Prior to the construction of Black Canyon diversion dam on the Payette River in 1924 , salmon regularly made the journey from the Pacific Ocean to Payette Lake and beyond to spawn. While salmon and steelhead will not likely return to the Payette watershed, several game fish species continue to thrive in the cold waters of Payette and Little Payette Lakes and in the waters downstream.</p>		
ICL Comments, Page 2		
36	Randy Fox	Idaho Conservation League, 710 N. 6th St., Boise, ID 83701 Public Access to Endowment Lands Recent surveys and questionnaires circulated in the Valley County communities by the Payette Land Trust and the Payette Endowment Lands Alliance demonstrate the importance of having accessible public lands within an easily commutable distance, oftentimes using non-motorized methods. The on-going COVID-19 pandemic highlights the importance of accessible public lands for maintaining

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

physical and mental health. Many local residents and visitors spend more time enjoying the Payette Endowment Lands than other portions of the surrounding Payette National Forest. As urban growth and development inevitably occur, it becomes increasingly clear that conserving public access to public lands is vital to the success of rural communities who rely, at least in part, on tourism trade.

We should not consider land access the sole purview or concern of land-based development proposals. Many recreationists come to the area to enjoy the sailing, water-skiing, wake-boarding, paddle boarding, and kayaking opportunities found at Payette and Little Payette Lakes. Exploring tucked away coves and islands and relaxing or picnicking on lakeshore beaches remains a primary attraction for people who come to the region specifically for water-based recreation. Increased development along the lakeshore by either private or commercial ventures could drastically reduce the public access and aesthetic components that make Payette and Little Payette Lakes special and unique. We encourage the McCall City Council to advocate for retaining public access and protecting the visual aesthetics of these water-based locations.

Public Trust Lands

The waters of Idaho, including Payette and Little Payette Lakes, the tributaries that feed the lakes, and the North Fork of the Payette River are protected and held in Public Trust by IDL, and the lands below the ordinary high water mark are considered public trust lands. State Public Trust lands are fundamentally different from State Endowment Lands in terms of management and goals. Title to these public trust lands remains with the state and the lands are administered, "for the public benefit rather than for a specific beneficiary." We are concerned that privatization of these endowment lands will lead to adverse effects on Public Trust Lands, including the nearby waterways and lands below the ordinary high water marks.

As early as 1925, Idaho Statute and Code recognized the importance of preserving Payette Lake as a "Health Resort(s) and Recreation" location. Regarding the Appropriation of Waters in Trust for People, Statute 67-4301 states:

The governor is hereby authorized and directed to appropriate in trust for the people of the state of Idaho all the unappropriated water of Big Payette Lake, or so much thereof as may be necessary to preserve said lake in its present condition. The preservation of said water in said lake for scenic beauty, health and recreation

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

		<p>purposes necessary and desirable for all the inhabitants of the state is hereby declared to be a beneficial use of such water. (emphasis added)</p> <p>ICL comments, Page 3</p>
		<p>Statute 67-4302 declares that the land between the ordinary high and low water mark, as well as “all other lands of the state adjacent to said lake which are not held in trust for the beneficiaries of the endowed institutions” are to be devoted public access and use “in connection with the preservation of said lake in its present condition as a health resort and recreation place” for Idaho citizens. Further, this public use was found to “be more necessary....than the use of said lands as a storage reservoir for irrigation or power purposes.” While our leaders in 1925 could not predict the development value of these lands and waters, they clearly recognized and acknowledged the value of conserving these natural resources for recreation and health benefits for all Idahoans. We believe these early statutes provide the McCall City Council, IDL, and the diverse stakeholders in the region with the statutory and codified authority to advocate for continued conservation and preservation of these lands for future generations.</p> <p>We understand that Cougar island has been platted and both islands are zoned for “Rural Residential,” allowing for a single residence per 10 acres. Shellworth Island is 13.1 acres and is platted to support a single residence, and Cougar Island, while only slightly larger at 14.21 acres, is platted in a manner that identifies 5 buildable lots, which conflicts with the zoning ordinances.</p> <p>We believe these islands should remain public lands and protected from development. While the portions above the ordinary high water may be considered Endowment Lands that are available for sale or lease to gain “maximum long term financial gain,” direct access and anchorage opportunities remain within the realm of public trust lands and water. The sale or lease of these islands would require constructing docks in or on public trust waters and/or lands, the loss of public access to these islands would clearly benefit the few rather than the public, and would unfairly impact Public Trust responsibilities. A related argument for leaving Cougar and Shellworth Islands undeveloped centers on the City’s limited capacity for infrastructure and services for island residents, and the potential for contaminants associated with septic infiltration systems to leach into lake waters. We are also concerned that the conversion of Cougar and Shellworth Islands from publicly accessed lands to private property or leased with access restrictions may widen the gap of social disparity in the community.</p>
37	Randy Fox	Idaho Conservation League, 710 N. 6th St., Boise, ID 83701

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

<p>We recommend that these islands be considered public trust land in their entirety. ICL recommends the City of McCall work with IDL to find a solution that removes the islands from direct sale or development consideration. One option would be to incorporate the islands as part of Ponderosa State Park. A second option to explore may involve conservation easements that allow for public use while limiting or removing development from the IDL strategy.</p>		
<p>ICL comments, Page 4</p>		
<p>Recommended Solutions</p> <p>ICL believes there are several paths forward that will achieve the goals of both IDL and the McCall community. First and most obvious is to maintain the status quo for the time being. According to IDL's draft Payette Endowment Lands Strategy, the McCall area Endowment lands continue to earn revenues that are commiserate with providing long-term financial benefit and gain, suggesting that an imperative to alter course doesn't exist. While these lands have and will continue to gain value through time, the increasing monetary value directly correlates to the social values and amenities that attract residents and visitors to the area. Moreover, by selling the Endowment Land properties, IDL contributes to the land's appreciation. Any proposal should consider whether lands adjacent to parcels now being considered for sale will be next for dispensation. While maintaining the status quo may help resolve immediate concerns, we do see the value in a long term plan to address the trajectory of growth and IDL management in 5, 10, or 20 years and farther out. Any exchanges, sales or leases for development should be limited to the smaller, isolated IDL inholdings adjacent to existing developments that are already encompassed by the current comprehensive plan. For example, we agree with the Department of Lands's assessment that the Deinhard parcels represent opportunities for additional development in areas already impacted by existing infrastructure. These two parcels are easily accessed by utility infrastructure and would require minimal investment for their development. However, rather than selling these two properties to private developers, we recommend the City of McCall purchase one or both of these parcels, rezone them for multi-family housing, and re-sell either individual lots or larger tracts to developers, with the goal of retaining a certain percentage for affordable housing. As numerous small mountain communities from Ketchum to Telluride have discovered, it is difficult to keep a town running if the people who work in the community cannot afford to live in the community. McCall can avoid this quandary through proactive planning and management, and the Deinhard parcels represent an excellent opportunity to make such an investment in</p>		
<p>38</p>	<p>Randy Fox</p>	<p>Idaho Conservation League, 710 N. 6th St., Boise, ID 83701</p>

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

		<p>the community's future.</p> <p>IDL can also fulfill their constitutional mandate by considering recreational leases on select portions of the McCall area Endowment Lands. This would allow the state to continue harvesting timber from appropriately designated parcels while gaining financial benefit from the lease price. One potential venue may include yurt or small cabin rentals, similar to those already operating within Ponderosa State Park.</p> <p>Ponderosa State Park is a central attraction for the McCall area, and both the local community and broader public would benefit from the park's expansion. There are numerous options available to achieve this goal, including private fund raising drives, direct donation from IDL to the State Park, or through acquisition using Land and Water Conservation Funds (LWCF). The recently passed Great American Outdoors Act assures permanent funding for LWCF, which provides funds and grants to states, soil and water conservation districts, and municipalities to acquire lands for parks and conservation endeavours.</p> <p>ICL comments, Page 5</p>
39	Randy Fox	<p>Incorporating lands adjacent to the existing park boundaries makes sense, allowing park officials to manage the contiguous parcels on a landscape scale. As we mentioned earlier in these comments, adding Cougar and Shellworth Islands to the state park system would provide the greatest benefit to the public, affording permanent protections and enhancing the intrinsic value of Ponderosa State Park. ICL believes the incorporation of Endowment Land parcels into Ponderosa State Park represents a viable solution that also achieves the goals of both IDL and the McCall community. IDL would reduce its management responsibilities for isolated or small parcels, the community would retain full public access to cherished lands, and the move would retain ecosystem connectivity.</p> <p>A third potential option to conserve the McCall area Endowment lands is through conservation easements. IDL can sell the development rights to organizations, like the Payette Land Trust, yet retain physical ownership and the ability to continue reaping the financial benefits associated with managing timberlands. While acquiring the funds for the purchase of these development rights often requires a concerted effort on the part of the whole community, the benefits far outweigh the potential disadvantages. ICL recommends that the McCall City Council explore the option of placing conservation easements on select tracts of the Payette Endowment Lands with IDL. These lands may also be eligible for</p>

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

inclusion in the Forest Legacy Program which helps support keeping private and state lands as working lands while protecting them from development.		
While we believe most Tier 1 parcels and some Tier 2 parcels are suitable for development, we ask that the McCall City Council encourage IDL to not discount conservation easements for any parcels put forth and discussed in the Payette Endowment Lands Strategy.		
<p>A Direct Correlation Between Communities and Ecosystems</p> <p>ICL believes that both natural ecosystems and human communities have a carrying capacity that limits the degree to which a system can support a particular species or characteristic of that community.</p> <p>While growing communities realize an increased tax base and commercial opportunities, there are often challenges that are less known, such as addressing infrastructure capacity like utilities, fire and medical services, and education resources. However, the most significant challenge found from Ketchum to Telluride is the availability of affordable housing for the essential workers who keep the community operating. One component of the carrying capacity in this situation is the ability to house workers within the communities they work.</p> <p>From our perspective, McCall and surrounding communities may be approaching this nexus soon. Once this carrying capacity is reached and housing becomes less affordable for essential workers, the character and nature of the community often changes. The McCall City Council and the citizens you represent are likely having difficult, yet necessary discussions regarding where the limits of growth lie for the town, and how increased growth may change the character of the community, for good or ill. ICL encourages the McCall City Council to continue having these hard discussions to find a path forward that allows for economic and development growth while retaining the character of the community, preserving the quality of life, and conserving the natural resources that make the area special.</p> <p>ICL Comments, Page 6</p>		
Dear McCall City Council Members:		
40	Tracey Kindall	62 Garden Lane / P.O. Box 326 As a 21-year resident of McCall, I am deeply troubled by the potential loss of public Endowment Lands around Payette Lake,

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

particularly the loss of public stewardship via a sale to Trident Holdings or any such private company.

Payette Lakes and its tributaries are precious - they provide clean drinking water, sustain the health of our lake and the Payette River, provide significant habitat for both large and small land and water animals, and provide an important source of recreation. The lands around the northern part of the lake and river - much of which is designated Endowment Land - should be protected and held in the public trust, not only to protect this watershed, but also to protect the integrity of our ecological and human communities.

As Idaho continues to grow, other communities in our state - and in other western resort regions - will face increasing pressure to sell off precious public lands to the highest bidders. This short-sighted thinking trades short-term gain for funds that cannot replace the true value of these lands over time. What happens here in McCall will set a precedent for other similar cases and must be addressed with gravity.

As elected public officials, I ask that you consider broad public sentiment, local impact, and philosophical concerns around the protection of these lands by:

1. Pressuring the Land Board to establish a long-range stakeholder advisory committee to involve local governments and citizens in decisions that will dramatically impact our economies, ecological health, and community cultures.

2. Pressuring the Department of Lands to acknowledge that these lands have deep value that cannot be bought with a one-time, bottom-line sale price. Long-term economic impacts must be included in financial stewardship as the care of these lands directly and indirectly impacts local economies, tax revenues, tourism, recreation dollars, and community livability now and into the future.

Thank you for your time and for hearing my concerns.

- Tracey Kindall, full-time resident McCall

Let's be forward-thinking role models in the Western battle to keep public lands in public hands.

		14170	
		Jefferson Rd	
		McCall ID	
Ragan			
41	Erickson	83638	We oppose the land exchange!

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

42	Ryan Garber	49 Jughandle Dr, McCall, ID 83638	I am strongly opposed to Idaho Department of Lands selling or exchanging lands with Trident Holdings. These are public lands that should be held for the highest and best use of the citizens of Idaho. Once given away, they can never be gotten back.
43	Jennifer Couch	907 Cottage Court, McCall, ID	I am in opposition to the land exchange and would appreciate the presentative support in protecting this precious land.
			<p>Dear McCall City Council and City Staff:</p> <p>Thank you for taking the time to comment on the Idaho Department of Lands (IDL) Payette Endowment Land Strategy (PELS) plan. In your comments, please demand that IDL put the health of Payette Lake and that watershed, our drinking water, at the center of their decision making. Elected officials have a public trust obligation to protect and maintain water quality for the health of the ecosystem and its citizens. Demand that they not divide up those lands into small segments and sell them off encouraging more development around the lake which in turn would put our watershed at risk.</p> <p>Explain to the IDL that the Payette Endowment Lands Strategy must be based on a comprehensive analysis of McCall area endowment lands as a whole over the long term. IDL's plans must work in conjunction and integrate with the City's long-term vision for McCall and consider issues such as the carrying capacity of the sewer system; it's likely that rapid development may not be supported by sewage capacity. Further development will have profound effects on Payette Lake.</p> <p>Last summer a framework for Climate Action Planning was adopted by the City of McCall. As The City of McCall begins its climate action planning process and begins to think about building resilience in the face of climate change, the City should consider how to work with IDL to ensure that our ecosystem remains intact -- as a buffer for the watershed, as a crucial wildlife corridor, as a wildfire barrier, and as a refuge for plant and animal diversity.</p> <p>The Payette Endowment Lands Alliance has sent the City it's comments regarding the Payette Endowment Lands Strategy. Please consider those comments as you write your letter to IDL. And finally, I am in full support of a stakeholder advisory group that includes citizens to provide input on the development and uses of the McCall area endowment lands to the IDL.</p>
44	Melissa Coriell	1109 Buckboard Way, McCall, Idaho 83638	Sincerely,

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

		Melissa Coriell McCall
		<p>On December 15, 2020, the Idaho Department of Lands (IDL) released a draft report entitled, Payette Endowment Lands Strategy (PELS), which provides a plan for the management of 5500 acres of endowment lands in the vicinity of the City of McCall. As a retired family physician with extensive experience in public health, I have some serious concerns about the plan as written. While I understand the Constitutional Mandate to manage the Endowment Lands to maximize income for the beneficiaries, IDL also has a Trust Responsibility to protect the critical watershed that drains into Payette Lake so that the sole source of drinking water for McCall is not contaminated and to preserve the pristine beauty of the lake for future generations. Note the legal requirement stated in Public Law 67-4301 which was passed in 1925 states:</p> <p>“BIG PAYETTE LAKE — APPROPRIATION OF WATERS IN TRUST FOR PEOPLE. The governor is hereby authorized and directed to appropriate in trust for the people of the state of Idaho all the unappropriated water of Big Payette Lake, or so much thereof as may be necessary to preserve said lake in its present condition. The preservation of said water in said lake for scenic beauty, health and recreation purposes necessary and desirable for all the inhabitants of the state is hereby declared to be a beneficial use of such water.”</p> <p>PELS summarizes potential transitions of 13 parcels of land (Parcels A-M) but does not adequately address the critical need to protect the Payette Lake watershed. The narrative in the plan states that sewer services are available for most of the parcels and also states that the most probable buyer/tenant would be large-scale developers or private individuals. There is no mention of possibly adding Cougar (parcel M) and Shellworth (Parcel F) Islands, the Grove (Parcel G) which includes 3100 feet of shoreline, and the meanders north of Payette Lake (Parcel I) to Ponderosa State Park. These 4 parcels should definitely not be sold to developers or private individuals and if possible, should be transferred to management by Ponderosa State Park. Establishing conservation easements is another alternative that should be considered for a number of the parcels.</p> <p>I encourage the McCall City Council to do the following:</p> <ol style="list-style-type: none"> 1. Assess the capacity of the Payette Lakes Recreational Water & Sewer System to handle the additional sewage that will be created by the residences that are included in the draft plan, if the lands are sold to developers or private individuals. The sewer capacity needs to be determined in detail for each of the 13 parcels before any are sold. All housing and businesses built on these parcels must be
45	Thomas Welty, MD	939 Flynn Lane, McCall, ID 83638

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>connected to the sewer system to prevent contamination of Payette Lake.</p> <p>2. Promote the addition of Parcels M, F, G, and I to Ponderosa State Park which will then guarantee public access to them in perpetuity.</p> <p>3. Explore the feasibility of implementing conservation easements in as many of the other eight parcels as possible to preserve public access to those lands.</p> <p>4. Ask IDL to extend the moratorium on sale, trade, or lease of these lands until 2022 to provide enough time to develop a more comprehensive plan that puts the protection of Payette Lake and the watershed front and center as a foundation for its decisions.</p> <p>5. Ask IDL to develop a stakeholder advisory group that can provide input and support for potential changes to the lands in the PELS as a follow up to the focus groups that IDL has already organized.</p> <p>Thank you for your consideration of these recommendations and for the good work you are doing for McCall.</p>
46	William Marineau	3306 Shaggy Mane Ct	<p>I am a lifelong educator and fully understand the original purpose of the endowment lands to support education. This purpose has funded education over time with less financial gain for local districts. This is especially true in the McCall Donally area. This in part due to the closure of the local lumber mill in 1977-78. The local endowment lands have become a local gem with some welcomed logging but even more so with local open and available recreation areas.</p> <p>I strongly oppose the use of these lands for anything other than fully public use to recreation, indefinitely funding of schools and finding new ways to use these lands to find our schools.</p>
47	Leslie Pierce	405 N. Samson Trail, PO Box 3042, McCall, ID 83638	<p>I support preserving the public endowment lands around Payette Lake and the surrounding area and not selling them off to private sectors.</p> <p>I have been a homeowner in McCall since 1999 and pay property taxes to Valley County. I purchased my home after many years of visiting and enjoying McCall and the surrounding lakes, rivers, and mountains. I would like to continue enjoying the lands around Payette Lake, as well as my children, grandchildren and other family members.</p> <p>I oppose the trade that the Trident Holdings company has proposed for Payette Endowment Lands. This trade will mean the lands around Payette Lake will no longer be public and will no longer be ours to enjoy. I urge the Council to oppose the trade as well.</p> <p>I believe this trade will negatively affect most residents of McCall, of Idaho, and many visitors, who currently enjoy these lands. By moving access and putting the land in private hands, the ability to use the lake for fishing, boating, swimming and the land for hiking and biking will be greatly reduced. These areas are also used for</p>

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

gathering wood, huckleberries, and more. Thinking about Payette Endowment Lands no longer being available breaks my heart. This would be a huge loss for the community of McCall and its visitors and would only benefit a select few.

Development occurring on these lands will affect the ecosystem, including the land, the water and animals. Wildlife corridors will be negatively impacted, habitat reduced, and our natural lake will be turned into a private neighborhood. It is true that the south part of the lake borders the town of McCall and many residences. These lands are the part of the lake that allow us to "get away." That will not be possible should it be developed.

Payette Lake, being the sole source of water for McCall, will be impacted. The northern part of the lake, including the meanders, provides a buffer and keeps the lake healthy. Developing those areas will degrade the water quality. We enjoy some of the best water in the world at the turn of our faucets. This is important for the health of the ecosystem, plants and animals, but also, our own health.

I understand that the Idaho Department of Lands (IDL) is taking time to do what is right for the state, and I hope they listen to residents of McCall who will be directly impacted. I encourage you to tell the IDL to include a Stakeholder Advisory Group in their Payette Endowment Strategy Plan. This will enhance transparency and access for local residents as they will be able to voice their concerns and provide details about real local impacts expected by this or future exchanges. Local residents can also assist in finding solutions for the IDL to seek other methods of needed revenue while keeping these lands in the public trust. I encourage you to tell the IDL to conduct an economic analysis which would bring to light the magnitude of the many negative impacts to the community of McCall that may not have been thought about yet. Within that economic analysis, the environmental concerns (see above) should be addressed as well as the loss of this public land and its value to McCall and the many annual visitors. My guess is that many residents would not be able to put a price on this land, as it is indeed priceless.

Finally, I urge you to keep these lands in the public domain because of their importance to residents of Idaho, especially those living in McCall, and the many visitors that come here every year. Many residents of McCall make their living tied to the visitors that come here and enjoy these lands. How many people would stop coming here if the Payette Endowment Lands were no longer public but were private? A few would pay to use the developed area, while the rest of us, both residents and visitors, would be locked out. Please help to keep these lands available to all, and not just a few of the wealthy.

Thank you for taking the time to consider my concerns.

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

48	Robin Gilman	244 Columbus Canyon Road Grand Junction CO 81507	I have been blessed to have spent over 60 summers in McCall during which time, significant growth has occurred. With this growth, the burden on the land and water is extracting a toll. Aquatic life is stressed as water, air and noise pollution increase. We must find ways to preserve the gifts the forest, lakes, mountains and rivers give to all of us to help us de-stress, find balance and peace. The mandate to make money for education is important but preserving nature for our children also offers opportunities to nurture their physical, emotional, mental and spiritual well-being, the benefits of which far out-weigh the temporary monetary gain.
49	Teresa Cohn	300 May Rd.	Thank you for addressing the future of the extensive endowment lands and the role they play in our community. Please place Payette Lake, and all critical waterways, at the center of all decision making. The health of our waters is closely tied to the health of our community. Water quality, and the health of our watershed, should be of critical concern. Development around the lake should be prevented and fragmentation of lands avoided.
			January 28, 2021
			McCall City Council Members,
			The Payette Endowment Lands Strategy should be based on a comprehensive analysis of the McCall area endowment lands as a whole and over the long term. A comprehensive approach whereby all relevant factors are included in the analysis of alternatives and the cumulative effects of parcel by parcel decision making should be used. A broad set of goals should be developed for land preservation, uses, and development.
			Trading or selling these endowment lands and dividing them up into pieces, would sacrifice their long-term value: as an intact ecosystem, as a buffer for the watershed, as a crucial wildlife corridor, as a wildfire barrier, as a refuge for plant and animal diversity, and as a source of resilience insurance in climate chaos.
			Much of the value of these lands derives from them being contiguous and positioned between and adjacent to the lake on one side and the national forest and state park on the other. If the land around the lake is divided, it would cease to provide the potential for long-term value as a source of revenue for beneficiaries from recreation and conservation leases and easements and revenue from potential transfer or sale to the state park or national forest system.
50	Jeff Canfield	1102 Buckboard Way, McCall ID 83638	Please encourage IDL to work with a stakeholder advisory committee to fully explore creative solutions that will yield revenues

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>from the endowment lands, which honor the health of the lands, waters, and ecosystem. Ask them to evaluate legacy programs such as logging, grazing, and mining while analyzing new methods of deriving revenues that are consistent with the 21st century, including the warming climate, increasing fires and blights in our forests, population growth, and the growing scarcity of undeveloped land.</p> <p>Thank you for your time and attention.</p> <p>Jeff Canfield, McCall</p>
51	wyatt albright	3731 West Mountain Rd	<p>I believe a transfer of this kind would negatively impact our local lands for public use and ecological system. We need to think about our future and our future generations when deciding on these things we need to leave them with a place to escape to. Allow them to enjoy what we have and our families before us have gotten to enjoy. A true undisturbed forest for recreation.</p> <p>Allowing a large company to come in privatize and develop the land would suck, For everyone except the people to aim to get rich off of it.</p> <p>Please keep it just the way it is.</p>
52	LYNNE HODGES	1406 Club Hill Blvd, McCall	<p>I stridently oppose the sale of endowment lands, particularly for short-sighted gains, because the land should be preserved for public use, land preservation, future generations, and in funding public schools.</p>
53	Jeff and AJ Mousseau	105 Brundage View Ct, POB 167, McCall, ID, 83638	<p>The city of McCall should advocate that the Payette Endowment Lands Strategy "the Plan" be based on a comprehensive analysis of the McCall area endowment lands as a whole, be evaluated over the long-term, and be consistent with planning laid out in the McCall Comprehensive Plan. Once plans are approved and in place, IDL and the Land Board should support the creation of a standing stakeholder advisory group that includes a City of McCall representative to provide input to IDL in decision-making regarding the McCall area endowment lands parcels following approval of the Plan. Decisions on a parcel by parcel basis should not be made without public input. In addition, land trade or sale offers not within the Plan should not be considered.</p> <p>Trading or selling the endowment lands and dividing them up into pieces sacrifices their long-term value as an intact ecosystem, as a buffer for the watershed, as a crucial wildlife corridor, as a wildfire barrier, and as a as a refuge for plant and animal diversity. In terms of recreational access, imagine riding your mountain bike from one parcel to the next with restrictions at the boundaries, as well as losing access to the Payette National Forest. Solutions such as conservation/recreation leases and easements can be used to meet</p>

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

			<p>revenue goals for these lands and afford IDL the opportunity to retain the lands as an asset while stacking together revenue bearing leases and easements.</p> <p>The Plan should be protective of the public trust, that is the obligations that elected officials have to protect and maintain resources, specifically bodies of water such as Payette Lake. Payette Lake is the sole source of drinking water for the City of McCall, and further contaminating these waters by more development would be big problem for our City. In addition to this, consideration must be given to the limited capacity of the sewage system, which we have already seen.</p> <p>The Land Board should consider a constitutional change to the Idaho constitution that would expand and clarify the importance of the environment stewardship associated with these lands. Several other western states have made such changes including Colorado whose constitution states: Article IX, Section 10 -.... and (c) that the economic productivity of all lands held in public trust is dependent on sound stewardship, including protecting and enhancing the beauty, natural values, open space and wildlife habitat thereof, for this and future generations.</p> <p>Lastly, trading the McCall area endowment lands likely worth more than \$1 billion for northern Idaho timber lands worth around \$45 million would represent a complete neglect of the Land Board's fiduciary duties, be a violation of the Idaho constitution to secure the maximum long term financial return to the education trust institutions and fund, and be an enormous loss to Idaho education. To us, it is unthinkable to trade these McCall area lands away fully opening them to the greed of development, where only the wealthy will have the privilege of use, and the children of Idaho are included in the losers.</p> <p>Jeff and AJ Mousseau, McCall</p>
54	<p>Toni Slaymaker</p>	<p>1635 Lakeridge Drive, McCall, ID 83638</p>	<p>I am writing to reaffirm my opposition to the Trident Holdings proposal which would place State Endowment lands in bulk to private interests. In the City Council's response to the Idaho Department of Lands it is imperative to stress that a long range stakeholder advisory group is formed to represent our citizens. An independent analysis of how our Endowment Lands impact the quality of life and the health and direction of the local and State economy, ecology, the Payette Lake watershed and wildlife should also be developed by all stakeholders to provide sound stewardship of these critical resources.</p>

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

Thank you for the opportunity to comment and for your service to our community.

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

A new submission has been received for Report a Compliment or Service Concern at 01/27/2021 8:56 PM

First Name: Michelle

Last Name: Blank

Email Address: michelleblank@mac.com

Phone: 208-340-7501

Address: 744 Deer Forest

City: McCall

State/Province: ID

Zip Code: 83638

Describe Your Concern: Dear City Council Members, Thank you for engaging with the Idaho Department of Lands on their Payette Lake Endowment Land Proposal. I hope that as you consider the appropriate input from the city, you will prioritize the health of Payette Lake, as the source of our drinking water, above all else. The Endowment land's located next to the lake should be left undeveloped as the degradation of our drinking supply presents a public health issue. It would be remiss to prematurely develop these lands, especially given the unknown impacts of climate change on a water source so critical to our small town and others reliant on the watershed. The land board has a public trust responsibility for water quality. Parcelling up lots along Payette Lake is sure to not only undermine water quality, but also the public trust to protect resources for all citizens of Idaho. Please remind the Idaho Department of Lands of their public trust responsibilities that are just as important as their fiduciary responsibilities. Demand that the lands adjacent to the lake remain undeveloped. This will not only preserve important wildlife habitat and recreation access, but it will help preserve the quality of the Payette Lakes Watershed. Thank you! Michelle Blank

ATTACHMENT 1

Public Comments regarding IDL Endowment Land Management Plan for McCall
Area - January 28, 2021 Council Meeting

January 23, 2021

Re: Payette Endowment Lands Strategy Plan

Dear City Council and Staff,

Thank you for the opportunity to comment on the issue of the McCall Area Endowment Lands.

Idaho Department of Lands prepared a Payette Endowment Lands Strategy, (PELS), in an effort to better manage the Impact Area Lands for the future and presented this plan to the Land Board in December 2020.

My comments are made with a full understanding of the State's obligations to the trust.... according to Article IX, section 8 of the Idaho Constitution, the state must consider ONLY their "epitomic public trustee responsibilities", i.e. their fiduciary responsibilities to the beneficiaries.

What a conflict this creates when it comes to working with communities and working with the challenges that are presented by the 21st century! The way "business" has been done is rapidly changing – and other western states are facing these same pressures from the energy sector, to the economy, not to mention challenges brought forward due to climate chaos.

I encourage the City to maintain dialogue with IDL, County Commissioners, the Sewer District, and other stakeholders to follow the Comprehensive Plans established by the City and Valley County.

Paramount in these efforts, we must preserve the water resources – Payette Lake and the streams that flow into it. This lake is the City's drinking water source. The Lake is only 7.9 square miles and there is a carrying capacity for development and growth which requires further study and real data.

These are a few of my concerns with the IDL Plan:

1. Provide a comprehensive plan – consider the value of keeping these contiguous lands as valued assets that if they are fragmented will threaten the health of the ecosystem we live in and damage our watershed.
2. Ask IDL to maintain a long-range Focus Group with locals who know the land best to help minimize conflict, foster creative solutions to help with revenue generation as well as garner widespread support from the general public.
3. Encourage a thorough economic analysis of costs as well as benefits with relation to transactions of endowment lands.

Sincerely,

Debbie Fereday, 315 Burns Rd. McCall , ID

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:15 PM
To: Comments
Subject: Comment Submitted

From: Kathleen Runyan at kat.runyan@yahoo.com
Phone: 4065992924
Address: 606 Brookdale Dr
City: Boise
State: Idaho
Zip Code: 83712

Comment:
Hello Idaho Land Board,

I ask the board to develop a Conservation Easement Option when determining how to manage state lands and that you extend the moratorium to allow sufficient time to develop this option. When land is purchased at fair market value and put into a conservation easement this will generate revenue for the endowment through encouraging recreation uses and wildlife opportunities that bring money and people into these neighboring communities. The value of recreation is increasing exponentially in the Western states and should be factored into the decision process when determining what is the best use of land. The state should complete a study to determine the economic impacts from recreation on other nearby states including: Oregon, Washington, Montana, Wyoming, Utah, Colorado etc.. A properly developed model (this will have to be completed at some point) for McCall will benefit other communities across the State as well, to accurately monetize the impact recreational opportunities have on surrounding towns and the State of Idaho. Lastly, conservation easements can also be written to allow for traditional uses, such as timber and grazing, thus keeping the land in the Endowment portfolio and allowing for continued revenue.

Sincerely,

Kat Runyan

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:19 PM
To: Comments
Subject: Comment Submitted

From: Rosemary McClenahan at
City: Boise
State: Idaho

Comment:
The value of the McCall property will increase over time which is a return on investment. Selling it to a developer will result in an initial gain at the cost of future value. It is important to maintain the property in McCall that provides access to Idaho citizens and tourists. Once it is sold and developed it cannot be reclaimed for Idahoans.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:25 PM
To: Comments
Subject: Comment Submitted

From: Mary Faurot Petterson at maryfaurot@gmail.com
Phone: 2086303230
Address: PO Box 2641
City: McCall
State: Idaho
Zip Code: 83638

Comment:
Payette Endowment Lands Strategy Comments
March 1 2021

Thank you for the opportunity to comment on on the IDL Payette Endowment Lands Strategy. My family and I have lived in McCall since 1993. We have been regular users of these Lands in all seasons for hiking, biking, trail running, mushrooming, birdwatching, wooding, berry picking, fishing, hunting, camping, skiing, snowshoeing, boating, swimming, and gatherings. We cherish these lands and their access. These activities represent a nonconsumptive way of life that is integral to our family and has huge value. This is common to much of the community and the area surrounding these Lands, and it is what our valuable ecotourism patrons seek. The ecological health of these Lands have high value to McCall, Idaho, and all who visit, spiritually and economically.

I have worked as an ecologist, biologist, and land manager for public lands and am knowledgeable of the effects of development on natural ecosystems. A fairly intact ecosystem supports the Payette Endowment Lands, which relies on their undeveloped nature. The best intentioned development cannot avoid impact on clean water, wildlife corridors, altered hydrology, solitude, fire regimes, and landscapes in general.

1. It is imperative that input from the local community is used to manage these lands for the values and ecosystem services listed above.
2. IDL must take a long-term conservation approach to when managing these ecologically vital Endowment Lands. Without a conservation approach, their long-term comprehensive value will diminish and be lost in spite of a short term financial gain.
- 3.IDL must Strongly include conservation easements when managing the Lands.
4. Instead of a financial plan, IDL should provide a comprehensive management plan for retaining the value of undeveloped lands and natural ecosystems.
5. IDL needs to work with stakeholders to explore revenues from these Lands which honor the health of the ecosystem.

My family and I also stand with the Payette Endowment Lands Alliance in preserving State ownership, protecting the health of Payette Lake, and providing public access.

Thank you for considering these comments.

Mary Faurot Petterson
Maryfaurot@gmail.com
208-630-3230
302 Mather Road #C5
McCall, ID 83638

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:27 PM
To: Comments
Subject: Comment Submitted

From: Wayne Ruemmele at wayne@cimbarides.org
Phone: 2086346718
Address: PO BOX 744
City: McCALL
State: Idaho
Zip Code: 83638

Comment:

Dear Land Board,

Continued public access to Endowment Lands around Payette Lake and Valley county are extremely important for mountain biking and outdoor recreation in general. Many popular trails access the Payette National Forest through IDL lands first. We believe there is an economically viable solution to meet the IDL's constitutional mandate while maintaining public access.

Recreational leases- CIMBA currently holds a recreational lease for the current Payette Lake Trail corridor. CIMBA realized several years ago that trail access needed to be preserved and was proactive by working with the IDL to lease the trail corridors. Recently we have been working with the local IDL office to expand that lease. We believe this is a workable income-generating model to support sustainable trail development, works with IDL's timber harvesting and management, and can be used on the parcels mentioned above.

Conservation Easements – the utilization of conservation easements to protect CIMBA's interest in long-term investment in trail projects. Trail development is resource intensive, and it is imperative that we can ensure land we choose to build trails on is appropriately protected for generations to come.

Additional Time – We are a small, all-volunteer non-profit and request more time to work with other stakeholders for viable economic options. An extension of the moratorium of new leases would benefit this process. There are many creative solutions being generated by our community and it will take additional time to put them together.

Endowment land is a major contributor to the area's economy and tax base. It may be difficult to quantify but sell it off and see how quickly tourism will fall off and businesses will fail.

Thank you,

Wayne Ruemmele

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:30 PM
To: Comments
Subject: Comment Submitted

From: Chris Williams at youda97@yahoo.com
Phone: (208) 283-7151
Address: 4476 n Girasolo Ave
City: Meridian
State: Idaho
Zip Code: 83646

Comment:
Please Denise this. Let's keep it owned by the state. I see no be ifit to swapping/selling.

From: m hays <haysmkc@gmail.com>
Sent: Monday, March 1, 2021 3:33 PM
To: Comments
Cc: bwoolf@sco.idaho.gov; lawrence.wasden@ag.idaho.gov; sybarra@sde.idaho.gov; Scott Corkill; ldenney@sos.idaho.gov; governor@gov.idaho.gov; Dustin Miller
Subject: Payette Endowment Lands

Dear Land Board Members and IDL officials,

As the Department prepares the McCall Plan they must look outside IDL also to evaluate alternatives including land and resource management options. Neighboring States have addressed ways to fund beneficiaries while retaining the Lands the States received from the Federal Government at Statehood. The Department needs to slow down! The Land Board's job is to maximize LONG TERM financial return. There is no point in liquidating land that is rapidly appreciating in value. Idahoans have owned this land since statehood. There is absolutely NO RUSH to do anything right away. In March of 2020 Bruce M Smith in a letter to the IDL Board said, ' The Land Board needs to make certain its information is timely, and that its actions comply with constitutional and statutory obligations before even considering selling these lands. Each member of the Land Board needs to fully understand and grasp their individual obligations. As seen in the recent undertakings regarding Lease 500031 in McCall, mixing constitutional questions and political considerations creates a toxic brew.' He is now suing the State for \$2.5 million. More lawsuits will follow across the State if IDL continues an arbitrary process of mixing constitutional questions and political considerations.

For the State to look out for the best interests of their citizens and beneficiaries the Land Board must look to the future not the past. The future recreational draw of the area would be negatively affected if the State does not act to preserve the environment that makes this area special. Trident's proposals and lobbying for State land around McCall has generated increasing Public opposition to privatizing State Lands around McCall and elsewhere in the State.

An Opinion from 2018 by the Idaho AG (2018/04/OP91-03) says about State Lands, "[I]t shall be the duty of the state board of land commissioners to determine the best use or uses, viewed from the standpoint of general welfare". The best use or uses of this property viewed from the standpoint of General Welfare has been laid out in the City and County Comprehensive Plans.

Several years ago as the Idaho Land Board looked at the Tamarack Lease, 2,100 acres of state-owned land the ski area is built on, IDL acknowledged the lease represents one of the state's more lucrative deals. Patrick Hodges of the Idaho Department of Lands said the state has an interest in seeing a successful resort. For Tamarack and all the businesses that have been built upon the area's natural resources to be successful the natural resources of the area need to be protected. Toxic algae blooms in Cascade Reservoir for the past three years threaten the resort's plans for a marina and long term success.

Continued development in the Payette River Basin threatens not only Cascade Reservoir but the NF of the River and Payette Lake.

In February 2021 Governor Little said, "There is nothing more essential to our health and way of life – or Idaho's future – than clean, plentiful water. The availability of water has transformed much of our state from a desert into an abundant agricultural landscape that supports tens of thousands of Idahoans and their livelihoods.

Across Idaho, water is the building block for careers and prosperity.

How we manage – or mismanage – our water resources determines our success or failure as a state."

In 1997, New York City embarked on a monumental plan to buy thousands of upstate acres, shield its reservoirs from pollution, improve treatment plants and septic systems and subsidize environmentally-sound economic development.

Preserving the watershed was estimated at just over a dime invested on ecological preservation for every dollar that would have been spent on a filtration plant. The watershed agreement boosted the upstate economy, with money pouring in. It provided employment, invested in local businesses and promoted ecotourism.

To manage our water resources and determine our success or failure as a state IDL should preserve the watershed around Payette Lake and River and across the State. There is no need to buy the upper Payette Lake watershed, it is already publicly owned. The watershed is essential to our health and way of life. It provides employment, supports local businesses, and the recreation tourism around McCall and in our public lands is a huge economic boon for the State. Selling it to developers and degrading the clean, plentiful water threatens Idaho's future.

Looking to the past includes the IDL strategic plan to grow the O&G industry. Many States with large areas of current oil and gas leases are trying to deal with the rapid growth of bankruptcies in the O&G industry. A recent article in Reuters says there are more than 3.2 million abandoned oil and gas wells in the U.S. Nationwide, the number of documented abandoned wells has jumped by more than 12% since 2008, around the start of the hydraulic fracturing boom, according to EPA estimates. Experts believe the number will keep growing. Oil-and-gas firm bankruptcies in the United States and Canada rose 50% to 42 in 2019, and analysts say the rate is likely to accelerate as the pandemic-related slide in energy prices shakes out producers. Research firm Rystad Energy estimates that about 73 U.S. drilling companies could go bankrupt this year, with an additional 170 succumbing in 2021, assuming an average oil price of \$30 a barrel. Who pays for the cleanup after the companies take the profits then declare bankruptcy?

The Public pays. The American Petroleum Institute spent \$1.44 million in the first quarter of 2020 lobbying on Capitol Hill, with oil well bonding legislation one of the target issues. "States and the federal government have many sources of funding available to reclaim and plug abandoned wells," said Reid Porter, a spokesman for the American Petroleum Institute.

Idaho has already disposed of over 40% of the public land it received at Statehood. Can IDL and the Land Board say that the Idaho beneficiaries and Public are better off after past land disposal. In the future will Idaho beneficiaries and Public be able to look back and say current proposed land disposals were to their benefit. Once the State disposes of Land it has removed any options for future trustees consideration.

The Public does not want to see the State dispose of or degrade the Lands and water resources around McCall.

Mike Hays
McCall ID

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:33 PM
To: Comments
Subject: Comment Submitted

From: Jim Pfof at jimbarb123@comcast.net
Phone: 850-294-9292
Address: PO Box 202
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Why would the Land Board even consider a land swap. The 20,00 acres around McCall has to be very much more valuable than some timber land in north Idaho. If the land around McCall must be put on the block, why not sell it in small parcels. Money would be had up front over a long period of time.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:39 PM
To: Comments
Subject: Comment Submitted

From: Alyssa Camacho at lyssayvonne@gmail.com
Phone: 2089369549
Address: 8127 E Ravalli Ct
City: Nampa
State: Idaho
Zip Code: 83687

Comment:

Don't sale the land!

We as local, born and raised Idahoans don't want to see our state turned into a commercialized tourist place like other surrounding states!

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:41 PM
To: Comments
Subject: Comment Submitted

From: Mateo Cerda at
City: Nampa
State: Idaho
Zip Code: 83687

Comment:
Do NOT sell the land to the rich.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:42 PM
To: Comments
Subject: Comment Submitted

From: Apollo Martinez at apollom87@icloud.com
Phone: 2084881458
Address: 16837 N Wessex Ln
City: Nampa
State: Idaho
Zip Code: 83687

Comment:
Do not sell any land two developers. Idaho land is meant for Idaho natives and their children

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:45 PM
To: Comments
Subject: Comment Submitted

From: Andrea Lamberty at andrealamberty@yahoo.com
Phone: 2089829128
Address: 16837 N Wessex Ln
City: Nampa
State: Idaho
Zip Code: 83687

Comment:
Keep land local

From: Garret Visser <gvisser@idahowildlife.org>
Sent: Monday, March 1, 2021 3:45 PM
To: Comments
Cc: Scott Corkill; Sid Anderson
Subject: Payette Endowment Lands Strategy Comment Submission
Attachments: Payette Endowment Strategy Draft_GV-2.pdf

Hello,

Attached are comments on the Payette Endowment Lands Strategy submitted by Idaho Wildlife Federation, Theodore Roosevelt Conservation Partnership, Trout Unlimited, Backcountry Hunters & Anglers, Idaho State Bowhunters, Idaho Deer Alliance, and Idaho Brittany Club.

If you have any questions, please contact me at my information below.

Thank you,

Garret Visser
Conservation Program Coordinator
Idaho Wildlife Federation
(843)513-5380
gvisser@idahowildlife.org



Idaho Department of Lands
300 N. 6th Street, Suite 103
Boise, Idaho 83702

RE: Idaho Wildlife Federation Comments on Payette Endowment Land Strategy

Dear Idaho Department of Lands,

Idaho Wildlife Federation, the Theodore Roosevelt Conservation Partnership, Trout Unlimited, Backcountry Hunters & Anglers, Idaho Deer Alliance, Idaho State Bowhunters, and Idaho Brittany Club write to thank the Idaho Department of Lands (IDL, or, Department) for the opportunity to comment on the Payette Endowment Land Strategy (Strategy, or, Plan).

IWF is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations with 45,000 affiliate members and individual supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management. Many of our members live near and recreate on endowment lands within McCall's Area of Impact and have shown substantial interest exploring strategies to conserve this area while still meeting the fiduciary obligations to the various trustees.

The TRCP is a national non-profit conservation organization working to guarantee all Americans quality places to hunt and fish. In addition to its 60 formal partner groups, the TRCP represents more than 100,000 individual members across the United States and 3,500 in Idaho. In cooperation with other sporting and conservation organizations, we work with willing partners to ensure access to public lands while also working through federal land use planning to make sure big game animals – such as deer, elk, bighorn sheep, and pronghorn – have room to thrive.

Trout Unlimited (TU) is the nation's oldest and largest non-profit coldwater conservation organization with over 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU staff and volunteers have worked toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges. Nine chapters with 2,500 members statewide actively engage with state agencies, local communities, and private landowners in order to maintain the larger landscape that is so vital to the social and economic well-being of communities in Idaho.

Backcountry Hunters and Anglers (BHA) is a non-profit conservation group with 40,000 members in chapters across 48 states, two Canadian provinces and one territory. BHA seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting, through education and work on behalf of wild public lands and waters. The Idaho chapter has over 2,000 dedicated public landowners as members.

The Idaho Deer Alliance is dedicated to the conservation and management efforts of Idaho's deer habitat and populations. IDL is committed to being engaged in productive partnerships for those that want to see Idaho deer herds sustainable for future generations.

The Idaho State Bowhunters is a non-profit organization of sportsmen and women, and affiliated bowhunting clubs dedicated to protect and improve Idaho's wildlife heritage of bowhunting for present and future generations

The Idaho Brittany Club promotes cooperation and friendship among owners, breeders and others interested in the improvement of the breed. The club encourages higher standards in breeding, training and showing, both in the field and in the show ring, and members strive to keep the Brittany forever a Dual Dog.”

Endowment lands provide a unique and challenging situation across Idaho and the Western United States. Too often the spotlight is put on federally managed lands without fully realizing the conservation and wildlife value that many state endowment lands have and contribute to the health and function of the overall landscape. However, we believe that the Department recognizes these knowledge gaps with the public and has worked to highlight the importance of these lands and the role they play for all Idahoans. We greatly appreciate the conversations we have had with IDL staff throughout the development of the Plan as we work to determine the future for these 5,478 acres. With that, our groups would like to provide comments and suggestions on the Plan below.

Consider Conservation Easements or Similar Conservation Measures for Revenue Generation

The Plan acknowledges that endowment lands located adjacent to or in close proximity to urban development such as McCall's Area of Impact, present challenges in achieving maximum revenue generation due to limitations on or opposition of certain uses. We believe that strategic conservation easements would generate new sources of revenue for IDL to keep certain parcels

within the management portfolio. With conservation easements secured and revenue generated from a fair market value sale, the Department may still allow for timber management and grazing with the ability to conform to the adjacent challenges.

Strategic conservation easements open the window of opportunity for diversified funding mechanisms that may close or surpass the revenue gap that currently exists. As an example- If non-development easements were secured and the open space that exists today is conserved, stakeholders can work to develop additional revenue from the recreation industry.

Our organizations believe there are several parcels under the Tier III and IV Transition Lands are worthy candidates for conservation easements and would fit the management outlook in the Plan.

These parcels are:

- **Parcel E** (Eastside Drive), \pm 160 acres, Tier III
- **Parcel G** (East Shoreline), \pm 21 acres, Tier III
- **Parcel H** (East of Eastside Drive to Tip), \pm 1040 acres, Tier IV
- **Parcel I** (Tip), \pm 2040 acres, Tier IV
- **Parcel J** (Northwest Warren Wagon), \pm 380 acres, Tier IV

These parcels are of highest value and concern for our organization due to their large, contiguous sections of undeveloped land as well as the access they provide to additional lands beyond McCall's Area of Impact. These large parcels provide a safe corridor for migration of various big game species from adjacent National Forest lands down to winter habitat as well as wetland habitat that contributes to overall Payette Lake ecosystem health. We believe there is additional value of maintaining these contiguous parcels for access for the ease of administrative purposes such as timber extraction, wildfire prevention, or other maintenance needs.

The development of conservation easements may also enable lands to qualify for additional, new sources of revenue generation through emerging ecosystem service markets. In addition to the fair market value sale for conservation easements, these parcels may qualify for private or federally funded mitigation credits. The revenue potential for some of the larger parcels, such as those identified in Tiers III and IV, may be greater than expected if conservation easements are developed that include ecosystem services valuations¹. We encourage the Department to explore these innovative ecosystem markets such as payment for ecosystem services (PES) or payment for watershed services (PWS). Parcels H and I, for example, may be eligible for these markets due to their acreage and wetland habitats. The North Fork of the Payette, which cuts through Parcel I, has contributed as much as 73% of Payette Lake's inflow and plays a major role in nutrient load and water residence time to the Lake²

Our groups ask that IDL defers to local constituents on guidance on Tier I and II transition parcels. We believe that residents of McCall and Valley County could play a pivotal role in determining the best use and ownership of these parcels for the future.

¹ Culp, S. Marlow, J. Conserving State Trust Lands, Strategies for the Intermountain West. Lincoln Institute of Land Policy p.19.

² Woods, P.F. Eutrophication Potential of Payette Lake, Idaho. 1997. U.S. Geological Survey. Water-Resources Investigations Report 97-4145.

Explore New Asset Classes on Appropriate Endowment Lands

We encourage the Department to explore new asset classes on appropriate endowment lands and include them in the Plan. Examples of potential asset classes are Recreation and Watershed Protection, consistent with language from Idaho Code 58-133: "...lands chiefly valuable for forestry, reforestation, recreation, and watershed protection." We believe that conservation easements and recreational leases, when combined with timber and grazing, can provide sustainable returns that are less dependent on fluctuating market conditions. Without exploring these new asset classes, the Department may be leaving money on the table that is valuable to the beneficiary.

Extend Moratorium on Sales and Leases to Develop Protocol

Our organizations believe it is appropriate to extend the moratorium on lease sales within McCall's Area of Impact to allow further community discussions to form with the Department as well as amongst other interested parties.

There is great desire by local non-governmental agencies (NGOs) and 501(c)(3) organizations to help narrow the revenue gap by offering funding mechanisms and strategies that involve perpetual conservation easements. The City of McCall and Valley County have also explored offerings to help retain state ownership and continue to have these conversations. However, the only eligible holders of conservation easements on endowment lands in Idaho are government agencies and charitable trusts³. If there is an opportunity to expand the base of eligible holders of conservation easements to these interests, we believe it would benefit the state by creating a locally driven process that would diversify the revenue stream and narrow revenue gaps. An extended moratorium would allow IDL the opportunity to define or establish a set of protocols for determining eligible holders for conservation easements on endowment lands.

We also believe there is time available to allow IDL to clarify if it sees public trust responsibilities by the state on the endowment lands in focus with respect to Payette Lake and the North Fork Payette River. While primarily a state doctrine, there are federally imposed limits on state discretion over navigable badlands that the states acquired pursuant to the equal footing doctrine. The state must ensure that the public's interest in these lands is not substantially impaired⁴.

Acknowledge Precedent with Strategy

It is apparent that this Plan, as well as a separate proposal that encompasses endowment lands within McCall's Area of Impact, has pushed discussions of the future for endowment lands into the forefront. We urge IDL to acknowledge the precedent that this Plan can have on endowment lands in all other corners of the state. This Plan may set the stage for the future of all 2.5 million

³ See note 1. p.21.

⁴ Blumm, M.C. Dunning, H.C. Reed, S.W. Renouncing the Public Trust Doctrine: As Assessment of the Validity of Idaho House Bill 794. 1997. Ecology Law Quarterly.

acres of endowment land- from timber land in Bonner County, to those that overlook famed steelhead runs on the Clearwater River near Orofino, to the desert lands of Owyhee County. With this precedent, IDL and the Board of Land Commissioners should take the time to explore “conservation-based” alternatives that keep lands in IDL’s portfolio. Conservation easements or leases can maintain public access, clean water and fish and wildlife habitat, while providing long-term revenue to beneficiaries through traditional resource extraction practices. Communities close to endowment land will likely look to this in the future as reference. We need the Payette Endowment Strategy to be a properly developed model, not only for this, but all Idaho communities.

Conclusion

To simplify, our organizations urge IDL to slow this process down. We ask for an extension on the moratorium until there is a sufficient study on the possibilities of new asset classes and on the use of perpetual conservation easements as a financial tool. Constitutional mandates speak to the return to the beneficiary, not specifically on the revenues generated on individual parcels. There should not be any rush to address these transitional lands identified in the Plan because constitutional mandates do not speak on revenue gaps, only maximum long-term returns.

Thank you for the opportunity to comment. We look forward to additional opportunities to work with the Department as well as the Board of Land Commissioners.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:52 PM
To: Comments
Subject: Comment Submitted

From: Stephen Penny at
City: McCall
State: Idaho
Zip Code: 83638

Comment:
Dear Idaho Land Board,

Thank you for giving the future of the McCall area the careful thought process it deserves in regard to managing, trading or selling of the great asset that are the area endowment lands. As you probably know, the vast majority of the residents of the area would like to see the parcels targeted for disposal be preserved as open space for recreational access. To this end, I would like to see the Land Board pursue every possible avenue to acquiring the funds to reimburse the endowment funds so the lands can remain in public access. This is especially true for the lake access and land near Payette Lake/Ponderosa Park and the area accessed from Warren Wagon Road. Once the lands are disposed, it will be a permanent legacy of this Land Board and I would urge you to look at how the values of the citizens of the state have changed from the acquiring of the endowment lands a just a little over a hundred years ago to this day. Surely the need for public access will only increase in the future. These parcels also provide needed wildlife habitat as development continues to encroach and fragment the habitat in the area.

The State of Idaho currently has a budget surplus. I would suspect that most of the citizens of the state would support using some of that for a fund that could reimburse the Endowments for the cost of preserving the land around McCall and across the State. Can the Land and Water Conservation fund also be used for this purpose? I would like to see the Land Board give this enough time for concerned citizens to supplement these sources and/or come up with creative ideas to preserve the land while meeting the needs of the endowments.

From: Ryan Montoya
Sent: Monday, March 1, 2021 5:56 PM
To: Sid Anderson; Renee Jacobsen
Subject: Fwd: City of McCall - Technical Review
Attachments: Payette-Endowment-Land-Strategy-DRAFT-121520-rev-020921.pdf

From: Michelle Groenevelt <mgroenevelt@mccall.id.us>
Sent: Monday, March 1, 2021 3:53:59 PM
To: Ryan Montoya <rmontoya@idl.idaho.gov>; Scott Corkill <scorkill@idl.idaho.gov>
Cc: Dustin Miller <dmiller@idl.idaho.gov>; Anette Spickard <aspickard@mccall.id.us>
Subject: City of McCall - Technical Review

Hello IDL Staff,

Since this review is more of a technical in nature, we wanted to email it to you with review comments and edits.

To summarize, there are some errors related to zoning and land uses in the Parcel sections. I tried to highlight and clarify the jurisdiction of the McCall Area. Also, you might check the Sewer density map which may be more restrictive than the City's zoning densities and ultimately impacts projected values. I am happy to provide any clarification or additional information as needed. Also, let us know if you need assistance with maps and our GIS Professionals are happy to help.

Thanks for the opportunity to comment.

Michelle Groenevelt, AICP
Community & Economic Dev. Director
216 E. Park Street | McCall | Idaho 83638
Direct: 208.634.5229



From: Ryan Montoya <rmontoya@idl.idaho.gov>
Sent: Wednesday, February 5, 2020 8:53 AM
To: Nathan Stewart <nstewart@mccall.id.us>
Cc: Scott Corkill <scorkill@idl.idaho.gov>; Michelle Groenevelt <mgroenevelt@mccall.id.us>; Morgan Bessaw <mbessaw@mccall.id.us>; Anette Spickard <aspickard@mccall.id.us>; Sid Anderson <asanderson@idl.idaho.gov>; Neil Crescenti <ncrescenti@idl.idaho.gov>
Subject: RE: White Pine - Shady Lane

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Thanks, Nathan. Would any of the following days work: 2/20, 2/25, 2/26, 2/27?

Ryan

From: Nathan Stewart <nstewart@mccall.id.us>
Sent: Monday, January 27, 2020 5:33 PM
To: Ryan Montoya <rmontoya@idl.idaho.gov>
Cc: Scott Corkill <scorkill@idl.idaho.gov>; Josh Purkiss <jpurkiss@idl.idaho.gov>; Zane Lathim <zlathim@idl.idaho.gov>; Michelle Groenevelt <mgroenevelt@mccall.id.us>; Morgan Bessaw <mbessaw@mccall.id.us>; Anette Spickard <aspickard@mccall.id.us>
Subject: RE: White Pine - Shady Lane

Thanks for the update Ryan,

We should likely schedule a meeting to go thru the annexation process with our Community Development staff and other details. The goal would be to establish a timeline for this project and roles/responsibilities. Let me know when you're ready to get together and I'll check with City staff.

Best regards,

Nathan T. Stewart, P.E.
McCall Public Works Director
216 E. Park Street, McCall, ID 83638
Ph.: 208-634-8943 | Cell: 208-315-3304 | Fax: 208-634-4170

From: Ryan Montoya <rmontoya@idl.idaho.gov>
Sent: Monday, January 27, 2020 1:53 PM
To: Nathan Stewart <nstewart@mccall.id.us>
Cc: Scott Corkill <scorkill@idl.idaho.gov>; Josh Purkiss <jpurkiss@idl.idaho.gov>; Zane Lathim <zlathim@idl.idaho.gov>
Subject: RE: White Pine - Shady Lane

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Hi Nathan,

We are still working on the valuation determination. I am trying to get some options on this. We would like to move forward with the annexation, perhaps there is a way there to get the costs removed on the easement. I am having Josh Purkiss and Zane Lathim from IDL work as the leads on the annexation and waterline easement project.

Thanks,
Ryan

From: Nathan Stewart <nstewart@mccall.id.us>
Sent: Friday, August 09, 2019 10:09 AM
To: Ryan Montoya <rmontoya@idl.idaho.gov>
Cc: Scott Corkill <scorkill@idl.idaho.gov>
Subject: RE: White Pine - Shady Lane

Ryan,

I've been working with staff and legal on justifying connectivity of the parcel (lot 12, Block 1) to the City limits to allow annexation (without requiring annexation of any other private property). What I'm being told is that the Lick Creek Road ROW is not a viable option for justifying contiguous adjacency to the City limits boundary (due to some State Statute language that prohibits shoestring ROWs), but.....the corner of Lot 12, Block 1 that abuts the Pilgrim Cove Road ROW (along the section line and abutting Cee Way Subdivision will be sufficient for justifying contiguous adjacency.

I am still awaiting legal's final confirmation of this. We need to confirm the legal descriptions of the City limits at this corner location with the legal description of lot 12, Block 1. I'll let you know when I hear more. Otherwise, the conceptual road/lot alignment looks fine. For now, based on your vision for future buildout of the parcel, you'll want to assume that this potential road ROW (that connects Miles Standish to Lick Creek) would be a local collector (70').

How about on your end? Has planning staff been able to better justify \$\$ value of the water main's location within the parcel for IDL and that granting an easement to the City to maintain it does not depreciate IDL property or create any financial burden (since such an easement would be located within an already platted road and utility corridor)?

Nathan T. Stewart, P.E.
McCall Public Works Director
216 E. Park Street, McCall, ID 83638
Ph.: 208-634-8943 | Cell: 208-315-3304 | Fax: 208-634-4170

From: Ryan Montoya <rmontoya@idl.idaho.gov>
Sent: Friday, August 9, 2019 7:56 AM
To: Nathan Stewart <nstewart@mccall.id.us>
Cc: Scott Corkill <scorkill@idl.idaho.gov>
Subject: White Pine - Shady Lane

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Nathan,
Any update from your side on the feedback for the rerouting of the road and the annexation?
Thanks,
Ryan

Idaho Department of Lands

Payette Endowment Land Strategy



December 2020

Table of Contents

Executive Summary	iii
Information Disclaimer	iv
I. Introduction	1
Mission and Management Directives of State Endowment Trust Lands	1
Purpose and Need	1
II. Planning Area	3
Payette Lakes Area Management	3
City of McCall and Valley County Planning	3
Payette Endowment Lands Planning Area	4
III. Land Asset Management	5
Timber Management	5
Land Leasing	5
Disposition	6
Land Exchange	7
IV. Transition Lands	7
V. Payette Endowment Land Strategy Analysis	11
Tier I Planned Transition (1-5 years) – Parcels A, K and M	12
Tier II Probable Transition (5-10 years) – Parcels B, C and F	13
Tier III Feasible Transition (10-20 years) – Parcels D, E, and G.	15
Tier IV Transition Not Planned – Parcels H, I, J, and L	16
VI. Implementation Strategies (IS)	19
Transition Strategies	19
Adaptive Management	20
Appendix – Transition Land Profiles	21

Executive Summary

The Payette Endowment Land Strategy (“Plan”) is a management plan for the 5,478 acres of endowment land surrounding and within the City of McCall (“McCall”) in Valley County, Idaho. The Plan outlines how the Idaho Department of Lands (“Department”) will implement management of endowment trust land within the McCall’s Area of Impact (“Area of Impact”) over the next 20 years. The remainder of the endowment trust land outside of the Area of Impact will be managed through other policies adopted by the Idaho State Board of Land Commissioners including the Forest Asset Management Plan, Statement of Investment Policy, Strategic Reinvestment Plan, and Asset Management Plan.

Historically, the Department has implemented land asset plans based on specific asset classifications (e.g., Cottage Site Disposition Plan). Unlike asset-specific plans, this Plan identifies the risks and opportunities of maximizing financial returns and management efficiencies for endowment trust lands within the geographic scope of a growing community. The Plan seeks to guide land management decisions within the City of McCall’s Area of Impact as growth patterns influence the Department’s ability to implement traditional land management and take advantage of opportunities for higher revenue generation.

This Plan explores strategies across short (Tier I), mid (Tier II), and long-term (Tiers III and IV) timeframes on certain properties located within the Area of Impact. Specifically, the Plan examines approaches to transition lands to higher and better uses where land values are significantly higher than traditional asset classifications and revenue generation is either not commensurate with values or is impaired by surrounding urbanized uses.

The Plan is intended to be an adaptive management plan that will be reviewed and updated regularly as community development, land use patterns, and market trends develop over time. The Plan will also be evaluated for alignment and consistency with the Land Board’s policy and plans as necessary.

Information Disclaimer

The facts and figures presented in this document are preliminary and for discussion purposes only. Any site-specific data including values and acreage are estimates based on market data, trends, and best available information. Implementation of this plan will require additional analysis and due diligence, such as site plans and USPAP compliant appraisals.

I. Introduction

Mission and Management Directives of State Endowment Trust Lands

Upon statehood in 1890, Idaho received a total of 3,650,000 acres of land in trust from the federal government as a means for generating revenue for specific public services and institutions, or “endowment beneficiaries.” The State Constitution establishes the State Board of Land Commissioners (“Land Board”) as the trustee over the assets of the nine endowments. Through Idaho Code § 58-101, the Land Board created the Idaho Department of Lands (“Department”) to manage the land assets of the trust “in such manner as will secure the maximum long-term financial return.”

Over time, the Department has leased, sold, acquired, and exchanged endowment lands. Today, the Department manages 2,500,000 acres of state endowment trust land prudently, efficiently, and with accountability to the beneficiaries. To achieve this, the Department has established general operating expectations including:

- Preserving land holdings where leasing will generate a competitive rate of return.
- Seeking to enhance land values before considering sale or exchange of underperforming land assets.
- Acquiring lands, structures, and resources when the acquisition will add value or diversification to the overall trust portfolio.
- Selling lands, structures, and resources when the outcome adds value to the overall trust portfolio.
- Exchanging lands and resources when the exchange will add value or diversification to the overall trust portfolio.

The land management strategies of the Land Board and the Department are guided first by the Idaho Constitution and the requirement to “secure the maximum long-term financial return to the institution to which granted...” This guiding principle is further detailed in Land Board approved management strategies including the Statement of Investment Policy, which establishes a basis for evaluating investment and management results, and a relevant time horizon for which assets will be managed. The Department’s specific management strategies are further defined by the Asset Management Plan, which among other things, provides staff guidance on decision making across land asset classes.

Purpose and Need

The original federal land grants in Idaho were based on the land allocation of the Public Lands Survey System (“PLSS”). The federal grant of endowment trust land to the state of sections 16 and 36 inherently created challenges associated with non-contiguous land ownership patterns. In other words, the state

was granted endowment lands in a “checkerboard” pattern across the state. As a result, the Department has worked, through time, to consolidate the lands into large blocks.¹ J

Trust land assets are classified according to their “primary” use; while other uses may be allowed, the primary use drives much of the management decisions for those lands. Of the approximate 2,500,000 acres of endowment land managed by the Department, there are two major asset classes, rangeland and timberland (1,758,213 acres and 1,030,498 acres, respectively). Endowment land management does not occur in isolation.

Many endowment lands face management challenges where the primary use classification is in conflict or in some way impeded by surrounding uses and ownership (for example, timber management within city boundaries). Historically, this conflict was minimal due to limited development and growth. However, the population of Idaho has grown over the last few decades, and areas once primarily used, valued, and assessed as timberlands or grazing are now in the highest growth areas in the state. The result is endowment lands in areas surrounded by and intermingled with residential and commercial development. This creates a situation where the land is classified by the Department as its historical use, which does not align with the current market value, use, and/or designation. The overarching effect is revenue that is not commensurate with the Department’s “primary” use of that asset.

As defined by the Land Board approved Statement of Investment Policy, “lands within traditional asset classes already owned by the Endowment may become suitable for a higher and better use than the current asset classification. Often these properties exhibit high property values and low annual revenues (underperforming), and may be encroached upon by urban development.” The Department considers these lands as “transition lands.” Transition lands require broader planning in the context of surrounding uses and market conditions but will be specific to individual sites. As market and regional conditions are not static, it is necessary to develop transition strategies that provide for long-term time horizons.

Therefore, the following Plan considers both the current and future trends of the McCall area and provides a suite of strategies to maximize revenue generation over a 20-year time horizon.² The following are the goals of this Plan:

1. Describe the current situation of endowment trust land in the vicinity of McCall.
2. Identify endowment trust lands characterized as “transition lands.”
3. Determine the timeframe/tier the property falls within for next steps.

¹ The endowment trust land in this plan was consolidated through the lieu land selection process and numerous land exchanges.

² The Department considered developing the Payette Endowment Land Strategy as a comprehensive plan. It even reviewed and inquired into Montana’s Department of Natural Resources’ study on Whitefish, MT as a comparison for a comprehensive plan. However, due to the time, costs, and rapidly changing market conditions in McCall, it was determined that a plan that evaluated specific individual sites would be applicable and accurate. Additionally, the Department was concerned that a comprehensive plan could limit the flexibility and accuracy of specific property conditions at a given time, for example, property values.

4. Describe the next steps the Department will take to transition the lands to align with Land Board direction and constitutional requirements.


II. Planning Area

Payette Lakes Area Management



The endowment lands identified in this Plan are managed by the Payette Lakes Supervisory Area (“Supervisory Area”). The Supervisory Area is responsible for the management of 183,411 acres of endowment land within Adams, Washington, Valley, Idaho, and Gem counties. The Supervisory Area manages 105,229 timbered acres with the remaining 78,182 acres classified as non-timber, primarily rangeland.

City of McCall and Valley County Planning

McCall is a mountain community located along the shores of Payette Lake in Valley County. McCall has a long history as a destination/resort town surrounded by the West Central Mountains, Payette National Forest, and close proximity to two major ski resorts. These outdoor amenities and relative proximity to the population center of Boise have made McCall a recreational destination, which is both a major driver of its economy and land development pattern. As such, much of the community’s comprehensive plan is focused on promoting land uses that support the community and preserve the surrounding natural amenities, particularly viewsheds, open space, and recreational opportunities.

While  McCall is the jurisdiction for its city limits, it also has the authority over the Area of Impact, which is outside of the city boundary  Valley County’s population growth and increase in recreational-tourism has brought with it changes in use and development patterns as well as priorities of community values. These changes affect the use of endowment lands.

Endowment lands located adjacent to or in proximity to urban development exhibit characteristics of high market value relative to traditional revenue generation (timber management). In addition, adjacent uses such as residential or commercial development may inhibit or prevent the maximum revenue generation of a property due to limitations of certain uses or opposition to such uses as intensive timber management. For these reasons, there is a continuing need to evaluate and discuss future endowment lands within and immediately outside of McCall’s city limits and Area of Impact.

Land use in the region of focus is guided by the Valley County Comprehensive Plan and City of McCall  Comprehensive Plan, both updated in 2018. Both plans serve as guiding documents for McCall and Valley County’s future development. Idaho law requires that cities and counties designate areas of city impact as a basis for planning to anticipate future growth needs. The management of endowment lands in the vicinity of the City of McCall  one example of conflicting uses and ownership.

Payette Endowment Lands Planning Area

There are 5,478 acres of endowment lands within the Area of Impact (Figure 1). While state endowment trust lands are not subject to local zoning ordinances, lands within local jurisdictions are likely to be impacted by local land-use decisions and decisions on adjacent private lands. The majority of endowment lands within the planning area are classified as timberland. Residential and commercial endowment lands make up the small portion of remaining lands (0.94%). Although timber management is the primary management activity on the majority of these endowment lands, secondary leasing activities occur on 3,668 acres, which include communications, grazing, minerals, residential, and other activities.

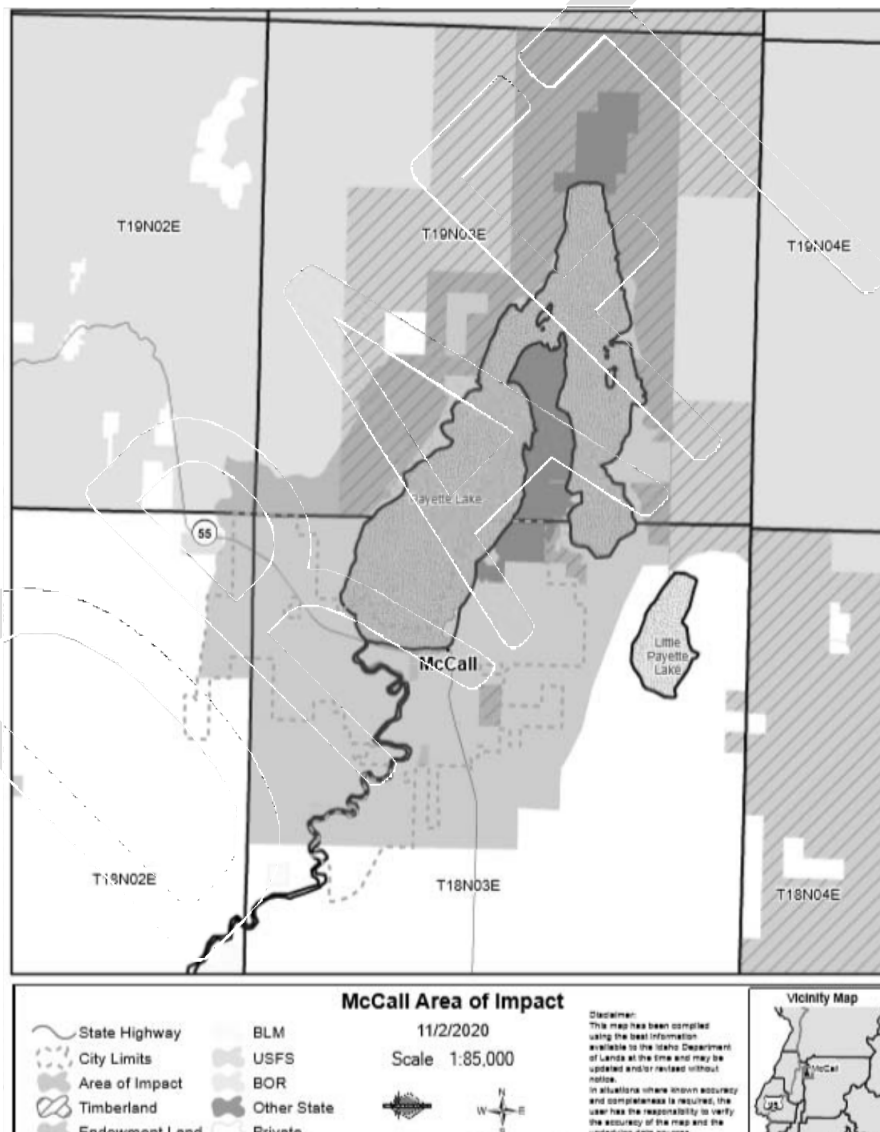


Figure 1. Payette Endowment Land Strategy Planning Area

III. Land Asset Management

Through the direction of the Land Board, the Department manages endowment land assets to capture full potential economic value for the beneficiaries. As outlined in the Asset Management Plan, the general operating expectations by which endowment lands are managed include but are not limited to the following:

- Preserving land holdings where leasing will generate a competitive rate of return.
- Seeking to enhance land values before considering sale or exchange of underperforming land assets.
- Acquiring lands and resources within traditional asset classes when the acquisition will add value or diversification to the overall trust portfolio.
- Selling lands, structures, and resources when the outcome adds value to the overall trust portfolio.
- Exchanging lands and resources when the exchange will add value or diversification to the overall trust portfolio.

Timber Management

Timberland assets are guided by the Forest Asset Management Plan, which provides the tactical and strategic direction for timber management over a 5–10-year time horizon. The Forest Asset Management Plan also provides a planning structure by which each supervisory area develops a specific localized plan. The Payette Lakes Forest Asset Management Plan, which was finalized in 2019, considered nine alternative strategies to explore the costs and benefits of various management approaches and limitations. The preferred management strategy for the Payette Lakes region focuses on reducing standing volume at a reasonable pace by implementing the following four strategies:

- Reduction of large diameter volume
- Reduction of over mature volume
- Harvest volume levels with low risk of age class gaps and near future volume reduction
- Allow increase in growth resulting in more resilient, healthy forests

Land Leasing

Pursuant to Article IX Section 8 of the Idaho Constitution, the Land Board is required to “provide for the location, protection, sale or rental of all the lands heretofore” and, with specific regard to leasing activities, “contract with private entities to operate business activities upon the land trust assets.” One of the primary strategies by which the Land Board and the Department generate revenues on endowment lands is through leasing contracts. Leasing activities are allowed on all endowment lands so long as they generate a competitive rate of return, do not degrade the land asset, and do not adversely affect the primary use of the land asset.

For each of the major leasing types, the Asset Management Plan identifies specific strategies to achieve the overall management goals identified therein. The following leasing types are those currently and most commonly occurring in the planning area:

Residential

- For the duration of the cottage site leasing program, develop and manage residential leases that appropriately compensate the endowments.³

Commercial

- Develop and manage commercial leases that achieve a rate of return consistent with objectives in the Statement of Investment Policy.
- Ensure lease terms and conditions comport with industry standards.

Grazing

- Develop and manage long-term grazing leases that achieve a rate of return consistent with the objectives in the Statement of Investment Policy.
- Minimize contractual and environmental risks.

Minerals

- Lease lands for potential mineral products that capitalize on market demands.
- Minimize contractual and environmental risks associated with extractive industries.

Table 1. Current Leasing Activity in the McCall AOI (As of December 2020)

Lease Activity	Number of Leases	Acres Leased
Commercial- Communications	1	4
Grazing	3	2,090
Minerals	4	400
Miscellaneous	6	1,145
Residential	20	10

Disposition

From the initial granting of state endowment lands, disposition has been considered a potential management strategy towards achieving the constitutional mandate as described in Article IX Section 4 of the Idaho Constitution. In accordance with the Asset Management Plan, disposition of endowment lands should be considered when the result adds value to the overall trust portfolio, either through reinvestment or reduction of risk. The Asset Management Plan further identifies specific management objectives for disposition, including:

- Increase long-term financial return at a prudent level of risk.

³ The Land Board approved Voluntary Auction For Ownership properties are not included in this strategy, as they have already been approved for disposition under another plan.

- Reduce cost through improved management efficiency.
- Adjust land holdings based on current and projected market conditions to capture value in excess of target returns.
- Evaluate and prioritize proposed transactions.

Residential

- Execute the approved Cottage Site Plan to unify the estate in a business savvy manner to maximize return to the trust beneficiaries.

Land Exchange

The land asset portion of the endowment trust has been maintained to generate revenues for the beneficiaries as well as reduce overall risk by providing diversification from the financial assets portion of the trust portfolio. Management risk associated with the land asset is due in part to the allocation of endowment lands when first granted. While efficient for distribution of the large amount of land to western states, the PLSS system created a “checkerboard” pattern of ownership, with endowment lands being intermingled with both private and federal lands. As stated in the Asset Management Plan, a primary management philosophy is to “seek to reposition parcels to reduce risk, lower management costs.” Land exchanges with private owners and other public agencies provide an opportunity to reposition land assets.

While land exchanges may be proposed by private landowners and public agencies, the outcome of the exchange must meet specific criteria set out by the Land Board including, but not limited to:

- **Equal or greater value.** Land to be acquired by the state must be at least as valuable as the state land being exchanged.
- **Consolidation of state lands.** Consideration will be given to a land exchange that results in the consolidation of existing state lands.
- **Access.** Consideration will be given to a land exchange whose acquisition will improve access to existing state lands.
- **Equal or greater income to the trust.** Consideration will be given to a land exchange that results in the state receiving equal or greater income for the endowment beneficiaries.

IV. Transition Lands

As stated in the Asset Management Plan, “[I]and asset classifications can be changed to meet changing markets or to capitalize on emerging alternative opportunities.” The Land Board approved Statement of Investment Policy and Asset Management Plan direct the Department to identify potential lands that should be classified as transition lands. The Department has identified certain properties as transitional and the respective next steps based on a “Tier” designation.

Lands within the Tier I-III designation have been identified for transition due to their underperformance in terms of revenue generation relative to their estimated land value. Much of this financial gap is caused by higher land values associated with urban development and growth rather than traditional asset classifications such as timberland. In other instances, properties may have commercial and residential classifications, but little to no current revenue generating activities occur on these properties. As a result, the lands within the planning area generate approximately \$257,535 annually and have an estimated total land value of \$53,080,952 or 0.49% return on value. Thus, using a 4% return rate as a benchmark, there is a gap of approximately \$1,888,703 in annual revenue.

Again, the revenue gap is based on estimated values of the land in the impact area that has increased in value due to the market. The land, which is predominantly timberland, has value that is not commensurate with the Department's classification of timberland. The result is the need to increase revenue on the high value lands. Increasing revenue can be accomplished through leasing or repositioning of the assets into new revenue producing assets or disposition.

Implementation of this Plan will impact approximately 373 acres or 6.9% of the endowment lands within the Area of Impact while addressing 88.0% of the land value held by the endowments within the Area of Impact over the next 20 years.

The following outlines those parcels within the planning area by their transition tier designation. Each profile provides a snapshot of the parcel, its current use and revenue generation, as well as the zoning and future land-use designations identified by McCall as part of its comprehensive planning process. Although endowment trust lands are not subject to these zoning designations, it does provide the reader an understanding of current and potential surrounding land uses in which the parcel is located. More in-depth descriptions and information regarding the transition potential for each parcel can be found in the Appendix.

Tier I – Planned Transition

Lands identified in the Tier I classification are those that have a high probability of transitioning within the next 1-5 years. Such parcels typically have a high land value relative to current revenue generation, typical of lands within or adjacent to urbanized areas. Tier I lands also have features necessary for the facilitation of transitions to higher and better uses, such as on-site utilities, road frontage, platted, annexed within city limits, and within sewer and water capacities. Such characteristics allow a parcel to be transitioned in the near future, which means they are able to maximize favorable market conditions.

Management strategies for Tier I parcels include:

- Work with third-party advisor to develop preliminary site scenario.
- Perform preliminary valuation of property.
- Work with third-party brokers to market property within appropriate markets for leasing or sale of property.

Tier II – Probable Transition

Lands classified as Tier II are similar to Tier I in that urban growth has influenced either current management or is likely to in the near future. These changes are reflected in the disparate land value to current revenue generation, similar to Tier I. Also similar to Tier I properties, Tier II lands may possess some attributes favorable to transition, such as being located within or adjacent to city limits, on-site or adjacent utilities, and access. However, unlike Tier I parcels, additional planning processes are necessary to move forward with a transition. Such steps may include final platting or sewer and water capacity determination. Also, like Tier I parcels, the Tier II classification has a market element. Markets or demand for Tier II parcels may not be favorable currently or in the near term due to the availability of other lands.

Management strategies for Tier II parcels include:

- Gain jurisdictional approvals, such as annexation, utility access, or subdivision platting.
- Perfect legal access, if not already available.
- Continue or seek leasing opportunities until market conditions for transition are more favorable.
- Facilitated discussions with stakeholders to establish coordination and cooperation within constitutional limitations and mandate.

Tier III – Feasible Transition

Tier III parcels are those within the Area of Impact that are not currently impacted by urban uses but may be transitioned over the next 10-20 years. Therefore, within the context of this Plan, endowment lands identified as Tier III will continue to be managed in accordance with their current asset classification so long as they do not meet the criteria of Tier I or Tier II. However, as with the City and County's comprehensive plans, these lands will be continuously reviewed during the timeframe and management strategies and adjusted as growth occurs.

Management strategies for Tier III parcels include:

- Continue or seek leasing opportunities until market conditions for transition are more favorable.
- Review property and market conditions every 1-5 years for conditions and potential for transition.
- Participate in City and County planning processes to ensure mission and objectives for state endowment land management are incorporated into comprehensive planning processes.
- Work with local land use jurisdictions to assure endowment lands are appropriately zoned and understood.
- Facilitated discussions with stakeholders to establish coordination and cooperation within constitutional limitations and mandate.

Tier IV – Transition not Planned



































All lands outside of the city limits and that do not meet the criteria of Tier I-III lands and are likely to continue under current asset management strategies in the next 10-20 years are considered Tier IV.

Although these lands may be reconsidered in the future, there are no expected or intended management changes for these lands.

Management strategies for Tier IV parcels include:

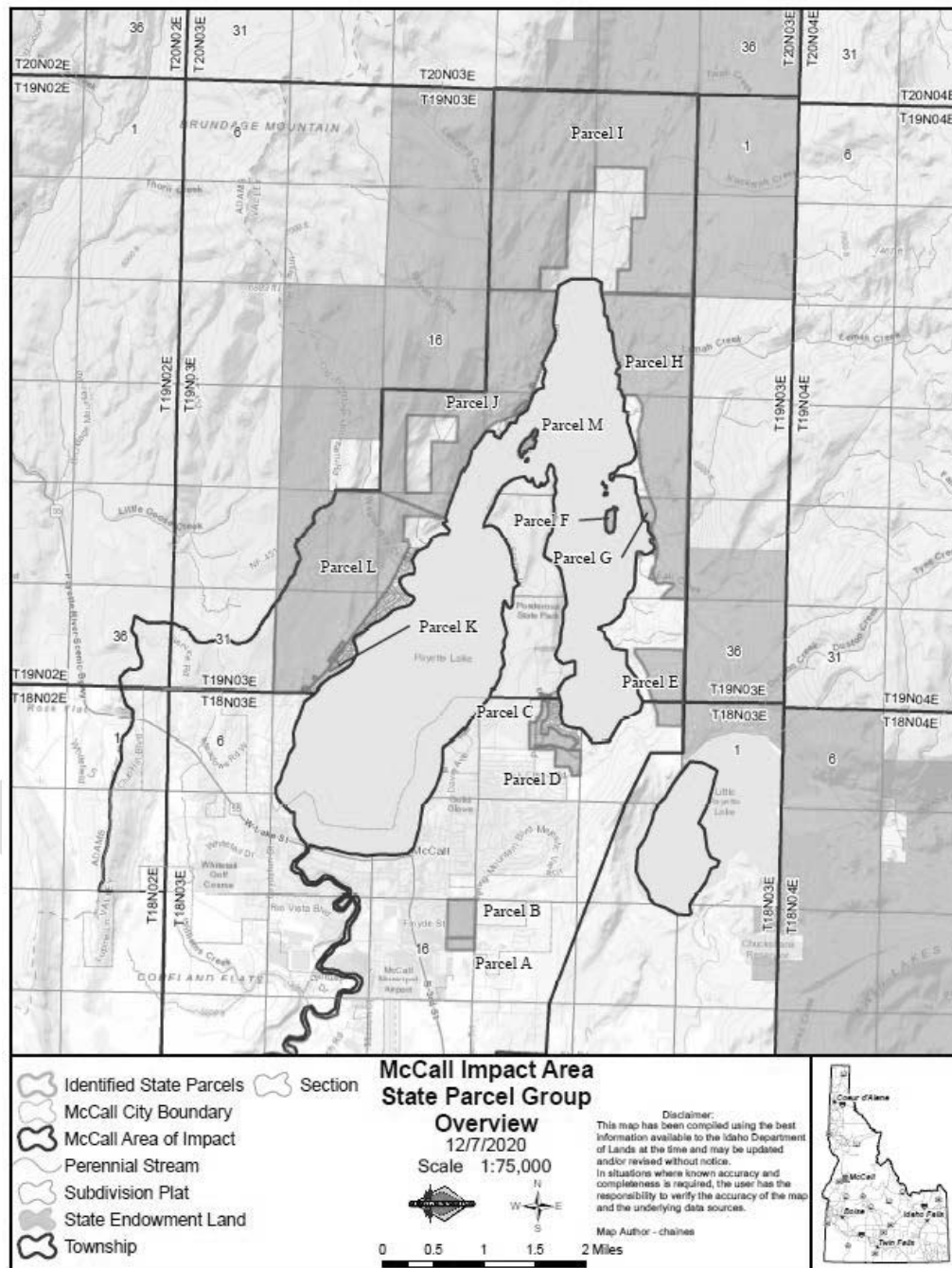
- Continue current land management strategies and seek opportunities to enhance revenue potential for individual sites.
- Participate in City and County planning processes to ensure mission and objectives for state endowment land management are incorporated into comprehensive planning processes.

Table 2. Transition Lands Matrix

	Tier I	Tier II	Tier III	Tier IV
Primary/Secondary Timber Base			 	 
Planned Timber Harvest			 	 
Grazing/Mineral/Recreation Lease			 	 
Water/Sewer/Electric Utilities On Site	 	 	 	
Preliminary Plat	 	 		
Zoned R4 or Greater Density	 	 		
Residential/ Commercial Lease	 	 		
Zoned CC or I	 			
Final Plat	 			

V. Payette Endowment Land Strategy Analysis


The Department has identified certain parcels within the Area of Impact to be included and identified in the Plan. Those parcels have corresponding letter designations as Plan identifiers. Below and in the Appendix is a description of each parcel with the corresponding Tier designation.



Tier I Planned Transition (1-5 years) – Parcels A, K and M


Parcel A - Deinhard Commercial



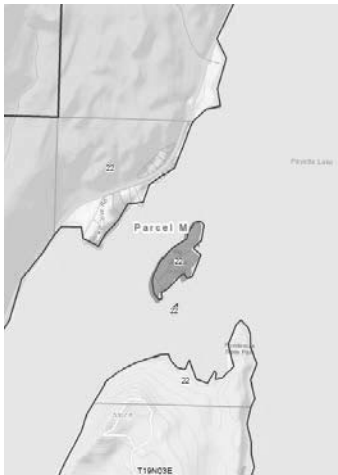
Acreage	+20
Current Asset Class	Commercial Real Estate
Current Leasing Activity	Office/Retail, Communication
Current Annual Revenue	\$28,750
Current Estimated Value	\$1,150,000
Target Rental Rate	4%-8% based on Commercial HBU
Target Yearly Revenue	\$69,000
Yearly Revenue Gap	(\$40,250)
Current Zoning	CC- Community Commercial
Future Land Use Plan Designation	Commercial Development 
Access	Deinhard Lane and Spring Mountain Boulevard
Utilities	Water, Sewer, Electric

Parcel K - Syringa Park



Acreage	+3.56
Current Asset Class	Residential Real Estate
Current Leasing Activity	Residential
Current Annual Revenue	\$0
Current Estimated Value	\$240,000 based on 3-4 acres
Target Rental Rate	4% Based on Residential HBU
Target Yearly Revenue	\$9,600
Yearly Revenue Gap	(\$9,600)
Current Zoning	R4- Low Density Residential
Future Land Use Plan Designation	Medium Density Residential
Access	Warren Wagon Road and Payette Drive
Utilities	Sewer, Electric 

Parcel M - Cougar Island





Acreage	+14.21
Current Asset Class	Residential Real Estate
Current Leasing Activity	Residential
Current Annual Revenue	\$32,440
Current Estimated Value	\$4,795,000
Target Rental Rate	4% Based Upon Residential HBU
Target Yearly Revenue	\$191,800
Yearly Revenue Gap	(\$159,360)
Current Zoning	RR- Rural Residential
Future Land Use Plan Designation	Large Residential
Access	Boat only
Utilities	Lake water, solar electric, drainfield for existing leased lot

Tier II Probable Transition (5-10 years) – Parcels B, C and F




Parcel B - Deinhard Residential



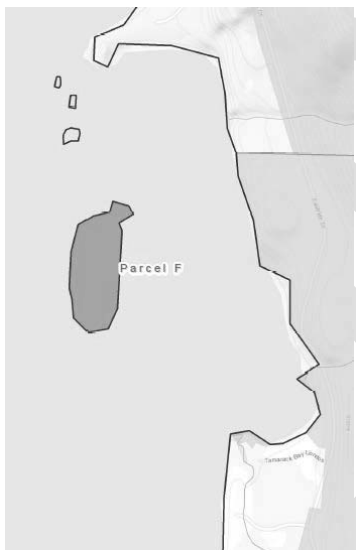
Acreage	+60
Current Asset Class	Residential Real estate/Timberland
Current Leasing Activity	None
Current Annual Revenue	\$0
Current Estimated Value	\$595,000
Target Rental Rate	4% Based Upon Residential HBU
Target Yearly Revenue	\$23,800
Yearly Revenue Gap	(\$23,800)
Current Zoning	R4- Low Density Residential
Future Land Use Plan Designation	Rural Residential 
Access	Deinhard Lane, Spring Mountain Boulevard, 3 rd Street
Utilities	Water, Sewer, Electric 



Parcel C - White Pine



Acreage	+56.1
Current Asset Class	Residential Real Estate/Timberland
Current Leasing Activity	None
Current Annual Revenue	\$0
Current Estimated Value	\$21,750,000 Potential of 150 lots
Target Rental Rate	4% based on Residential HBU
Target Yearly Revenue	\$870,000
Yearly Revenue Gap	(\$870,000)
Current Zoning	R4- Low Density Residential 
Future Land Use Plan Designation	Rural Residential 
Access	Pilgrim Cove Road, John Alden Road, Miles Standish Road
Utilities	Water, Sewer, Electric 



Parcel F - Shellworth Island



Acreage	+13.1
Current Asset Class	Residential Real estate
Current Leasing Activity	Residential
Current Annual Revenue	\$11,070
Current Estimated Value	\$2,400,000
Target Rental Rate	4% based on Residential HBU
Target Yearly Revenue	\$96,000
Yearly Revenue Gap	(\$84,930)
Current Zoning	RR- Rural Residential 
Future Land Use Plan Designation	Ag-Forest Conservation 
Access	Boat only
Utilities	Lake water, solar electric, drainfield for existing leased lot

Tier III Feasible Transition (10-20 years) – Parcels D, E, and G

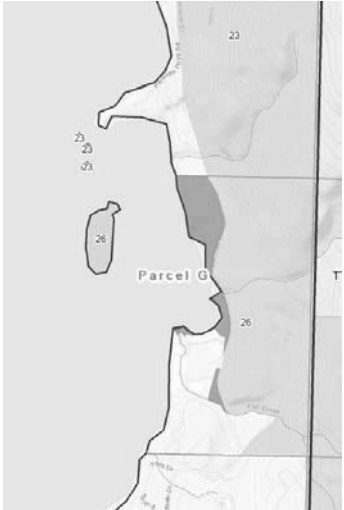
Parcel D - Lick Creek

	Acreage	+29
	Current Asset Class	Timberland
	Current Leasing Activity	Communication
	Current Annual Revenue	\$10,850
	Current Estimated Value	\$6,000,000
	Target Rental Rate	4% based on Residential HBU
	Target Yearly Revenue	\$240,000
	Yearly Revenue Gap	(\$229,150)
	Current Zoning	R4- Low Density Residential
	Future Land Use Plan Designation	Low Density Residential
	Access	Lick Creek Road, Pilgrim Cove Road, Miles Standish Road, Shady Lane
	Utilities	Water, Sewer, Electric 

Parcel E - Eastside Drive

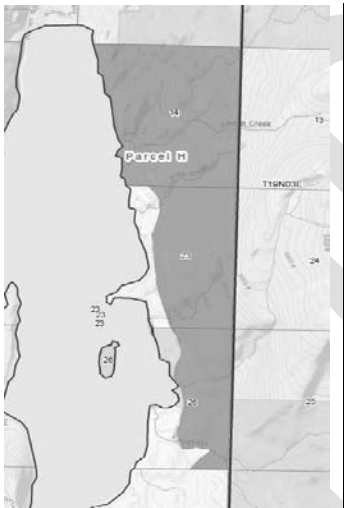

	Acreage	+160
	Current Asset Class	Timberland
	Current Leasing Activity	Grazing, Commercial Recreation
	Current Annual Revenue	\$14,167
	Current Estimated Value	\$400,000
	Target Rental Rate	4% based on Residential HBU
	Target Yearly Revenue	\$16,000
	Yearly Revenue Gap	(\$1,833)
	Current Zoning	RR- Rural Residential
	Future Land Use Plan Designation	Ag-Forest Conservation
	Access	Eastside Drive and Fall Creek Road
	Utilities	Sewer, Electric

Parcel G – East Shoreline

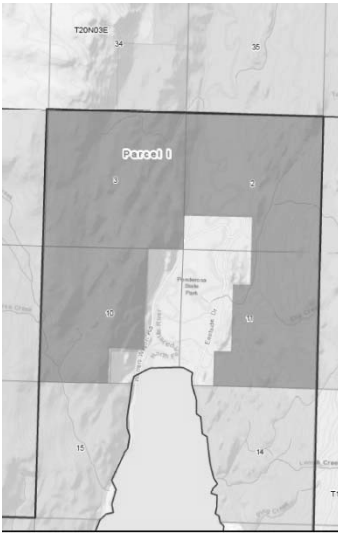
	Acreage	+21
	Current Asset Class	Timberland
	Current Leasing Activity	None
	Current Annual Revenue	\$0
	Current Estimated Value	\$9,700,000
	Target Rental Rate	4% based on Residential HBU
	Target Yearly Revenue	\$388,000
	Yearly Revenue Gap	(\$388,000)
	Current Zoning	RR- Rural Residential
	Future Land Use Plan Designation	Low Density Residential
	Access	Eastside Drive
	Utilities	Sewer, Electric

Tier IV Transition Not Planned – Parcels H, I, J, and L

Parcel H - East of Eastside Drive to Tip

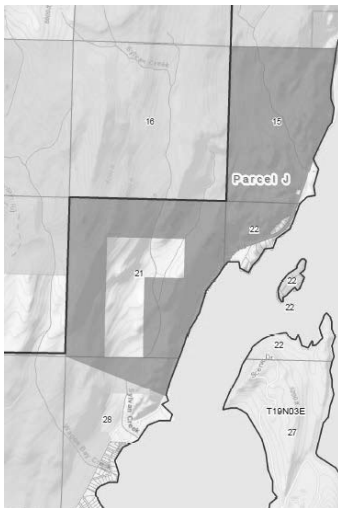
	Acreage	+1040
	Current Asset Class	Timberland
	Current Leasing Activity	Grazing, Mineral
	Current Annual Revenue	\$48,739
	Current Estimated Value	\$1,560,000
	Target Rental Rate	4% based on Residential HBU
	Target Yearly Revenue	\$62,400
	Yearly Revenue Gap	(\$13,661)
	Future Land Use Plan Designation	Ag-Forest Conservation
	Access	Eastside Drive
	Utilities	Sewer, Electric 

Parcel I – Tip



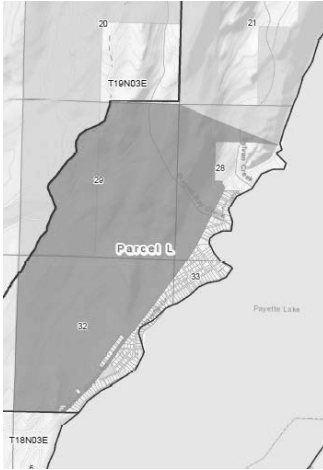
Acreage	<u>+2040</u>
Current Asset Class	Timberland
Current Leasing Activity	Grazing, Mineral, Noncommercial Recreation
Current Annual Revenue	\$28,257
Current Estimated Value	\$570,000
Target Rental Rate	4% based on Residential HBU
Target Yearly Revenue	\$22,800
Yearly Revenue Gap	\$5,457
Current Zoning	RR- Rural Residential
Future Land Use Plan Designation	Ag-Forest Conservation
Access	Eastside Drive, Warren Wagon Road
Utilities	None


Parcel J - Northwest Warren Wagon



Acreage	<u>+380</u>
Current Asset Class	Timberland
Current Leasing Activity	Grazing
Current Annual Revenue	\$28,135
Current Estimated Value	\$880,952
Target Rental Rate	4% based on Residential HBU
Target Yearly Revenue	\$35,238
Yearly Revenue Gap	(\$7,103)
Current Zoning	RR- Rural residential
Future Land Use Plan Designation	Ag-Forest Conservation
Access	Warren Wagon Road
Utilities	Sewer, Electric

Parcel L – Southwest Warren Wagon



Acreage	+1520
Current Asset Class	Timberland
Current Leasing Activity	Grazing, Mineral, Commercial Recreation
Current Annual Revenue	\$98,637
Current Estimated Value	\$3,040,000
Target Rental Rate	4% based on Residential HBU
Target Yearly Revenue	\$121,600
Yearly Revenue Gap	(\$22,963)
Current Zoning	RR- Rural Residential
Future Land Use Plan Designation	Low Density Residential 
Access	Warren Wagon Road, Green Gate Road
Utilities	Sewer, Electric

VI. Implementation Strategies (IS)

Transition Strategies

Tier I

IS-1.1 Perform full USPAP compliant appraisals for Tier I properties identified herein. Appraisal will be used to set base rent or disposition value.

IS-1.2 Work with a third-party advisor to develop individual transition plans for each Tier I property identified herein.

IS-1.3 Convene a key stakeholder group to review proposed strategies and garner feedback for consistency with community vision, within the Department's constitutional limitations and mandate.

IS-1.4 Market Tier I properties based on third-party recommendations and timeframe.

IS-1.5 Evaluate alternative actions (land exchange or disposition) if IS-1.4 marketing is unsuccessful.



Tier II

IS-2.1 Work with a third-party advisor to develop individual transition plans for each Tier II property identified herein.

IS-2.2 Complete platting and annexation processes with the City of McCall for Parcels B and C.

IS-2.3 Utilities, sewer and water

IS-2.4 Conduct public outreach and presentations to Valley County and City of McCall Commissioners regarding transition plans.

IS-2.5 Seek short-term leasing opportunities on Parcels B and C to generate interim revenues while not prohibitively encumbering future transition potential.

IS -2.6 Lease Parcel F under conditional provisions that will allow for the eventual transition of the parcel.

Tier III

IS-3.1 Seek leasing opportunities on Parcel G that generate mid-term revenues and that do not hinder future transition potentials.

IS-3.2 Seek new or additional leasing opportunities on Parcels D and E that increase revenue generation relative to property values.

IS-3.2 Participate in City and County planning processes to ensure mission and objectives of endowment land management are incorporated into planning processes.

IS-3.3 Conduct annual and five-year reviews of land development and market conditions.

Tier IV

IS-4.1 Continue current land management strategies and seek opportunities to enhance revenue potential for Parcels H, I, J, and L.


IS-4.2 Participate in City and County planning processes to ensure mission and objectives of endowment land management are incorporated into comprehensive planning processes.

Adaptive Management


The Plan is not intended to be a static plan, but rather provide guidance to decision making on state endowment lands in the Area of Impact. The Department recognizes that factors such as market conditions, population growth, and even community vision are dynamic processes that change over time. As such, the Plan will be reviewed over the course of the planning horizon to consider changing conditions and future trends.

Appendix – Transition Land Profiles

Parcel A - Deinhard Commercial

Legally Permissible: Parcel A is currently located in McCall’s Community Commercial (“CC”) zoning designation. There are multiple permitted uses in this zoning designation, as well as use-based conditional use approval. Permitted development includes a wide variety of industrial and commercial uses (agriculture or garden use, amusement facility, bank, night club, care center, local housing unit, lumber supply store, laundry mat, nursery, retirement home, studio, automobile service, bar, brew pub, church, medical clinic, hotel, professional offices, package delivery service, retail store, R&D facility, restaurant, theater, and vocational school). McCall’s land use plan designates the property as likely use being commercial development. The property would likely be allowed a variety of general commercial uses. 

Physically Possible: Parcel A is approximately 20 acres, and has existing improvements, including the Payette Lakes Supervisory Area office facilities and a leased communication site. There is an easement for a walking path that traverses the frontage. The topography is generally level and configured to allow for development alternatives. The size allows for development scenarios of a mid-sized general commercial, light industrial, or retail use. The property has accessibility off of East Deinhard Lane and Spring Mountain Blvd. Municipal utilities are immediately available including water, sewer, and power. The property’s physical characteristics do not restrict development potential.

Financially Feasible: Transitioning of the property should include considerations of the probability of attaining a maximum return on investment. Any proposal should consider the marketable attributes of the property and local market including strengthening rents, buyer demand, and vacancy. A number of local agents reported lease rate improvement upon renewals and new leases. Recent commercial construction activity is expanding in the immediate area, including Idaho First Bank, McCall Design & Planning (architect), Ridley’s Family Market, and Legend CrossFit. Given these trends, commercial development appears to be financially feasible. 

Maximally Productive: Approximately 20 acres of general commercial use.

Most probable buyer/tenant: Commercial owner/occupant, build-to-suit developers, or commercial recreation.

Current Revenue: \$28,750 from three (3) Office Leases and a Communication Site Lease.

Tier Category: Tier I – Planned Transition.

Parcel B - Deinhard Residential

Legally Permissible: Parcel B is currently located in McCall's Low Density Residential ("R4") zoning designation. R4 restricts development of property to low-density single-family residential neighborhoods with a maximum density of four dwelling units per acre. A subdivision in this zoning designation would likely consist of larger single-family home sites. A conceptual development plan would need to be provided to develop a more comprehensive understanding of what is legally permissible on this site.

Physically Possible: Parcel B is approximately 60 acres, located to the north of Parcel A. The property is located in an area adjacent to residential development. Access is off of East Deinhard Lane and Spring Mountain Blvd. The shape of the parcel is rectangular with road frontage, width, and depth to allow for residential uses. The site topography is gentle to flat, conducive for a residential construction. Public utilities are available to the property including water, sewer, and electricity.

Financially Feasible: The ultimate determination of financial feasibility of any proposed subdivision development is whether the present value of the anticipated income stream over time exceeds the cost to create (including raw land value) by a sufficient amount to attract equity capital and profit to the development. Overall, a well-planned single-family subdivision is believed to be a financially feasible undertaking in the prevailing market conditions. Several existing and new single-family subdivisions are located within close proximity. However, market absorption will also need to be considered.

Maximally Productive: Under present land zoning and adjacent residential development, the most probable use of the property is residential development.

Most probable buyer/tenant: The most probably buyer/tenant for Parcel B is an investor/developer interested in acquiring and developing the property into a residential subdivision and selling the lots for profit. Other potential uses could be for commercial, recreational, or conservation.

Current Revenue: None

Tier Category: Tier II – Probable Transition

Parcel C - White Pine

Legally Permissible: Parcel C is currently located in McCall's Low Density Residential ("R4") zoning designation. R4 restricts development of property to low-density single-family residential neighborhoods with a maximum density of four dwelling units per acre. The Department preliminary platted and recorded the White Pine Heights Subdivision in 2014. Considering the City's R4 zoning allows a maximum density of four dwelling units per acre, a conceptual development plan would be needed to further subdivide the larger lots and blocks into smaller residential lots to maximize returns and to be concurrent with local zoning. Currently, the property is not incorporated within McCall, and after discussions with McCall staff, it would be beneficial for McCall and the Department to annex the entire 56.81-acre aggregate tract before platting. A conceptual development plan has not been performed.

Physically Possible: Parcel C is irregularly shaped, somewhat like a boot, and consists of five preliminary lots ranging in size (18.3 acres, 8.99 acres, 0.62 acres, 0.59 acres, 25.31 acres), for a combined size of 56.81 acres (excluding the roads from White Pine Heights Subdivision Plat). The site topography is gentle to flat, conducive for residential construction. Currently, water is available with the potential to tap into Payette Lakes Water and Sewer District ("PLWSD") sewer. The Department is not aware of concerns that PLWSD is at capacity in the immediate area. Access is a triad of roadways including Miles Standish Road, Pilgrim Cove Road, and John Alden Road with other ancillaries to the lake (Water Lily Lane and Plymouth Road).

Financially Feasible: The ultimate determination of financial feasibility of any proposed subdivision development is whether the present value of the anticipated income stream over time exceeds the cost to create (including raw land value) by a sufficient amount to attract equity capital and profit to the development. Based upon typical auction lot absorption periods, the property's neighborhood represents an average supply of potential inventory. Overall, a well-planned single-family subdivision may be a financially feasible undertaking in the prevailing market conditions. However, several existing and new single-family subdivisions are located within close proximity.

Maximally Productive: Under McCall's current zoning regulations and in light of development trends located in the immediate neighborhoods, the most probable development of the property is single-family residential development.

Most probable buyer/tenant: The most probable buyer is an investor/developer interested in acquiring and developing the property into a residential subdivision and selling the lots for profit.

Current Revenue: None

Tier Category: Tier II – Probable Transition

Parcel D - Lick Creek

Legally Permissible: Parcel D is currently located in McCall's Low Density Residential ("R4") zoning designation. R4 restricts development of property to low-density single-family residential neighborhoods with a maximum density of four dwelling units per acre. The Department preliminary platted and recorded this parcel as part of the White Pine Heights Subdivision along with Parcel C. Currently the property is not incorporated within McCall. It would be beneficial for McCall to annex the entire 30-acre parcel (aggregate parcel). A conceptual development plan has not been performed.

Physically Possible: Parcel D is located to the south of Parcel C in an area designated residential, close to Payette Lake and near the McCall public golf course. Primary access is from Lick Creek Road, Pilgrim Cove Road, and Miles Standish Road. The shape is somewhat rectangular with road frontage, width, and depth to allow for residential uses. The site topography is gentle to flat, thereby beneficial for residential use. Public water and sewer are available to the property from Miles Standish Road.

Financially Feasible: The feasibility determination of any proposed subdivision development is whether the present value of the anticipated income stream over time exceeds the cost to create (including raw land value) by a sufficient amount to attract equity capital and profit to the development. Based upon typical auction lot absorption periods, the property's neighborhood represents an average supply of potential inventory. Overall, a well-planned single-family subdivision may be financially feasible in the prevailing market conditions. Several existing and new single-family subdivisions are located within close proximity.

Maximally Productive: Under McCall's zoning regulations and adjacent residential development, the most probable use of the property is single-family residential development.

Most probable buyer/tenant: An investor/developer interested in developing the property into a residential subdivision and selling the lots for profit. Other potential uses could be for recreational or conservation.

Current Revenue: \$10,850 from a Communication Site Lease.

Tier Category: Tier III – Feasible Transition.

Parcel E - Eastside Drive

Legally Permissible: Parcel E is currently located in McCall's Rural Residential ("RR") zoning designation. RR restricts development to a density of one dwelling unit per ten acres. Currently the property is not incorporated within McCall. A boundary survey or conceptual development plan has not been performed.

Physically Possible: Parcel E is approximately 160 acres with Eastside Drive bordering the property along the western edge. Fall Creek Road is the access from the south that splits in a "Y" shape and extends through the northeastern portion of the property. The site is irregularly shaped with heavy tree cover. Parcel E is large enough to accommodate many uses. The topography varies from 5,258 feet to 5,086 feet generally sloping towards the lake. Sewer and electricity are available at Eastside Drive; however, they have not been extended onto the parcel.

Financially Feasible: The current zoning allows for single-family residential use with ancillary improvements including garage, storage buildings, guest cabin, boathouse, etc. The highest and best use is for development to the maximum density allowed under current zoning, which is one residential building site or three dwelling units per 10-acres (roughly residential 15 lots). The feasibility of any proposed subdivision development is whether the present value of the anticipated income stream over time exceeds the cost to create (including raw land value) by a sufficient amount to attract equity capital and profit to the development.

Maximally Productive: Under McCall's current zoning, the most probable development of the property is single family residential development.

Most likely buyer/tenant: An investor/developer interested in developing the property into a residential subdivision and selling the lots for profit. Other potential uses could be for commercial, recreation, or conservation.

Current Revenue: \$14,167 from Timber Sales, Grazing, and a Commercial Recreation Lease.

Tier Category: Tier III – Feasible Transition.

Parcel F - Shellworth Island

Legally Permissible: Parcel F is located in McCall's Rural Residential ("RR") zoning designation. RR restricts development to a density of one dwelling unit per ten acres. The Department has a preliminary plat that has not been recorded. A conceptual development plan has not been completed. However, given the total acreage is 13.13, only one residential unit would be legally permissible

Physically Possible: Parcel F is an island; therefore, there is no road frontage or wheeled vehicular access, and access is via boat only. There are seasonal limitations for boat only access given lake levels, lake freezing, etc.

The topography of the property is predominantly level with the central portions raising approximately 50 feet. The property has knoll like characteristic which rise from the lake on both the south and west sides, with rocky hillsides. The western shoreline is exposed granite, which limits or prohibits use. The south portion of the shoreline has a small cove-like feature, with a rocky and sandy shoreline/beach area. The approximate shoreline is 3,699 linear feet with native ground cover (as opposed to development challenges due to rock outcroppings). The island has moderate tree coverage.

There are no public utilities known to serve the property. Any development requiring water and waste will require lake water extraction and decomposing septic systems.

Financially Feasible: The zoning limits the use to a single residential unit with ancillary improvements including garage, storage buildings, guest cabin, boathouse, etc. The site is physically capable of providing for residential use but with limitations due to the exposed bedrock and limited access to utilities. Uses are expected to be seasonal due to winter conditions and lack of road access. However, when the lake freezes over access from the mainland using snowmobiles may be a possibility but that is not a reliable and consistent means of access.

Maximally Productive: The property's highest and best use is as a single residential unit together with ancillary improvements. However, it is worth noting that this property has high recreational value that could provide for alternative or additional revenue.

Most likely buyer/tenant: Potential uses could be for recreational, residential, or for conservation.

Current IDL Revenue: \$11,070 from a Residential Lease.

Tier Category: Tier II – Probable Transition.

Parcel G – East Shoreline

Legally Permissible: Parcel G is currently located in McCall’s Rural Residential (“RR”) zoning designation. RR restricts development to a density of one dwelling unit per ten acres. Currently the parcel is not incorporated within McCall. A boundary survey or conceptual development plan has not been performed to maximize current zoning density. Parcel G is currently vacant and unimproved.

Physically Possible: Parcel G has 3,100 lineal feet of shoreline and a general east to west slope towards the lake. The tract is elongated and irregularly shaped with a “neck” near the central portion of the property. Access is off of Eastside Drive. Utilities consist of electricity, telephone, cable service, and limited access to PLWSD’s sewer.

Financially Feasible: The zoning limits use to single-residential with ancillary improvements including garage, storage buildings, guest cabin, boathouse, etc. The highest and best use is for development to the maximum density. The feasibility of any proposed development is whether the present value of the anticipated income stream over time exceeds the cost to create (including raw land value) by a sufficient amount to attract equity capital and profit to the development.

Maximally Productive: The property’s highest and best use is as a single residential unit together with ancillary improvements. However, it is worth noting that this property has high recreational value that could provide for alternative or additional revenue. Additionally, there is endowment land adjacent to Parcel G that will need to be considered with any proposed use.

Most likely buyer/tenant: Potential uses could be for recreational, residential, or for conservation.

Current IDL Revenue: None

Tier Category: Tier III – Feasible Transition

Parcel H - East of Eastside Drive to Tip

Legally Permissible: Parcel H is located in McCall's Rural Residential ("RR") zoning designation. RR restricts development to a density of one dwelling unit per ten acres. Currently, the property is not incorporated within McCall. A boundary survey or conceptual development plan has not been performed.

Physically Possible: Parcel H is approximately 1,040 acres with shoreline development potential which could be increased significantly if Eastside Drive was relocated inland from its current location. Electric and sewer utilities are available but would have to be extended. Additional sewer capacity would most likely require upgrading the line to accommodate increased density.

The topography of the property at its steepest points has building limitations. Typical topographic issues include slope, waterfront qualities, lake depth qualities, and overall usability. However, recreational cabin site owners tend to build on this type of challenging topography to protect their lake front view. The property is irregularly shaped; however, it is large enough to accommodate many uses. Access is off of Eastside Drive. Physical limitations may be present including areas containing hard rock.

Financially Feasible: Parcel H will require city approval, surveying, platting, feasibility studies, subdivision analysis, and other development due diligence. Some of the steeper property may not be suited for cabin site development. Portions of the property are leased for grazing and mineral extraction. Recreational, conservation, and residential uses coupled with additional timber sales and grazing leases could be financially feasible.

Maximally Productive: Parcel H has unique characteristics including lake frontage, lake views, appealing aesthetics, and recreation. There are also conservation, timber sales, and grazing lease opportunities. The maximum productivity of each individual site would be the ability to incorporate residential and recreational aspects of land use.

Most probable buyer/tenant: Potential uses could be for recreation, residential, or for conservation.

Current IDL Revenue: \$48,739 from Timber Sales, Grazing, and Mineral Leasing.

Tier Category: Tier IV – Transition Not Planned.

Parcel I - Tip

Legally Permissible: Parcel I is currently located in McCall's Rural Residential ("RR") zoning designation. RR restricts development to a density of one dwelling unit per ten acres. Currently, the property is not incorporated within McCall. A boundary survey or conceptual development plan has not been completed.

Physically Possible: Parcel I is located adjacent to Ponderosa State Park, which is a public recreation area occupying the meandering inlet of the Payette River and the northern extremity of Payette Lake. Access is off of Eastside Drive and Warren Wagon Road. The property size is approximately 2,040 acres. The steepest portions of the property may have building limitations. Western elevations rise 500 feet and are heavily timbered. Typical topographic issues include slope and overall usability. The property is rectangular shaped, however, is large enough to accommodate many uses. The property does not have lake frontage. Certain higher elevations have lake views.

Financially Feasible: The steep nature of portions of the property may not be suited for cabin site development. Currently, the property is leased for grazing and mineral extraction.

Maximally Productive: Parcel I has unique characteristics including lake views, appealing aesthetics, and recreation. There are also conservation, timber sales, and grazing lease opportunities. The maximum productivity of each individual site would be the ability to incorporate residential and recreational aspects of land use.

Most probable buyer/tenant: Potential uses could be for recreation, residential, or for conservation.

Current IDL Revenue: \$28,257 from Timber Sales, Grazing, Mineral, Noncommercial Recreation Leasing.

Tier Category: Tier IV – Transition Not Planned.

Parcel J - Northwest Warren Wagon

Legally Permissible: Parcel J is currently located in McCall's Rural Residential ("RR") zoning designation. RR restricts development to a density of one dwelling unit per ten acres. Currently, the property is not incorporated within McCall. A boundary survey or conceptual development plan has not been performed.

Physically Possible: Parcel J is approximately 380-acres of wooded timberland. Electric is available but would have to be extended. The topography of the property at its steepest points has building limitations. Typical topographic issues include slope, waterfront qualities, lake depth qualities, and overall usability. However, recreational cabin site owners tend to build on this type of challenging topography to protect their lakefront view. The property is irregularly shaped; however, it is large enough to accommodate many uses. Access is off of Warren Wagon Road.

Financially Feasible: Values for residential leases, private cabin sites, and recreational uses exceed those prices warranted for agricultural or forest land. Based increased community development and high demand for lake front property, recreation, conservation, and residential uses coupled with additional timber sales and grazing leases could be financially feasible.

Maximally Productive: Parcel J has unique characteristics including lake views, appealing aesthetics, and recreation. There are also conservation, residential, and recreation lease opportunities. The maximum productivity of each individual site would be the ability to incorporate residential and recreational aspects of land use.

Most probable buyer/tenant: Potential uses could be for recreation, residential, or for conservation.

Current IDL Revenue: \$28,135 from Timber Sales and a Grazing Lease.

Tier Category: Tier IV – Transition Not Planned.

Parcel K - Syringa Park

Legally Permissible: Parcel K is located in McCall's Low Density Residential ("R4") zoning designation. R4 restricts development to low-density single-family residential, with a maximum density of four dwelling units per acre. A subdivision in this zoning designation would likely consist of larger single-family home sites. A conceptual development plan would need to be provided to develop a more comprehensive understanding of what would be legally permissible on this site. The parcel is part of the platted and recorded Syringa Park Subdivision. Further subdivision is needed to maximize the density of Parcel K.

Physically Possible: Parcel K is 3.58 acres of vacant non-lakefront property surrounded by leased and deeded quarter-acre cottage sites in the Syringa Park Subdivision. The terrain is generally level and varies with drainage easterly to the lake. Access is off of Warren Wagon Road with Syringa Way and Payette Drive as ancillary roads. Utilities are available in the area. Parcel K is triangular; however, it is large enough for single-family residential use.

Financially Feasible: The current zoning limits the use to single-residential with ancillary improvements such as garage, storage buildings, guest cabin, boathouse, etc. The highest and best use is for development to the maximum density allowed under current zoning.

Maximally Productive: Under the City's current zoning regulations and in light of development trends located in the immediate neighborhoods, it is concluded the most probable speculative development of the property is for single family residential subdivision development with allowable density restriction.

Most probable buyer/tenant: A potential buyer is an investor/developer developing the property into a residential subdivision and selling the lots.

Current IDL Revenue: None.

Tier Category: Tier I – Planned Transition.

Parcel L – Southwest Warren Wagon

Legally Permissible: Parcel L is currently located in McCall’s Rural Residential (“RR”) zoning designation. RR restricts development to a density of one dwelling unit per ten acres. Currently, the property is not incorporated within McCall. A boundary survey or conceptual development plan has not been performed. The property has lake frontage along the west side of Payette Lake.

Physically Possible: Electric is available, however, would have to be extended throughout the parcel. The topography of the property at its steepest points has building limitations but offers great views. The property is generally a bench sloping towards the lake with moderate elevation change. The parcel is irregularly shaped, but large enough to accommodate many uses. Access is off of Warren Wagon Road. The property’s size is approximately 1,520 acres of wooded timberland.

Financially Feasible: While vacant land remains at high demand for residential and recreational use, the size of this property requires significant due diligence including city approvals, surveying, platting, feasibility studies, and subdivision analysis. The Value of residential leases, private cabin sites, and recreational uses exceed that of agricultural or forest land uses. Recreation, residential, timber sales, and grazing leases would be financially feasible.


Maximally Productive: Parcel L has unique characteristics including lake views, appealing aesthetics, and recreation. There are also conservation, residential, and recreation lease opportunities. The maximum productivity of each individual site would be the ability to incorporate residential and recreational aspects of land use.

Most probable buyer/tenant: A potential buyer is an investor/developer developing the property into a residential subdivision and selling the lots. Potential uses could also be for recreation, residential, or for conservation.

Current IDL Revenue: \$98,637 from Timber Sales, Grazing, Mineral, Commercial Recreation Leasing.

Tier Category: Tier IV – Transition Not Planned.

Parcel M - Cougar Island

Legally Permissible: Parcel M is located in McCall's Rural Residential ("RR") zoning designation. RR restricts development to a density of one dwelling unit per ten acres. The Department preliminary platted and recorded the Cougar Island Subdivision, which includes five residential lots; one of which is improved and currently leased. McCall staff have indicated the lots are non-conforming to the current RR zoning designation. However, the five lots are buildable tracts, which cannot be further subdivided. The Conditions, Covenants & Restrictions (CC&Rs) prohibit further subdivision as well. McCall staff explained there are no prohibitions on obtaining a building permit  for any of these lots and, should a structure be destroyed or demolished, there is no prohibition upon re-building. Therefore, the key point here is compliance with the current zoning and CC&Rs.

Physically Possible: Parcel M is an island and accessible by boat only. In addition, boat access is seasonal due to ice and lake levels during the winter months. The site reflects a knoll characteristic which rises from the lake on all sides with basalt hillsides. The total aggregate size is 14.21 acres with the combination of five platted lots: 3.47, 2.52, 2.94, 3.35, and 1.93 acres all with a mixture of lake frontage containing 4,320 linear feet of shoreline. There are no known characteristics that would eliminate the legally identified use of the property with the exception of limited desirable septic drainfield locations. There has been a classification of the site qualities which includes size, waterfront, if any, topography, ground cover, access, soils (as pertinent primarily where the site might have development challenges due to rock outcroppings).

Financially Feasible: The zoning and the CC&Rs limit use to single-residential with ancillary improvements including garages, storage buildings, guest cabins, boathouses, etc. The site is physically capable of providing for the use but with limitations due to the exposed bedrock characteristics. Uses are expected to be seasonal due to winter conditions and the lack of road access. However, when the lake freezes over access from the mainland may be possible but that may not be a reliable and consistent form of access. The property has a highest and best use for five single-residential units together with ancillary improvements.

Most probable buyer/tenant: Potential uses could be for recreational, residential, or for conservation.

Current IDL Revenue: \$32,440 from a Residential Lease.

Tier Category: Tier I – Planned Transition.

Appendix II –Transition Lands Parcel History

Parcel A - Dienhard Commercial

Parcel A is held by the Public School Endowment and was part of the original endowment granted to the State.

Parcel B - Dienhard Residential

Parcel B is held by the Public School Endowment and was part of the original endowment granted to the State.

Parcel C - White Pine

Parcel C is held by the Normal School Endowment and were selected by the State as *in-lieu* lands as part of the Idaho Admission Act.

Parcel D - Lick Creek

Parcel D is held by the Hospital South Endowment and was conveyed to the State in 1989 as part of a land exchange by William and Anna Tuller, and Bill and Katherine Chronic.

Parcel E - Eastside Drive

There are two sub-sections that make up Parcel E. 44.5 acres are held by the Hospital south Endowment and was conveyed to the State in 1989 by William and Anna Tuller, and Bill and Katherine Chronic. The remaining 120 acres of Parcel E are held by the Normal School Endowment and was acquired through purchase and conveyance by the Boise Payette Lumber Company in 1939.

Parcel F - Shellworth Island

Parcel F is held by the Public School Endowment and was part of the original endowment granted to the State.

Parcel G - East Shoreline

Parcel G is held by the Normal School Endowment and was selected by the State as *In-lieu* lands as part of the Idaho Admission Act.

Parcel H - East of Eastside Drive to the Tip

Parcel I - Tip

Parcel I is held by the State Hospital South Endowment and was selected by the State as *In-lieu* lands as part of the Idaho Admission Act.

Parcel J - Northwest Warren Wagon Road

Parcel J is held by the State Hospital South Endowment and was selected by the State as *In-lieu* lands as part of the Idaho Admission Act.

Parcel K - Syringa Park

Parcel K is held by the State Hospital South Endowment and was selected by the State as *In-lieu* lands as part of the Idaho Admission Act.

Parcel L - Southwest Warren Wagon Road

There are two subsections to Parcel L. 132.58 acres are held by the Public School Endowment and were

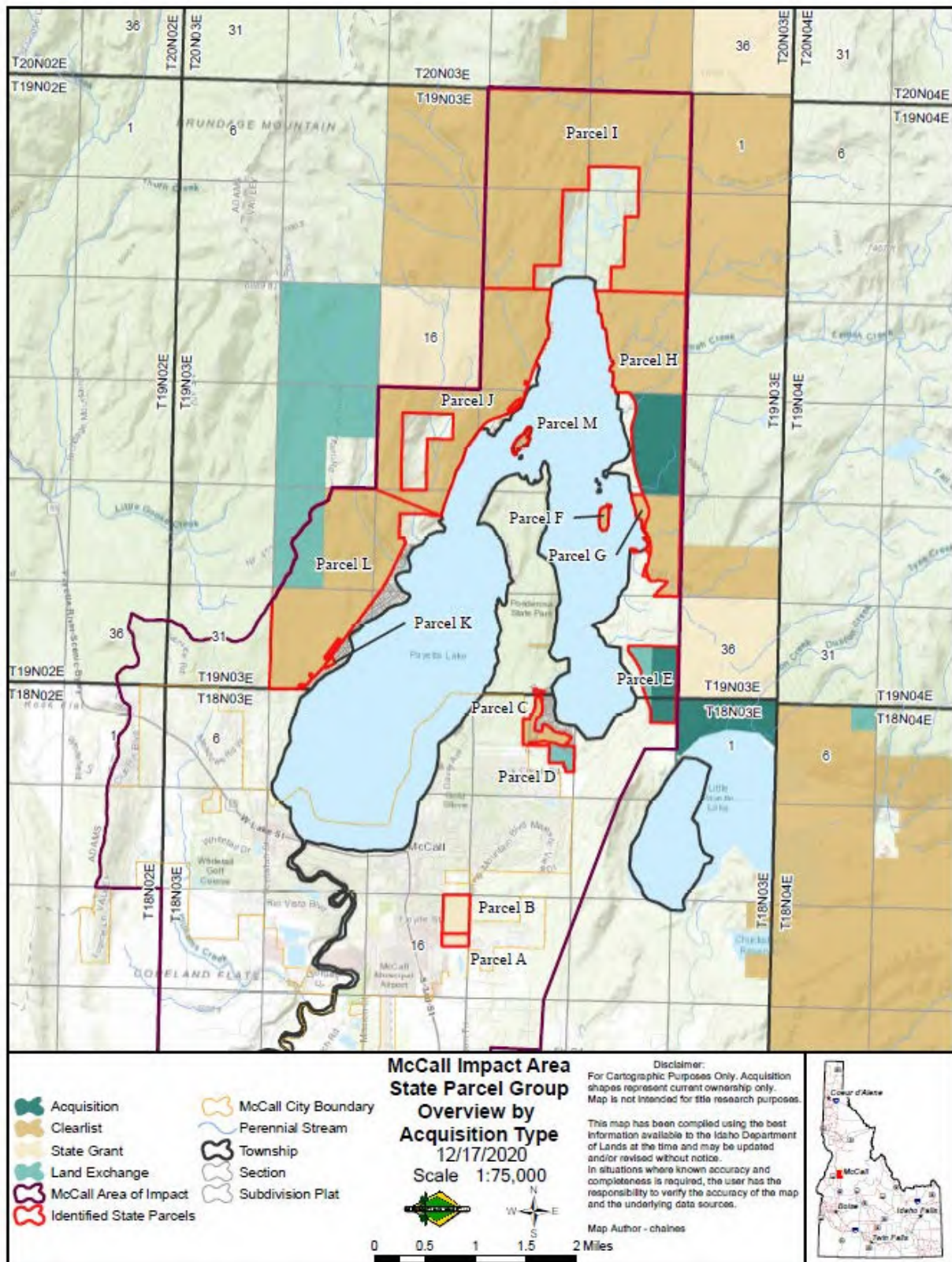
acquired through a land exchange in 2000 with the Bureau of Land Management. The remainder of Parcel L are held by the State Hospital South Endowment and were selected by the State as *In-lieu* lands as part of the Idaho Admission Act.

Parcel M - Cougar Island

Parcel M is held by the Public School Endowment and was part of the original endowment granted to the State.

Transition Lands Parcel History

Appendix III – McCall Parcel Group Overview



From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:56 PM
To: Comments
Subject: Comment Submitted

From: Wendy Ertter at Ertter@gmail.com
Phone: 2088609369
Address: 2015 Hazel Street
City: Boise
State: Idaho
Zip Code: 83702

Comment:
Swapping some of the most prime real estate in Idaho all at once to a single development company does not align with creating the best long term benefits to your stakeholders.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:57 PM
To: Comments
Subject: Comment Submitted

From: Deborah Fereday at
City: McCall
State: Idaho

Comment:

As a local McCall resident, I would like to make these important points after careful review of the PELs:

1. Slow this process down – these distinctive and endeared endowment lands that surround Payette Lake deserve more thoughtful analysis. More time to gather input means more time to collaborate on solutions. Local stakeholders and City and County officials offer expertise regarding place-based solutions while considering the local comprehensive plans that are in place.

2. Preserving the water quality “at the top of the ditch” for downstream users, including thoughtful consideration for climate change impacts. Wildfire prevention and flooding, with overall watershed management are key to cost/benefit analysis. Large scale development of any kind, that would happen on the parcels mentioned in the PELs, those surrounding the lake especially, will threaten water quality and ultimately quality of life in McCall.

3. Continue with a stakeholder advisory group. The Focus Group was a good beginning but ongoing dialogue with experts and locals will ultimately minimize conflict and lead to more sustainable outcomes for the ecology as well as the economy of the area. Payette Lake is the gem of our town. It is the reason many Idahoans come to visit McCall.

2. Creating a win-win scenario for the beneficiaries of the endowment can involve the idea of preservation. This idea is mentioned in the constitution, Article IX, section 8, where the Land Board has discretion to hold any parcel for “protection” and is not required to generate cash from every acre of land. Seek collaboration with locals to find these win-win scenarios. Find new ways to maximize long-term returns for the beneficiaries, not just focusing on short-term revenues.

Deb Fereday
McCall, Idaho

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 3:58 PM
To: Comments
Subject: Comment Submitted

From: Kay Hummel at kayhum@cableone.net
Phone: 208-631-7704
Address: 420 E Crestline Drive
City: Boise
State: Idaho
Zip Code: 83702

Comment:

The creation of Idaho Department of Lands' (IDL) Draft Payette Endowment Land Strategy (PELS) is an initial step although its timetable and phasing raise important questions. This process needs further investigation of irreplaceable resource values, their valuation present and future, including community impacts if they are disposed of in a rapid time frame or in a large, sweeping land trade. The Board should order a full economic and biological analysis of Conservation and Recreation management strategies on the these IDL lands along with sustainable long-term timber management and grazing.

The key IDL parcels on the west and east sides of Payette Lake possess matchless natural resources that directly sustain a vibrant economic life in McCall and adjacent Valley County. Protecting the Payette endowment parcels from inappropriate development is analogous to the concept of "Outstanding Resource Waters" that Idaho recognizes under its water quality rules. These are water sources that, because of the outstanding benefits they provide, deserve the highest protection against impairment. Although such designations presumably would be rare, IDL should establish such a category for those lands with extraordinary inherent values for fisheries, wildlife, and other aquatic biota, for drinking water supplies, for recreation and perhaps especially, to a local economy.

Idaho's Department of Environmental Quality already has deemed the water quality in the Payette River Basin, and in Payette Lake itself as "impaired" under the water quality laws. The Lake and its immediate tributaries, including the North Fork Payette River above the Lake, are subject to binding requirements pertaining to "total maximum daily loads" of pollutants, including things like sediment and nutrients. These requirements are intended to prevent further water quality impairment. The Department of Lands should not propose actions on the public's endowment lands surrounding Payette Lake that would threaten such waters, particularly as these waters are a primary drinking water source and are used for primary contact recreation, fishing, and other beneficial uses.

Our country has recognized the principle that natural resources can have inherent value deserving of protection. This is one reason why federal law allows suits to compensate for "natural resource damage." I urge IDL and the Land Board to find a way to recognize a similar principle in the case of Payette Lake and its surrounding watershed, and to protect this integrated natural resource from further impairment. Therefore, please continue and extend the recent 2020 moratorium on leasing and sales so that (1) an Outstanding Natural Resource Lands status receives thorough investigation and potential designation; (2) develop a business strategy that considers emerging as well as traditional lease revenue opportunities here; and (3) analyze and create mechanisms for perpetual Conservation Management tools that increase asset value and return to the Endowment.

The Idaho Constitution does not mandate that the Land Board is required to sell, lease or exchange any part of its endowment lands at any given time or on a date-certain timetable. Article IX, Section 8 states that the Board has the

duty “to provide for the location, protection, sale or rental” of these lands. Emphasis on “or, meaning that the Board is entitled to sell or lease, OR hold lands for their inherent protection.

The Land Board should be wary of making decisions at the behest of any private entity or investment group. It should not, in effect, partner with any such group based on a promise of financial return or the supposed performance of a public asset. Parcels E, F, G, H, I J, L and M should not be disposed or exchanged at this juncture, especially without the State first designing a business strategy for new businesses and long-term Conservation Easement tools that potentially can bring substantial revenue to the Endowment.

We look to the Land Board to employ true wisdom, looking to the interests of grandchildren, great-grandchildren, in having places like Payette Lake and its surrounding watershed as a source of pride and enduring economic benefit. I ask that you not embark on a course that would make the place one that welcomes only the elite. In short, the State and the local community and its frequent visitors, currently are sustained by the magnificent crown jewels along Payette Lake’s shores and the watershed resources (many at risk) in the adjacent endowment parcels. –

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 4:00 PM
To: Comments
Subject: Comment Submitted

From: Wendy Ertter at Ertter@gmail.com
Phone: 2088609360
Address: 2015 Hazel Street
City: Boise
State: Idaho
Zip Code: 83702

Comment:

Swapping some of the most prime real estate all at once surrounding McCall to a single development group does not create the best long term benefit for your stakeholders. This is not a good plan for McCall or for any of the surrounding communities that value McCall for the recreation & wildlife opportunities this open land creates.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 4:09 PM
To: Comments
Subject: Comment Submitted

From: Kimberly Apperson at kimapperson@icloud.com
Phone: 208-630-4776
Address: 415 South Samson Trail
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Dear Governor Little and the Idaho State Land Board,

Thank you for developing the draft Payette Endowment Lands Strategy and making it available for public comment. It is informative to see this accounting of IDL Endowment lands in the the McCall area. I view this as a start to what I hope is a transparent and open public discussion about the future of these lands. I urge you to continue the moratorium on any new leases or changes in management while you develop options for establishing conservation easements on many of these parcels. Maintaining these lands under State ownership as open space for traditional commercial uses (i.e., timber, grazing), as well as for wildlife, watershed health and recreation is invaluable and irreplaceable once sold to private enterprise. Conservation easements can be a winning choice for all of us, including the endowment funds. Developing strategies may be unique to each parcel and will take some time and must include all stakeholders.

Please do not rush to decisions to sell or develop any of the parcels described in the PELS.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 4:13 PM
To: Comments
Subject: Comment Submitted

From: Bruce Smith at bms2650@gmail.com
Phone: 2088050133
Address: 2809 s shadywood way
City: Boise
State: Idaho
Zip Code: 83716

Comment:

To all who provided comments on the PELS:

As a follow up to my earlier comments, I believe the proposal incorporated in the previous applications filed by PC Partners reflect the objectives many of you have focused on— protecting endowment lands, providing public access, and helping the endowment by generating needed revenue. For parcel G and Shellworth this would include some yurts for glamping and conservation easement goals for the unused areas. I would hope when the time comes, you would consider providing support for PC Partner's approach. Thanks

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 4:14 PM
To: Comments
Subject: Comment Submitted

From: Kip & Cheryl Runyan at krunyan50@aol.com
Phone: 2084842186
Address: 14198 Hancock Rd
City: McALL
State: Idaho
Zip Code: 83638

Comment:

I ask the board to develop a Conservation Easement Option when determining how to manage state lands and that you extend the moratorium to allow sufficient time to develop this option. When land is purchased at fair market value and put into a conservation easement this will generate revenue for the endowment through encouraging recreation uses and wildlife opportunities that bring money and people into these neighboring communities. The value of recreation is increasing exponentially in the Western states and should be factored into the decision process when determining what is the best use of land. The state should complete a study to determine the economic impacts from recreation on other nearby states including: Oregon, Washington, Montana, Wyoming, Utah, Colorado etc.. A properly developed model (this will have to be completed at some point) for McCall will benefit other communities across the State as well, to accurately monetize the impact recreational opportunities have on surrounding towns and the State of Idaho. Lastly, conservation easements can also be written to allow for traditional uses, such as timber and grazing, thus keeping the land in the Endowment portfolio and allowing for continued revenue.

From: Tammy Armstrong
Sent: Tuesday, March 2, 2021 6:06 AM
To: Susan E. Buxton
Cc: Dustin Miller; Anna Canning; nate.fisher@gov.idaho.gov; Sam Eaton (sam.eaton@gov.idaho.gov); Renee Jacobsen; Kellie LaBonte
Subject: FW: IDPR PELS Comment Letter
Attachments: IDPR PELS comment letter 3.1.21 signed SEB.pdf

Good afternoon Ms. Buxtonr:

Thank you for submitting your comments. I am forwarding your attachment to Renee Jacobsen and Kelli LaBonte as they are the individuals that are overseeing the comments through our on-line process.

Regards,

Tammy Armstrong

Tamara L. Armstrong
Real Estate Program Specialist

Idaho Department of Lands
300 N 6th Street, Suite 103
Boise, ID 83702
208-334-0215

From: Susan E. Buxton <Susan.Buxton@dhr.idaho.gov>
Sent: Monday, March 1, 2021 4:39 PM
To: Tammy Armstrong <tarmstrong@idl.idaho.gov>
Cc: Dustin Miller <dmiller@idl.idaho.gov>; Anna Canning <Anna.Canning@idpr.idaho.gov>; Nate Fisher <Nate.Fisher@gov.idaho.gov>; Sam J. Eaton <Sam.Eaton@gov.idaho.gov>
Subject: IDPR PELS Comment Letter

Ms. Armstrong-

Thank you for you assistance with all of the meetings. I am very appreciative of your time and attention. Please see the attached IDPR comment letter.

Susan

Susan E. Buxton
Administrator DHR and Director IDPR
304 North 8th Street
P.O. Box 83720
Boise, Idaho 83720-0066
(208) 854-3075 (direct)
Susan.Buxton@dhr.idaho.gov



Dustin Miller, Director
Idaho Department of Lands
Via email: tarmstrong@idl.idaho.gov

Brad Little
Governor

Susan E. Buxton
Director

.....
**IDAHO PARK AND
RECREATION BOARD**
.....

Doug Eastwood
District One

Randy Doman
District Two

Brian Beckley
Board Chair
District Three

Cally Roach
District Four

Pete J. Black
District Five

Louis Fatkin
District Six

.....
DIRECTOR'S OFFICE
.....

5657 Warm Springs Avenue
P.O. Box 83720
Boise, Idaho 83720-0065

Phone (208) 334-4199

www.parksandrecreation.idaho.gov

Dear Director Miller:

This letter is the formal comment letter from the Idaho Department of Parks and Recreation (IDPR) on the proposed Payette Endowment Lands Strategy dated December 2020 (PELS).

Thank you for the opportunity to be a part of the focus group for this important discussion. It was heartening to hear the collective dedication of the focus group members to preserve the recreation and open space opportunities in the areas surrounding Payette Lake. Those sentiments align with our mission to improve the quality of life in Idaho through outdoor recreation and resource stewardship.

IDPR appreciates the time and attention that Department of Lands staff took in explaining the limitations and complexity of land exchanges and dispositions by the Land Board. As the experts in those matters, we trust that the Department of Lands staff will consider the intent and desires of the focus group members and find a creative solution that meets the fiduciary requirements of the Land Board.

IDPR offers its assistance evaluating the recreation value of land exchanges near any of our state parks. As an example of the valuation information IDPR tracks, a study was commissioned to the Boise State University Department of Economics on the "Economic Impact and Importance of State Parks in Idaho: A Park-Level Study." IDPR updated that study in January 2018 which concluded, statewide, that visitors to Idaho State Parks spent a total of \$127.1 million for food at grocery stores, restaurant meals, fuel, lodging, other retail, recreation, and medical expenses.

IDPR also encourages IDL to consider the cumulative impact of disposing small parcels which could diminish the continuity (and therefore quality) of recreation spaces.

Again, we appreciate the opportunity to work with your staff on this tremendous opportunity to recognize the importance of outdoor recreation to the state of Idaho. Please feel free to contact me with any questions or concerns.

Sincerely,



Susan Buxton, Director
Idaho Department of Parks and Recreation

SEB: abc

Cc: IDPR Board
Sam Eaton, Office of the Governor
Nate Fisher, Office of the Governor

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 4:46 PM
To: Comments
Subject: Comment Submitted

From: Renee, Mark Lothrop at lothrop2@yahoo.com
Phone: 2089891204
Address: 225 NW CARRIE CIR
City: MOUNTAIN HOME
State: Idaho
Zip Code: 83647

Comment:

We are writing this letter to encourage you to consider the impacts of the sale or exchange of the land in and near McCall. The pristine Payette Lake offers so many opportunities for all Idahoans and their children to enjoy the outdoor activities it has to offer.

In keeping with the education of the children of Idaho, to explore the outdoors with hiking, swimming, fishing, mountain biking, skiing and just learning about nature is an important part of their education too. Once these wonderful ties to nature have been sold they are gone forever and only a hand full of owners will be able to enjoy.

The Ponderosa State Park is a very successful park which invites all to enjoy not just a few. Most areas around the lake have been locked up by private owners and businesses and have limited areas for all to access. Let's consider keeping some of this area as part of our state park system instead of privatizing these areas. Remember, one of the reasons for the growth in Idaho is the access to large tracts of public land.

Why not develop some more areas around the lake for all to recreate and use. Make the profit for the schools by allowing the state park to develop more access to the lake edges. With the population of Boise and the west exploding we feel this will generate funds for schools as well as provide an important outdoor education to the children of Idaho. Idaho does not have many Lakes like the Payette; why not promote it for a recreation use for all. The exchange of land for timber in northern Idaho is an unreasonable plan.

We have worked, played and own a home in McCall and want as much of the beautiful McCall to stay intact and protected as long as possible for future generations. Please take time and consider your decision for the sake of McCall and the future of our children.

We are not in favor of several hundred mansions around the lake. One thing for sure, only the very wealthy will end up owning most of it.

Thank you for your time and consideration,

Renee Lothrop

Mark Lothrop

From: Randy Fox <rfox@idahoconservation.org>
Sent: Monday, March 1, 2021 4:54 PM
To: Comments
Subject: ICL PELS comments
Attachments: IDL Payette Endowment Lands Comments 2_2021.pdf

Dear IDL staff,

Please accept the attached document which contains the Idaho Conservation League's comments on the Payette Endowment Lands Strategy. If you have any questions or concerns regarding these comments and recommendations, please do not hesitate to contact either myself, Jonathan Oppenheimer, or John Robison using our included information.

Sincerely,

--

Randy Fox
He/Him/His ([What's This?](#))
Conservation Associate
Idaho Conservation League
PO Box 844, Boise, ID 83701
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March 1, 2021

Idaho Board of Land Commissioners, Governor Brad Little, Chair
% Director, and Secretary to the Board, Dustin Miller
Idaho Department of Lands
300 N. 6th St., Suite 103
Boise, ID 83702
(208) 334-0200

Submitted Electronically via IDL Payette Endowment Lands Comment Portal

RE: Idaho Conservation League's Comments Regarding the Idaho Department of Lands Payette Endowment Lands Strategy

Dear Governor Little and Members of the Idaho Board of Land Commissioners:

We appreciate the opportunity to submit comments to the Idaho Board of Land Commissioners (IBLC) and the Idaho Department of Lands (IDL) regarding the Payette Endowment Lands Strategy, which centers on State Endowment Lands in and around McCall, Valley County, Idaho. Since 1973, Idaho Conservation League (ICL) has worked to protect and enhance Idaho's clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. Idaho Conservation League has a long history of involvement in public land management issues. As Idaho's largest statewide conservation organization, ICL represents over 30,000 supporters who have a deep personal interest in ensuring that public lands management decisions protect our quality of life, our land, water, fish, and wildlife, and the communities that depend on these resources.

The Idaho State Endowment Lands which surround McCall's Payette and Little Payette Lakes hold a special place in Idahoan's hearts by providing numerous recreation opportunities for local residents and visitors, protecting water quality, and promoting an ecosystem rich with biodiversity which supports numerous wildlife and plant species. These largely contiguous parcels contain a mosaic of developed (primarily trails, roads, and some commercial leases) and

undeveloped lands also contribute to the character of the community and are an integral part of why this area is so special.

The following document presents our comments and recommendations regarding the Payette Endowment Land Strategy (PELS), and includes several potential solutions regarding the management of State Endowment Lands for the benefit of all Idahoans and to ensure the water that McCall and Valley County residents depend on remains clean and healthy for human and wildlife consumption. Thank you for considering our comments as the Idaho Board of Land Commissioners and the Idaho Department of Lands seek to find the best path forward for IDL, McCall residents, and the rest of Idaho. Should you have any questions regarding these recommendations, please do not hesitate to contact us.

In addition to the PELS, Trident Holdings, LLC is developing a proposal to exchange some 17,000 acres of State Endowment Lands in the McCall area for approximately 21,000 timberland acres in north Idaho. This proposal has engendered significant concern and has brought light to the importance of Idaho's Endowment Lands within and surrounding this community. Trident promotes their proposal as a mechanism to "Preserve McCall" through targeted development of highly desirable residential and commercial sites while promoting "improved public access" and the ability to conserve undeveloped lands in perpetuity. We are concerned that the speculative nature of privatization and subsequent development of these lands will threaten the lands and waters many Idahoans know and love, adversely impact the quality of life, recreation opportunities, plant and wildlife populations, limit land management options, restrict future Land Board discretion, and threaten water quality which all residents and visitors to Payette Lake and the North Fork Payette depend upon. This privatization will diminish opportunities for recreation and sustainable activities such as hunting, fishing, and gathering the abundant natural yields of these forested Endowment Lands. The Idaho Conservation League believes that meaningful conservation, recreational access and sustainable economic development need not depend on luxury homes or resort hotels along the lakeshore.

Separate and apart from the Payette Lands Strategy, we strongly encourage the Idaho Land Board to discuss and evaluate strategies regarding the \$140+ million in the Idaho Land Bank which is available for acquisition. While we recognize that the Strategic Reinvestment Committee identified options with regards to the allocation of those dollars, we feel strongly that instead of disposal of lands, the Land Board should prioritize the allocation and expenditure of the Land Bank, before considering further disposal.

Respectfully submitted,



John Robison
Public Lands Director
Idaho Conservation League
jrobison@idahoconservation.org
(208) 345-6933 x 113



Randy Fox
West Central Idaho Conservation Associate
Idaho Conservation League
rfox@idahoconservation.org
(208) 345-6933 x 110



Jonathan Oppenheimer
External Relations Director
joppenheimer@idahoconservation.org
208-345-6933 ext. 126

Idaho Conservation League's Comments on the Idaho Department of Lands Payette Endowment Lands Strategy

Regardless of the path Idaho Department of Lands (IDL) and the Idaho Board of Land Commissioners (aka Land Board) chooses to address the future of the Payette Endowment Lands, the implications will be felt for centuries across Endowment Lands throughout the state. The decisions made today will have long-reaching effects into the future. Therefore, we recommend that IDL and the Land Board slow down any final decision on the Payette Endowment Lands Strategy (PELS). The PELS Focus Group meetings revealed that there are numerous questions regarding the disposition of these critical lands and that many participants believe the PELS is incomplete and does not represent a finished product or a comprehensive plan. ICL agrees.

Slowing the process would allow for continued conversation and time for local residents and stakeholders to continue working with IDL to identify alternative solutions that both meet the Land Board's fiduciary mandate, along with IDL's needs and those of the residents of McCall, Valley County and concerned citizens from across the state. By slowing the process down, and not immediately deciding the fate of the Endowment Lands in the McCall Impact area at the March 16, 2021 Land Board meeting, the moratorium could be extended on the sale, lease or exchange of Endowment Lands, thereby reducing the pressure on IDL and the Land Board to make rushed decisions that will have long-lasting effects. This would also allow for expanding the conversation and Endowment Lands strategy planning process to expand and include adjacent lands and Endowment Lands throughout the state.

A growing population combined with increasing pressure and interest in outdoor recreation and watershed protection makes certain that these issues will only continue to become more relevant and time consuming as the years progress. IDL now has the opportunity to find 21st Century solutions that carry Idaho forward into the next century and beyond, and ICL encourages the IDL and the Land Board to take full advantage of this unique moment in time to guarantee the financial security of Endowment Land beneficiaries, as well as the protection of water quality and public lands access we all depend upon and enjoy.

Retain Land Connectivity and Ecological Function

We have long recognized that the economic health and viability of rural communities directly correlate with the health of the lands and water that surround them. Ecosystem health becomes more critical and tied to economic health when we acknowledge that the surrounding landscapes and opportunities they offer are the very attributes that attract people to the region for permanent residency, as a second home location, or as a vacation destination. Clean, drinkable water provides the foundation for a strong, healthy, and economically viable community, and the

nation has seen the negative impacts of unhealthy or contaminated water supplies on economic health through the situation in Flint, Michigan, and in other locations throughout the nation. This is especially true for McCall and the health of Payette and Little Payette Lakes, which remain the primary drinking water source for the surrounding communities.

Much of the land surrounding Payette and Little Payette Lakes are Endowment Lands managed by the Idaho Department of Lands (IDL), and stand at the center of the current discussion. While we understand that the State has a constitutional mandate to manage their lands for “maximum long term financial return”, we do not believe that the State can achieve their long-term financial goals if the proposed actions result in ecosystem degradation. Development along the lakeshores has resulted in increased sediment delivery to the lake waters and fragmented plant and wildlife habitats, which has degraded water quality and adversely impacted wildlife security and habitat health. The 1992 asset management plan clearly acknowledges the importance of IDL staff considering the “needs and concerns” of the citizens of McCall and greater Valley County regarding the management and/or disposition of Endowment Lands, and ICL supports McCall and Valley County residents having the opportunity to shape the trajectory and health of their own future. We encourage IDL to seek further opportunities to coordinate with the City of McCall and Valley County residents to conserve lands surrounding critical water bodies, some of which remain a part of IDL’s Public Trust responsibilities, and protect the foundation of McCall’s economic health and security: a sustainable, healthy, and drinkable water source. We address our concerns regarding maintenance of the Public Trust, navigable waters and the *special* Payette Lake Trust obligations below.

The Endowment Lands in and around McCall contain migration corridors and habitats for numerous species, including mule deer, elk, moose, bears, mountain lions, a variety of raptors and migratory songbirds, amphibians, reptiles, and the numerous plants and insects these animals depend on. Maintaining these corridors and habitats is critical to retaining ecosystem health. Further, maintaining intact migration corridors and habitats ensures the animals that attract people to the area for wildlife viewing, hunting, fishing, or gathering remain on the landscape. Having robust wildlife and plant diversity contributes to the economic success of the region by attracting wildlife enthusiasts of all descriptions who support local businesses and contribute to the Endowment via the access agreement between the IDL and the Idaho Department of Fish and Game.

The Payette lakes are also unique in that they are natural bodies of water, unlike the majority of lower-elevation reservoirs found throughout the state. Most of Idaho’s natural lakes are found at higher elevations, reducing accessibility for some and limiting recreation boating opportunities to conveyances that are easily transported. Prior to the construction of Black Canyon diversion dam on the Payette River in 1924, salmon regularly made the journey from the Pacific Ocean to Payette Lake and beyond to spawn. While salmon and steelhead are unlikely to return to the

Payette watershed, numerous fish and other aquatic species continue to thrive in the cold waters of Payette and Little Payette Lakes and in the waters downstream.

In addition to each of the values enumerated above, the connectivity of existing Endowment Lands contributes to their long term value to the beneficiaries. As increased development further divides the Endowment estate, land management options will become more limited and access to ongoing Endowment Lands will be disjoined. Further, the appreciation value of Endowment Lands should be properly accounted for as a part of the overall “returns” to the Endowment and its assets. After all, there is a reason that these lands are so desirable.

Public Access to Endowment Lands

Recent surveys and questionnaires circulated in the Valley County communities by the Payette Land Trust and the Payette Endowment Lands Alliance demonstrate the importance of having accessible public lands within an easily commutable distance, oftentimes using non-motorized methods. Further, these state-managed lands also provide access to federally-managed public lands. The on-going COVID-19 pandemic highlights the importance of accessible public lands for maintaining physical and mental health. Many local residents and visitors spend more time enjoying the Payette Endowment Lands than other portions of the surrounding Payette National Forest. As urban growth and development inevitably occur, it becomes increasingly clear that conserving public access to these Endowment Lands and surrounding federal public lands is vital to the success of rural communities who rely, at least in part, on tourism trade.

We should not consider land access the sole purview or concern of land-based development proposals. Many recreationists come to the area to enjoy the sailing, water-skiing, wake-boarding, paddle boarding, and kayaking opportunities found at Payette and Little Payette Lakes. Exploring tucked away coves and islands and relaxing or picnicking on lakeshore beaches remains a primary attraction for people who come to the region specifically for water-based recreation. Increased development along the lakeshore by either private or commercial ventures could drastically reduce the public access and aesthetic components that make Payette and Little Payette Lakes special and unique. We encourage IDL and the Land Board to advocate for retaining public access and protecting the visual aesthetics of these water-based locations.

Public Trust Lands

The waters of Idaho, including Payette and Little Payette Lakes, the tributaries that feed the lakes, and the North Fork of the Payette River are protected and held in Public Trust by IDL, and the lands below the ordinary high water mark are considered public trust lands. State Public Trust lands are fundamentally different from State Endowment Lands in terms of management and goals. Title to these public trust lands remains with the state and the lands are administered, “for the public benefit rather than for a specific beneficiary.” We are concerned that

privatization of these Endowment Lands will lead to adverse effects on Public Trust Lands, including the nearby waterways and lands below the ordinary high water marks. While the state does have a fiduciary responsibility mandated through the Constitution, the state also holds a responsibility to protect water quality. Several statutes and legislative intent support this perspective.

As early as 1925, Idaho Statute and Code recognized the importance of preserving Payette Lake as a “Health Resort(s) and Recreation” location. Regarding the Appropriation of Waters in Trust for People, Statute 67-4301 states:

The governor is hereby authorized and directed to appropriate in trust for the people of the state of Idaho all the unappropriated water of Big Payette Lake, or so much thereof as may be necessary to preserve said lake in its present condition. The preservation of said water in said lake *for scenic beauty, health and recreation purposes necessary and desirable for all the inhabitants of the state is hereby declared to be a beneficial use of such water.* (emphases added)

Statute 67-4302 declares that the land between the ordinary high and low water mark, as well as “all other lands of the state adjacent to said lake which are not held in trust for the beneficiaries of the endowed institutions” are to be devoted public access and use “in connection with the preservation of said lake in its present condition as a health resort and recreation place” for Idaho citizens. Further, this public use was found to “be more necessary....than the use of said lands as a storage reservoir for irrigation or power purposes.” While our leaders in 1925 could not predict the development value of these lands and waters, they clearly recognized and acknowledged the value of conserving these natural resources for recreation and health benefits for all Idahoans. We believe these early statutes provide the IDL and the diverse stakeholders in the region with the statutory and codified authority to advocate for continued conservation and preservation of these lands for future generations.

The majority of IDL Endowment Lands in the area retain a “timberland” classification, and harvesting timber from these parcels produces funds for state beneficiaries. While IDL does realize financial return from these timberlands, they also serve a primary purpose of watershed protection, by reducing erosion and contributing to the natural filtration system.

Idaho Code 58-133

While the Endowment Lands above the ordinary high water mark do not directly fall into the *Special* Big Payette Lake Trust or the Public Trust Doctrine, the management of these parcels and their overall health maintains a direct duty to maintain, and in fact improve, water quality in Big Payette Lake. In addition to the protection of the state’s trust responsibilities, the preservation and protection of water quality in the lake helps the state meet it’s fiduciary

obligations as well. As water quality is important for communities who depend on surface waters for drinking, irrigation (downstream users), and recreation, so too is it important to the Land Board's long term financial investment in these lands. If water quality suffers, the Endowment's asset will similarly suffer. The lands in question are of high value to numerous parties, *because* they surround a relatively-clean lake, with ample access to the shoreline, public forests and recreational opportunities. The more this landscape erodes, literally and figuratively, the less valuable the remaining asset becomes.

Idaho Statute provides guidance regarding the disposition and acquisition of state lands in Title 58, Chapter 1, 58-133, Acquisition, Sale, Lease, Exchange or Donation of Public Lands - Creation and Operation of Land Bank Fund. Part 1 states:

The state board of land commissioners may select and purchase, lease, receive by donation, hold in trust, or in any manner acquire for and in the name of the state of Idaho such tracts or leaseholds of land as it shall deem proper, and after inventory and classification as provided herein, shall determine the best use or uses of said lands: **provided however, that all state owned lands classified as chiefly valuable for forestry, reforestation, recreation and watershed protection are hereby reserved from sale and set aside as state forests** (emphasis added).

Statute 58-133 clearly indicates that IDL and the Land Board have a responsibility to retain lands having recognized valuable characteristics. Portions of the Endowment Lands within the McCall Impact Area may be losing value as forestry/timberlands, yet they retain the remaining characteristics identified in 58-133. In fact, these lands continue to exhibit increased value for reforestation, recreation and watershed protection, and should be treated accordingly by setting them aside and excluding them from sale or exchange. The State's constitutional mandate to achieve maximum financial return from state lands does not conflict with honoring the authority and directives set forth in Idaho code, particularly when parcels in question retain value in other categories, such as the critical need to protect water quality, watershed health, and provide for much needed and long-loved recreation opportunities. While we recognize that a court may find some statutes in conflict with the Land Board's fiduciary duty, where statutes are not in conflict, or where they can complement each other, they do not conflict. With regards to the reservation for sale, "lands...chiefly valuable for watershed protection" do not conflict with the fiduciary duty of the board.

During the January 28, 2021, Payette Endowment Lands Strategy Focus Group meeting, participants were reminded of the increased value and appreciation of the Endowment Lands within and immediately surrounding McCall, and we all noted that the appreciation value far

outpaces current and projected timber values. The dramatically increased appreciation directly derives from McCall's appeal to current and future residents and visitors who recreate on these lands. As the community grows, available housing and potential residential and commercial locations become more difficult to identify and more expensive to acquire. Thus, the demand outpaces the supply, and the value of potentially developable land increases as the supply decreases. ICL remains concerned that the economic growth and success of the region will continue to accelerate the appreciation value of IDL lands. Right now we are discussing the dispensation of 5,500 acres in and immediately adjacent to McCall. In 15 and 20 years from now when those lands are moved from a timberland to a "transition asset class," will IDL then consider disposing of additional Endowment Lands to meet their fiduciary obligations, or will the state choose to assign a value to conservation and water quality and protect these resources?

We understand that Cougar Island has been platted and that it and Shellworth Island are zoned for "Rural Residential," allowing for a single residence per 10 acres. Shellworth Island is 13.1 acres and is platted to support a single residence, and Cougar Island, while only slightly larger at 14.21 acres, is platted in a manner that identifies 5 buildable lots, which conflicts with the zoning ordinances. While we recognize that the Endowment may not be bound by local zoning ordinances, we feel that this is an insult to the hard work that went into the development of the *McCall in Motion: 2018 McCall Area Comprehensive Plan* and the Valley County, Idaho Comprehensive Plan, revised November 26, 2018, which are designed to preserve and protect the values that remain the heart of the McCall and Valley County communities, including foremost among them, the treasured shores of Payette and Little Payette Lakes.

We believe these islands should remain public lands and protected from development. While the portions above the ordinary high water may be considered Endowment Lands that are available for sale or lease to gain "maximum long term financial gain," direct access and anchorage opportunities remain within the realm of public trust lands and water. The sale or lease of these islands would require constructing docks in, or on, public trust waters and/or lands, the loss of public access to these islands would clearly benefit the few rather than the public, and would unfairly impact Public Trust responsibilities. A related argument for leaving Cougar and Shellworth Islands undeveloped centers on the City's limited capacity for infrastructure and services for island residents, and the potential for contaminants associated with septic infiltration systems to leach into lake waters. Simply put, septic and sewage systems on these islands would pose significant challenges and threats to the trust responsibility to protect the lake. This concern clearly falls under the purview of protecting the Public Trust waters and water quality of Payette Lake. We are also concerned that the conversion of Cougar and Shellworth Islands from publicly accessed lands to private property or leased 'with access restrictions' may widen the gap of social disparity in the community by limiting public resources to a privileged few.

We recommend that these islands be considered public trust land in their entirety. ICL recommends IDL work with the City of McCall to find a solution that removes the islands from direct sale or development consideration. One option would be to incorporate the islands as part of Ponderosa State Park. A second option to explore may involve conservation easements that allow for public use while limiting or removing development from the IDL strategy. Appropriate leasing opportunities that allow for public access should also be fully explored prior to disposing of these unique landscapes.

Recommended Solutions

ICL believes there are several paths forward that will achieve the goals of both IDL and the McCall community. First and most obvious is to maintain the status quo for the time being. According to IDL's draft Payette Endowment Lands Strategy, the McCall area Endowment Lands continue to earn revenues that are commensurate with providing long-term financial benefit and gain, suggesting that an imperative to alter course doesn't exist. While these lands have and will continue to gain value through time, the appreciating value directly correlates to the rapidly appreciating social and amenity values that attract visitors and new residents, and contributes to the economic growth in Idaho. Moreover, by selling the Endowment Land properties, IDL is threatening the appreciation of adjacent Endowment Lands. Any proposal should consider whether lands adjacent to parcels now being considered for sale will be next for dispensation.

While maintaining the status quo may help resolve immediate concerns, we do see the value in a long term plan to address the trajectory of growth and IDL management in 5, 10, or 20 years and farther out. Any exchanges, sales or leases for development should be limited to the smaller, isolated IDL inholdings adjacent to existing developments that are already encompassed by the current comprehensive plan. For example, we agree with the Department of Lands's assessment that the Deinhard parcels represent opportunities for additional development in areas already impacted by existing infrastructure. These two parcels are easily accessed by utility infrastructure and would require minimal investment for their development. However, rather than selling these two properties to private developers, we recommend IDL remain open to selling the properties to the City of McCall, allowing residents to have a strong voice in the character and development of their community. As numerous small mountain communities from Ketchum to Telluride have discovered, it is difficult to keep a town running if the people who work in the community cannot afford to live in the community. McCall can avoid this quandary through proactive planning and management, and the Deinhard parcels represent an excellent opportunity to make such an investment in the community's future by providing access to affordable housing, open spaces, and appropriate commercial development.

IDL can also fulfill their constitutional mandate by considering recreational leases on select portions of the McCall area Endowment Lands. This would allow the state to continue

harvesting timber from appropriately designated parcels while gaining financial benefit from the lease price. One potential venue may include yurt or small cabin rentals, similar to those already operating within Ponderosa State Park. Recreation leases currently exist between IDL and the mountain biking community, and these could be expanded to promote regional events.

Ponderosa State Park is a central attraction for the McCall area, and both the local community and broader public would benefit from the park's expansion. There are numerous options available to achieve this goal, including private fund raising drives, direct donation from IDL to the State Park, or through acquisition using Land and Water Conservation Funds (LWCF). The recently passed Great American Outdoors Act assures permanent funding for LWCF, which provides funds and grants to states, soil and water conservation districts, and municipalities to acquire lands for parks and conservation endeavours.

Incorporating lands adjacent to the existing park boundaries makes sense, allowing park officials to manage the contiguous parcels on a landscape scale. As we mentioned earlier in these comments, adding Cougar and Shellworth Islands to the state park system would provide the greatest benefit to the public, affording permanent protections and enhancing the intrinsic value of Ponderosa State Park. ICL believes the incorporation of Endowment Land parcels into Ponderosa State Park represents a viable solution that also achieves the goals of both IDL and the McCall community. IDL would reduce its management responsibilities for isolated or small parcels, the community would retain full public access to cherished lands, and the move would retain ecosystem connectivity.

A third potential option to conserve the McCall area Endowment Lands is through conservation easements. IDL can sell the development rights to organizations, like the Payette Land Trust, yet retain physical ownership and the ability to continue realizing stable revenues associated with managing timberlands, recreation, and other revenue-generating activities. While acquiring the funds for the purchase of these development rights often requires a concerted effort on the part of the whole community, the benefits far outweigh the potential disadvantages. ICL recommends that the Land Board facilitate discussions with the McCall City Council, Valley County and other partners to explore the option of placing conservation easements on select tracts of the Payette Endowment Lands with IDL, for the benefit of the state's management of the region, to protect water quality and to satisfy the interests of local residents and stakeholders. This could be accomplished while also meeting the Land Board's fiduciary duty. These lands may also be eligible for inclusion in the Forest Legacy Program which helps support keeping private and state lands as working lands, while protecting them from residential development.

While we believe most Tier 1 parcels and some Tier 2 parcels are suitable for development, we ask that IDL not discount conservation easements for any parcels put forth and discussed in the Payette Endowment Lands Strategy. We strongly recommend that IDL find alternative solutions

for the Cougar and Shellworth Island parcels, as well as Parcel G, identified for disposal in the Tier II proposal. Development of these parcels retains the greatest potential to negatively impact the water quality of Payette Lake while limiting or eliminating public access.

A Direct Correlation Between Communities and Ecosystems

ICL believes that both natural ecosystems and human communities have a carrying capacity that limits the degree to which a system can support a particular species or characteristic of that community.

While growing communities realize an increased tax base and commercial opportunities, there are often challenges that are less known, such as addressing infrastructure capacity like utilities, fire and medical services, and education resources. However, the most significant challenge found from Ketchum to Telluride is the availability of affordable housing for the essential workers who keep the community operating. One component of the carrying capacity in this situation is the ability to house workers within the communities they work.

From our perspective, McCall and surrounding communities have reached this nexus. With McCall currently breaching this carrying capacity, housing becomes less affordable for essential workers, and the character and nature of the community often changes. The McCall City Council and the citizens of Valley County are having difficult, yet necessary discussions regarding where the limits of growth lie for the town, and how increased growth may change the character of the community, for good or ill. ICL encourages IDL and the Land Board to support the McCall City Council and Valley County residents as they continue having these hard discussions to find a path forward that allows for economic and development growth while retaining the character of the community, preserving the quality of life, and conserving the natural resources that make the area special.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:04 PM
To: Comments
Subject: Comment Submitted

From: Jennet Gray at jennet1130@yahoo.com
Address: PO Box 3015
City: McCall
State: Idaho
Zip Code: 83638

Comment:

To members of the Idaho State Land Board,

Thank you for continuing to take comments on the Payette Endowment Lands Strategy.

I oppose the sale and/or trade of endowment lands in the McCall area for so many reasons, including some listed below. Development around Payette Lake will threaten our sole source of drinking water, and as the Governor stated, we are at the top of the ditch. One idea would be to create a new asset management category: watersheds. Watersheds would be classified like timberlands are, and would not be available to be sold. Cities, citizens, etc would be able to purchase long term leases to protect the watersheds. This would fulfill the fiduciary obligations of these lands.

A bulk sale of endowment lands will not produce long term income for the beneficiaries.

The creation of a stakeholders advisory group and more time to develop a comprehensive plan is critical to the future of these lands, and all Idahoans.

Please consider the voices of your constituents when making decisions about these precious lands.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:06 PM
To: Comments
Subject: Comment Submitted

From: Kevin Hildebrand at kdh1975@gmail.com
Phone: 208-290-9396
Address: 1098 Lick Creek Rd.
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I favor divestiture of as much endowment land as you deem fiscally profitable.

Given the current value of land around McCall and an annual income of just \$235,000, the cap rate on this land is infinitesimal.

McCall suffers from what I call the "gang plank" syndrome. I'm on board, pull up the gang plank.

There is no doubt in my mind that all the antis would have fought hard against the subdivision they now live in.

A "greedy developer" is someone who wants to build a house in a nice area. A "concerned citizen" is someone who already has a house in a nice area.

Over 91% of the land in Valley County is public. That would seem to provide plenty of recreational possibilities.

The proudly progressive citizens of McCall are always complaining about the lack of affordable housing, but reliably fight every plan to create more housing stock. I think they missed that part about supply and demand in Econ 101.

So, by all means, follow your mandate and maximize revenue to the state treasury. It would be nice, for once, to tap a revenue source other than our 12th highest in the nation income tax, and our ever-increasing property taxes.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:09 PM
To: Comments
Subject: Comment Submitted

From: Nick Harris at Nicholassharris@optonline.net
Phone: 9173125574
Address: 1136 E Highland View Drive
City: Boise
State: Idaho
Zip Code: 83702

Comment:

Esteemed Director Miller and Board Members of the Idaho Department of Lands,
First, I wanted to thank you for including us on the advisory panel that considered the PELS proposal. It was a highly collaborative effort, and clearly demonstrated the value that a diversity of opinion brings in solving a complex problem such as this one. It also clearly demonstrated that a win-win scenario is possible. Participating on this panel, has shown me the endowment beneficiaries and all the parties assembled, including the state of Idaho can achieve a commonly successful outcome. However, the PELS solution was only possible partial solution. There are other solutions that are more complete and more effective that can be reached in an expanded collaborative effort.

The 5400 acres considered in PELS is only a small portion of the IDL lands in the area. The proposal was also largely focused on a phased disposal of assets rather than considering other less permanent and potentially better financial outcome to beneficiaries. The board would be well served to thoroughly explore these other options, rather than hastily considering the proposals under consideration. Certainly some of the ideas developed in PELS could and should be considered in potential larger solution, but it is not the solution by itself.

I would urge the board to slow down. Slow down and take the time, in an inclusive way, to map out stake holders, environmental impact and consider other options that may be more financially attractive to the beneficiaries and the state. The mandate of the IDL is to pursue long term economic return. However, the IDL is overly focused on pursuing yield from these properties rather than return. Too much focus has been made on the cash yield generated by these properties. Ironically these same properties are likely the highest appreciating assets in the IDL portfolio. Not enough credit has been given to the appreciation of these assets. In fact, for most assets appreciation forms the biggest percentage of return, and yet it is not being fully accounted for by the IDL. Slowing down to consider other options, is also probably the best financial option to the board, given the rapid appreciation of these lands and migration to the state.

There are many other options to consider beyond just disposal, these include conservation easements or leases, recreational easements or leases, timber sales, leases for rangeland or access fees. All of these strategies could be utilized, in many cases in tandem, and are not exclusive. There is also the long-term economic benefit the state of Idaho, Valley County, and the city of McCall that should be considered from leaving these lands un-developed. Perhaps an arrangement could be made to compensate beneficiaries for maintaining these lands and contributing to state growth.

This is a complex problem. Solving complex problems requires creative and long-term thought, as well as collaboration and time. I strongly suggest the state of Idaho slow this process down, and initiate a collaborative process to explore other options. These lands are important engines of growth to this state, and a precious resource. IDL has held these lands for 130 years. Let's at least take the time to thoroughly explore and determine our optimal solution.

Kind Regards,
Nick Harris

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:19 PM
To: Comments
Subject: Comment Submitted

From: Philip Roth at
City: McCall
State: Idaho

Comment:

The endowment lands in and around Payette lake provide more money and resources than just timber. For the town of McCall, it provides drinking water. If the ground is sold and the water quality can no longer be guaranteed. People come to McCall, and that brings in lots of money that support this community. Without these lands, people will have to travel further to recreate and will spend less money in our community. Recreation brings in more money than any other industry, and taking this land away takes money out of the hands of hard-working Idahoans. I am also aware the state has been approached about a recreational lease that would cover the gap in lost revenue. By converting the land for public benefit, the state would continue benefiting from the timber, fish, and wildlife lease and a lease to cover timber revenue loss. This land provides benefits to the state multiple times when compared to losing it to the private sector.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:25 PM
To: Comments
Subject: Comment Submitted

From: Nate Runyan at Dhengr77@aim.com
Phone: 208-830-4759
Address: 2373 E Garber Drive
City: Meridian
State: Idaho
Zip Code: 83646

Comment:
Hello Idaho Land Board,

I ask the board to develop a Conservation Easement Option when determining how to manage state lands and that you extend the moratorium to allow sufficient time to develop this option. When land is purchased at fair market value and put into a conservation easement this will generate revenue for the endowment through encouraging recreation uses and wildlife opportunities that bring money and people into these neighboring communities. The value of recreation is increasing exponentially in the Western states and should be factored into the decision process when determining what is the best use of land. The state should complete a study to determine the economic impacts from recreation on other nearby states including: Oregon, Washington, Montana, Wyoming, Utah, Colorado etc.. A properly developed model (this will have to be completed at some point) for McCall will benefit other communities across the State as well, to accurately monetize the impact recreational opportunities have on surrounding towns and the State of Idaho. Lastly, conservation easements can also be written to allow for traditional uses, such as timber and grazing, thus keeping the land in the Endowment portfolio and allowing for continued revenue.

Sincerely,

Nate Runyan

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:31 PM
To: Comments
Subject: Comment Submitted

From: Rob Anderson at
Phone: 2088910569
City: Boise
State: Idaho

Comment:

Please keep these lands public. Idaho is increasingly being sold off and we are losing our access to public land and recreation resources.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:45 PM
To: Comments
Subject: Comment Submitted

From: Cynthia Bambic at cdbambic@gmail.com
Phone: 208-869-1028
Address: 252 Schmeizer Lane
City: Boise
State: Idaho
Zip Code: 93706

Comment:

Development of a "Conservation Easement Option" for the Payette Lake areas, as well as other integral scenic areas that are unique to Idaho would be the best land management practice IDL could institute going forward. The East Side of Payette Lake holds the last undeveloped pristine beach area open to local McCall area residents and tourists. This pristine beach is an irreplaceable asset to our State; providing public accessibility for recreation and natural habitat and scenic views to local and tourists alike. If developed, or timber harvested, the inherent value of the natural environment value is lost forever. Many longtime Idaho residents, nearby residents, tourists as well as local employees recreate and cherish this scenic corridor on Payette Lake. Water quality, wildlife and views of the Payette lake would be diminished if timber harvests or over development transpired here. Preserving this treasured untouched area via a Conservation Easement Option would be the smartest and best use and highest value for the future of Idaho in regards to the Valley County tourist economy, growth.

In order to best address protocol and inform the greater public in Idaho, more time should be given to develop a Conservation Easement Option approach. Open scenic recreational lands should be given time and evaluations with public input; from the ones using it in the summer and the local community whose economy may be affected by IDL management decisions. Not just a few interested parties that happen to follow the changes in land management during the off season month. This discussion needs to be ongoing.

Conservation Easements are a way to generate revenue for the Endowment, as they are purchased at fair market value. Land that was set aside for IDL management, since Statehood ,has gained value over time, and likewise; over time the Conservation Endowment Funds can provide similar equitable market value for IDL Endowment revenues.

A properly developed model for McCall will benefit other communities across the State. Payette Lake is unique as are many other areas in Idaho. If a well thought out model is developed collaborating with professional ;and stewards and the local communities, over a specified time frame, land management foresight will bring about the greater good for Idaho. In the long run, this model can provide a basis for other localities by example and standards so that each may have a path to follow to balance value of development and timber sales with scenic corridors, grazing, recreation and the totality of resource utilizations. IDL as stewards can manage via this model for the best interest of Idahoans now and in the future.

Conservation Easements can be written to allow for traditional uses, such as timber and grazing. Keeping certain parcels of prime land in the Endowment portfolio allows for continued revenues, while at the same time, continuity of historic use: Enjoyment!

THANK YOU for giving this matter the time and consideration it deserves for the people of Idaho; the open meetings and chance to express opinions. I hope these comments are helpful in determining the benefit of Conservation Easements Options.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 5:57 PM
To: Comments
Subject: Comment Submitted

From: Ann McQuade at damcquade@frontiernet.net
Phone: 208-634-4740
Address: 14042 Deerfield Rad
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Don't let a wolf in sheep's clothing destroy what we all love. Public property/lands & access is what makes Idaho incredibly special, along with the water (pristine water), wildlife, outdoor recreation, open spaces. The rapid growth of Idaho puts what we love in jeopardy. Those in power need to be wise, maintain what makes us special, not just make a "quick" buck—we lose in the end. The Payette River Basin is in jeopardy, please be prudent & responsible.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 6:13 PM
To: Comments
Subject: Comment Submitted

From: Deborah Holleran at holl77@cableone.net
Phone: 2088503496
Address: 4238 N. Hackberry Way and 1612 E. Lake Street
City: Boise and McCall
State: Idaho
Zip Code: 93702 and 83638

Comment:

No, no, no. We don't need the State Land Board and Idaho Legislators to approve this development. Listen to the majority of residents!!

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 6:39 PM
To: Comments
Subject: Comment Submitted

From: Robert Thomas at win70shooter@live.com
Phone: 775 720 6640
Address: 880 East Beacon Light Road
City: Eagle
State: Idaho
Zip Code: 83616

Comment:

Sirs, I am a 75 year old 100 % Combat Disabled Vet. All of the areas I have hunted in previous years are now either in private hands or access to the hunting areas are blocked by private lands. I can't even take my grandkids hunting with current restrictions on vehicles. Please don't put more land and access into private hands. Idaho is losing a generation of hunters due to private land restrictions.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 6:49 PM
To: Comments
Subject: Comment Submitted

From: AnnMarie Halverson at annieoutside@gmail.com
Phone: 605-366-5192
Address: PO BOX 2853
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I, AnnMarie Halverson, am forcefully opposed to the Land Board's consideration of developing the endowment lands via the Trident proposal. Although I was not raised in McCall, I have resided full time and worked full time as an RN in this community for over a decade. I have witnessed many changes in the last 14 years, and almost none of them have been positive. The Covid-19 pandemic has caused a shift in population distribution, however, developing land and building expensive homes for those buying their second, third, or even fourth home is exactly the opposite of what needs to happen in this community.

The people of McCall should determine the development of our community, not those who live outside of our community who fundamentally do not have a concern for our quality of life and our future.

We have seen around the country the rapid growth of the US wildland-urban interface (WUI = housing developments encroaching in wildland areas) drastically raising wildfire risk. This has been devastating in Oregon, Wa, and California. Why in the world would we in McCall invite this prospect of increased wildfire, property destruction, uncontrolled fire damage, and human tragedy to our community? Science and data are telling us to do the exact opposite.

By removing these endowment lands from the general public and developing the wildlands surrounding McCall, the land board is literally cutting out the heart of the beauty and recreational attributes of our area. We should be actively preserving these areas for the future of our area, not developing them.

We need housing for those who live and work in our community. The development of these lands is targeted to developers, tourists, 2nd home owners, and prospectors. Development of 2nd homes and vacation home rentals to cater to a large population of people who have moved to McCall has already has profoundly changed the economics of the community. We should be focused on providing affordable housing and preserving the quality of life we cherish. So many people who live and work in this community cannot find adequate/affordable housing, and that should be the first priority.

The infrastructure development required to develop these endowment lands is huge. It is also deeply impactful to the surrounding areas, wildlife habitats, and again impacts quality of life for those who do live here full time.

We have many many other lands that could be developed for housing that are more fire-safe, more linked to the community and commercial areas, and attached to existing infrastructure. Urban development practices tell us this is the way to grow a community, not tearing out wildlands and recreational areas that give a community its quality of life. We need to be looking at how communities can sustainably grow, not how we can mine dollars and devastate wildlands. I humbly submit these comments and deeply hope you consider rejecting the development of these endowment lands. Idaho is better and smarter than this proposal. Please don't let greed win this one.

Sincerely,
AnnMarie Halverson

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:12 PM
To: Comments
Subject: Comment Submitted

From: Valentin Flores at vflores0568@gmail.com
Phone: 2089540568
Address: 629 E Santolina St
City: Kuna
State: Idaho
Zip Code: 83634

Comment:

As I sit here waiting for my friend I ponder the fact that we would not have the same opportunity to go ice fishing if this land swap went through. For the past few weekend I have been exploring more and more what cascade and the surrounding wilderness had to offer. In terms of psychological benefit, I need this area to recreate. From shooting at tamarack on the 3D course to drilling holes in the ice I use the lands to their fullest potential. Already in 2021 I have traveled to McCall and surrounding cities to spend time and money on them. From filling up at the gas stations to renting winter gear I put in a good amount of my hard earned paycheck into going up there. If the ability to recreate and possibility to use those lands disappears so will my resources. Not only do I go to McCall to have fun but I do my fair share of cleaning trails and waterways whenever I see folks leave behind their litter. If the ability for me to do so is hindered I will not be making the same commitment to the lands in the future. While I recognize that it might seem profitable to do such a transaction I can guarantee that Idahoans not the private entities will be left to clean up the messes left behind by negligible actions. Reconsider your current agenda to serve the purpose of all and not just individuals. These past weekends have greatly opened my eyes as to the importance that these lands hold, I hope you all realize the same.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:25 PM
To: Comments
Subject: Comment Submitted

From: Dave Mays at Tellico73@yahoo.com
Phone: 208-553-0975
City: McCall
State: Idaho

Comment:

My wish is that the public lands not be sold and instead be kept strictly for outdoor recreation and scenic values.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:25 PM
To: Comments
Subject: Comment Submitted

From: Michael Wiedenfeld at mike.wiedenfeld@gmail.com
Phone: 2089225167
Address: 12022 W. Tustin Ln
City: KUNA
State: Idaho
Zip Code: 83634

Comment:

I would like to thank the Idaho Department of Lands for the opportunity to give public comment on the Payette Endowment Lands Strategy (PELS). I have lived my entire life (55 years) in southern Idaho and have spent more time in the surroundings of McCall and Valley County than probably any other location on earth outside of the treasure valley. The ability for my family to hike, hunt, fish, paddle board, snowshoe, camp etc etc has become a part of our lifestyle DNA and some of the dirt on my boots is frequently from Idaho Endowment Lands.

When the Idaho Endowment Lands were enacted around the time Idaho became a state there were three clear ways to use the natural resources to support state needs. Those three ways were grazing, mining and timber harvest. It is VERY doubtful that a fourth way, recreation, was even considered, at that time, as a possible way those lands could be used to support state needs given the extremely low population density and travel time to amazing locations like McCall. However, today's Idaho population, as well as the ability for ALL Americans and even visitors from other countries to visit the McCall area, have a huge impact on the economy of Valley County and all of Idaho that should not be ignored in decisions on how Idaho Endowment Lands are used.

The PELS proposal is very concerning to me as I look into the future for my children and (someday) grandchildren and beyond. The tiered plan which contains tiers called Planned Transition (high probability of transitions 1-5 yrs), probable (5-10 years) etc. illustrates a planning process that implies a desire or requirement to dissolve Idaho's Endowment Lands. Transitioning land to private entities for short term gain will remove the ability for long term opportunities for future generations to have adequate access to Payette Lake, and the surrounding areas. The PELS proposal also would likely become a blueprint for other proposals and land swaps around the state of Idaho on other Endowment Lands.

I recognize that Idaho Endowment Lands are statutorily required to maximize the return for the state of Idaho, but return over what time frame? No matter what the dollar value is today, the economic impact of recreation over decades will outpace the short term, one time, financial payoff. The inevitable development around the Payette Lake, if Endowment Lands are "transitioned", doesn't tell the whole economic impact to the state after all only a limited number of lots could be created due to water quality issues in such close proximity to the river and lake. This limited number of users, likely as 2nd homes, cannot support the rest of the community in comparison to the hundreds of paddle boarders on the Payette river above North Beach every day because they can't eat the same number of meals a day multiple recreationists can at local restaurants, or buy gas for boats, RVs and ATVs.

I challenge the Idaho Department of Land and PELS to really move slow on any transition plans to Idaho's Endowment Lands as there is no turning back after any lands are lost for the citizens of Idaho. I challenge you to do the following really difficult work:

1) Change what is called Tier 4 in PELS to Tier 1 with the definition of Tier 1 becoming "Lands that are so critical to the multiple and varied uses by ALL the citizens that they should never be transitioned". In my opinion, that should include

significant access to Payette lake and river at the northern end. Then you can move the tiers in the other direction to those locations that have limited access and limited resources. Work from most critical for All to most critical for the few.

2) Work closely with the Idaho Legislature to restructure how Idaho Endowment lands are managed to include recreation's impact as a key part of the value added component. This might also include some level of a surcharge on all recreation related purchases that would go to the Endowment fund to offset the short term desire to "transition" Endowment Lands to private entities based on real estate values.

Lastly we DESPERATELY need the Idaho Department of Lands to continue to be the agency that manages Endowment Lands rather than working on "transitioning" them. Our future generations deserve to have places to experience the wonders of Idaho!

Thanks again for your efforts and willingness to take public comment.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:31 PM
To: Comments
Subject: Comment Submitted

From: jamie Olavarria at jamieolavarria@gmail.com
Phone: 2083150036
Address: Box 13, 13960 Nisula Road
City: McCall
State: Idaho
Zip Code: 83638

Comment:
March 1, 2021
State Board of Land Commissioners,

I am writing to express my opinion concerning the Trident Land swap of Public Lands surrounding the McCall Area.
Please turn down this request.

As an Idahoan and a Valley County resident of 40 plus years I cherish our public lands and use the lands often. To trade off our public lands to a developer such as Alec Williams who will then profit as a developer is outrageous! I can only imagine our favorite places will be developed into huge homes who will then construct NO TRESPASSING signs. Please listen to your constituents. Please do not shut us out or allow a private developer to do so. I know this is a complicated issue. Please explore other avenues for revenue.

Sincerely,

Jamie A. Olavarria

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 7:45 PM
To: Comments
Subject: Comment Submitted

From: Julie Whitescarver at sidekickjewels@hotmail.com
Phone: 2087030530
Address: PO BOX 1828
City: McCall
State: Idaho
Zip Code: 83638

Comment:

These are places where memories happen. Where dreams happen.

It's worth more than gold. There is no price to put on it.

These special places are endangered. The character and honorability of our community is endangered.

I ask you to remember your favorite place as a child. What makes it your favorite? Did it ever go away? If it did, how did it feel? Do you ever wish it back?

My favorite place? The beating heart of the river systems and lake that continues to fill up generations of families souls and smiles. A place that shouldn't be erased.

The preservation of this space, YOUR SPACE, OUR SPACE, matters. One day, you can be proud this special place still exists. Because you made a choice that matters.

The minnows that nibble on your toes. The thriving moose population. The trees that provide hiding spots and habitats for elusive wildlife. The way it rains on your adventure and then, the sun comes out.

I hold hope that you will do something big for our great state of Idaho. You matter. Idaho matters. I hold hope you continue to share these crystal clear waters, gentle snowfalls, and the wonders of the changing seasons hatching all around. You are part of something real. Idaho believes in you. Idaho believes in us.

Our true nature is to find ourselves lost and in love with places like these. Pure, unforgettable escapes that are free and open for everyone to grow tall with. No matter how old you are, you can always learn from the wise trees, watershed and history of this home.

Don't give up. Idaho is a rare gem with the ability to bring out the best in all of us.

From: Thomas Manning, MD <TManning@idneuro.com>
Sent: Monday, March 1, 2021 7:54 PM
To: Renee Jacobsen; Dustin Miller; Comments; Sid Anderson; Scott Corkill; Ryan Montoya
Cc: Thomas Manning, MD
Subject: For inclusion with comments regarding the Payette Endowment Lands Strategy

Dear Land Board Members and IDL Officials,

Please have a review of this photo (below). It is Secretary of State Denney on the cover of the McCall Star News from December. The Secretary is quoted as saying, "I wonder whether we should even be concerned about what the City of McCall thinks."

Is this kind of attitude for real? Let's get the secretary out hiking some of these public endowment lands so he can appreciate what we've got. Hopefully, he just mis-spoke. Maybe he could clarify at the next Land Board meeting.

Respectfully,
Thomas Manning MD, PhD
Boise, ID
McCall, ID



From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:00 PM
To: Comments
Subject: Comment Submitted

From: Patrick Zak at pjzak1@icloud.com
Phone: 208 315 7898
Address: 316 Rio Vista Blvd
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I oppose the land swap proposed by Trident Holdings for the Idaho endowment land surrounding McCall. The endowment land surrounding McCall is too valuable of an investment for long term financial return to be traded off for the less valuable property that Trident is offering for the swap. Trident would not be seeking the swap if it was not going to make them a sizable profit. The State of Idaho should be the ones making the profit. The State of Idaho has a significant investment in the endowment lands around McCall. The State of Idaho and Idaho schools should be receiving the dividends of that investment. We should not be trading away Idaho's valuable land assets to Trident Holdings.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:02 PM
To: Comments
Subject: Comment Submitted

From: Laura Busch at Burpee.laura@gmail.com
Phone: 208-860-2994
Address: 2734 S Barnside Way
City: Boise
State: Idaho
Zip Code: 83716

Comment:

Thank you for the opportunity to provide comments. I am writing to express my concern over the proposed land swap agreement. As a fourth generation McCall land owner, I urge the State of Idaho to look at the long term implications of this decision. We do not want nor can our infrastructure support the sprawling growth that this could cause. Please continue to protect our public lands.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:10 PM
To: Comments
Subject: Comment Submitted

From: Bradley Compton at bradc@idahosportsmen.org
Phone: 208-631-3145
Address: PO BOX 2896
City: Boise
State: Idaho
Zip Code: 83701

Comment:
Dustin Miller
Director, Idaho Department of Lands

Dear Dustin,

First, thank you for the opportunity to participate in the Payette Endowment Lands Strategy Focus Group. Your commitment to engaging the public in the draft plan is much appreciated, and valued. The meetings were well run, informative, and very helpful in developing a better understanding of endowment lands and the draft plan. We understand, and support, the mission and constitutional obligations of the Idaho Department of Lands, and we are grateful that hunting, fishing and trapping are allowed on approximately 2.5 million acres of endowment lands across Idaho.

Idaho Sportsmen is a recently formed 501 (c)(3) [status pending] nonprofit organization dedicated to enhancing and protecting access and opportunity for Idaho hunters, anglers, and trappers. We are dedicated to uniting the men, women, and youth of Idaho who hunt, fish and trap, to protect and advance our shared heritage. Important to our mission and constituency is maintaining access to large intact blocks of quality habitat, hence our interest in the endowment lands in the McCall area.

The Payette Endowment Land Strategy (PELS) is a draft management plan for the 5,478 acres of endowment land surrounding and within the City of McCall in Valley County, Idaho. The Plan proposes how the Idaho Department of Lands will implement management of endowment trust land within the McCall's Area of Impact over the next 20 years. Because of the relatively narrow scope (373 acres in Tiers I, II, III) of the proposed plan, Idaho Sportsmen is not overly concerned implementation of the plan will result in significant impacts to the hunting, fishing, and trapping opportunity currently allowed on endowment lands in the greater Payette Lake area. Our primary interest lies with maintaining access to Payette Lake and the 26,000+ acres of endowment lands that lie west, north, east, and southeast of the lake.

Our Board of Director's review of the plan finds the plan well balanced between providing enough prescriptive strategies to provide the community an understanding of timelines and outcomes, and being adaptive enough the Land Board maintains broad decision space in the future. Additionally, we support the plan's commitment to strong coordination with the City of McCall and Valley County. Close coordination can help ensure that endowment lands retain their original asset classification, thus allowing public use, and avoid becoming isolated or encumbered and in need of transition.

We do have two recommendations for your consideration. First, we recommend additional language be incorporated into the plan to describe the process and timelines associated with declaring a land parcel in transition. Secondly, we recognize that many homeowners and recreationists in the McCall area very much value the current condition of the

parcels. Therefore, we recommend continued close coordination with citizens and community leaders allowing for adequate time for development of a community strategy that meets local goals and the constitutional obligations of endowment lands.

Again, thank you for the opportunity to participate and if we can be of any further assistance, please contact us.

Sincerely,

/s/

Bradley B Compton

Vice President, Idaho Sportsmen

bradc@idahosportsmen.org

From: Sid Anderson
Sent: Monday, March 1, 2021 9:07 PM
To: Renee Jacobsen
Subject: FW: The Future State of Idaho
Attachments: boysof mccall.jpg; kids of mccall.jpg; river day.jpg; kayak1.jpg; river.jpg; rivers.jpg; shoreline2.jpg; WIN_20210301_18_34_13_Pro.jpg; WIN_20210301_18_33_49_Pro.jpg

From: Julie Whitescarver <juliekwhitescarver@gmail.com>
Sent: Monday, March 1, 2021 8:12 PM
To: Sid Anderson <asanderson@idl.idaho.gov>; Scott Corkill <scorkill@idl.idaho.gov>; governor@gov.idaho.gov; pelamccall@gmail.com
Subject: The Future State of Idaho

To My Friends of Idaho,

In regards to The Trident Land Holdings:

These are places where memories happen. Where dreams happen. Some call it magic.

It's worth more than gold. There is no price to put on it. All the huckleberries in those secret spots can't cover it.

These special places are endangered. The character and honorability of our community is endangered.

I ask you to remember your favorite place as a child. What makes it your favorite? Did it ever go away? If it did, how did it feel? Do you ever wish it back?

My favorite place? The beating heart of the river systems and lakes that continue to fill up generations of souls and smiles. A place that shouldn't be erased.

The preservation of this space, YOUR SPACE, OUR SPACE, matters. One day, you can be proud this special place still exists. Because you made a choice that matters.

The minnows that nibble on your toes. The thriving moose population. The trees that provide hiding spots and habitats for elusive wildlife. The way it rains on your adventure and then, the sun comes out.

I hold hope that you will do something big for our great state of Idaho. You matter. Idaho matters. I hold hope you continue to share these crystal clear waters, gentle snowfalls, and the wonders of the changing seasons hatching all around. You are part of something real. Idaho believes in you. Idaho believes in us.

Our true nature is to find ourselves alive and in love with places like these. Pure, unforgettable escapes that are free and open for everyone to grow tall with. No matter how old you are, you can always learn from the wise trees, watershed and history of this home.

Don't give up. Idaho is a rare gem with the ability to bring out the best in all of us.

Best,

Julie Whitescarver
Born and Raised, Idaho Proud















I Love Home
and rivers!



This land belongs
to the people of McCall

I will not let it go

I  ve

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:23 PM
To: Comments
Subject: Comment Submitted

From: Camille and Brian Holleran at camilleholleran@gmail.com
Phone: 2082720313
Address: 5046 N Arrow Crest Way
City: Boise
State: Idaho
Zip Code: 83703

Comment:
From two born & raised Idahoans we oppose this transaction. Idaho needs to be preserved!

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:25 PM
To: Comments
Subject: Comment Submitted

From: Crissy Kojima at cresendagail@yahoo.com
Phone: 2086100997
Address: 6864 W. Tobi Dr
City: GARDEN CITY
State: Idaho
Zip Code: 83714

Comment:

I strongly oppose the selling off of public lands around Payette Lake! The future of the land and public access to it needs to be the primary consideration. Preservation of long term access for the public must not be compromised for short term profits!

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:40 PM
To: Comments
Subject: Comment Submitted

From: Terri Zak at pzak@frontiernet.net
Phone: 2086344558
Address: 316 Rio Vista Blvd.
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I oppose the privatization of endowment land parcels on the North, West, and East sides of Payette Lake. Privatizing these lands would eliminate easy access to adjacent National Forest Lands. Development of these parcels could jeopardize the water quality of Payette Lake by damaging the watershed and increasing the release of pollutants into a pristine water source. Losing these lands to development would be a significant loss to the people of Idaho and risk turning a clear clean lake into murky, weed infested cesspool.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:41 PM
To: Comments
Subject: Comment Submitted

From: Ellen Weygint at
City: Donnelly
State: Idaho
Zip Code: 83615

Comment:

Thank you for the opportunity to comment on the Payette Land Endowments Strategy. I believe that at this time, a land swap of endowment land around McCall for 16,000 acres of unspecified timber land in northern Idaho would be a mistake for a variety of reasons. The public access around McCall is one of the reasons that people live in and flock to the area for things that Idahoans hold true; clean water, pristine forests, and the ability to enjoy and explore the outdoors. Handing it over to a developer would be an enormous mistake, one that could not be taken back. I hope that the land board will take this opportunity to slow down and examine the beliefs that are at the foundation of our state that was founded largely on public land in the 1800s. I believe that the land board could effectively develop a plan to incorporate the long-term financial gain required of endowment lands while also considering recreation, conservation, and water quality issues of the area. Have conservation easements been thoroughly explored? Maximizing recreation easements as well as traditional grazing & logging could provide substantial financial return, for example. This is a complex issue and I am confident that the land board and stakeholders will develop a solution that benefits the majority of land users, allows for the continued public access, and guarantees continued financial gain from the land.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:46 PM
To: Comments
Subject: Comment Submitted

From: Ann Link at alink792@gmail.com
Phone: 2089835910
Address: PO Box 449
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Trading the pristine land that Trident wants to exchange for timber lands in north Idaho is a mistake. They want to trade this land to develop because they expect to make a lot of money. This is irreplaceable, undeveloped land. Once it is developed with condos, hotels, and roads, we will have lost what makes McCall the crown jewel of Idaho. It will become another Lake Tahoe. Development will pollute Payette Lake, bring huge traffic problems, log our beautiful forest, and desecrate the most beautiful land in Idaho. My husband and I are more than willing to pay higher taxes for state education. This is not the way to fund state education. The fairest way to fund public education is to have all taxpayers pay their share. That way we all have a stake in public education. We also have a responsibility to preserve these pristine areas for our children and grandchildren. The land they want to develop will only become more valuable because there is less and less land like the land they want to trade. Land is a finite resource and we need to keep as much as possible pristine.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:48 PM
To: Comments
Subject: Comment Submitted

From: Patric Zak at pzak@frontiernet.net
Phone: 208-634-4558
Address: 316 Rio Vista Blvd
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I oppose the privatization of endowment land parcels on the North, West, and East sides of Payette Lake. Privatizing these lands would significantly restrict access to adjacent National Forest Lands and could result in damage to the water quality of Payette Lake.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:52 PM
To: Comments
Subject: Comment Submitted

From: Jennifer Lewis at jennifer.kathryn.lewis@gmail.com
Phone: 5708408995
Address: 523 Brundage Drive, PO Box 2387
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Public land and lakes in Valley County and the access to these are priceless. Idahoans should be thinking about tomorrow, the next decade, the next century of Idaho—and I hope our children and grandchildren recognize the same features that make Valley County and McCall one of the best places on earth to live. Please don't sell these places out for the short-sighted interest of a financial windfall today. Let's preserve Idaho for ALL Idahoans, and not create more wealthy investors and more second vacation homes.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 8:53 PM
To: Comments
Subject: Comment Submitted

From: Lisa Ozuna at Ozuna.Lisa@gmail.com
Phone: 208-484-4004
Address: 2607 W Stewart Ave
City: Boise
State: Idaho
Zip Code: 83702

Comment:

I urge you to keep Idaho public lands public. These lands should not be sold off to the highest bidder so that wealthy out of staters cannot come to Idaho and exploit our lands at the expense of working middle class Idahoans. These lands are our birthright as Idahoans and should be preserved for our kids and future generations. Please do right by Idahoans.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:09 PM
To: Comments
Subject: Comment Submitted

From: Bart Johnson at
City: Boise
State: Idaho

Comment:

My comment would fall under the "general" category, I guess. As a life long Idahoan I've come to realize that we must protect what we have and what has for as long as I've been alive (42 years) defined Idaho; it's open spaces. These open spaces that fall under the jurisdiction of Federal or State agencies provide all Idahoans with a place to recreate, get away from their daily routine, connect with nature, camp, cycle, hike, ATV, hunt, fish, and also provide sources of fresh water and air. These same spaces draw folks in from all over the country and from other countries to experience the same things that many Idahoans experience everyday. These tourists and Idahoans of all backgrounds and economic status can utilize and do benefit from these open spaces for many reasons including those I mentioned above. The many facets of the outdoor industry certainly provide a greater economic benefits than a one time sale of land. So why split up this open space and sell parts off to wealthy families or individuals? How does that benefit Idahoans as a whole? In the long term, because that's what we as Idahoans should be concerned with, it only benefits a small number of wealthy families and individuals.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:11 PM
To: Comments
Subject: Comment Submitted

From: Yvonne Sandmire at samsandmireidaho@gmail.com
Phone: 208-859-0560
Address: 800 W. Ranch Rd.
City: Boise
State: Idaho
Zip Code: 83702

Comment:

I oppose selling or trading the endowment land in the Payette Lake & surrounding area to a private company. We must keep these valuable recreation, scenic & wildlife habitat lands in public hands. These lands are the essence of McCall & the reason people visit and settle in this gorgeous, natural area. Keep public lands in public hands!

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:33 PM
To: Comments
Subject: Comment Submitted

From: Sky Wilson at nosliw96sky@gmail.com
Phone: 5417096806
Address: 818 Lake st
City: Grangeville
State: Idaho
Zip Code: 83530

Comment:

My name is Sky Wilson and I am the 24 year old owner of Ya-Hoo Corrals in McCall Idaho. Ya-Hoo Corrals is a horseback trail ride tourist attraction located on endowment leased land in McCall. It has been located at the same location for over 30 years. This is my second year of owning the business, but I have worked here for 8, and Ya-Hoo has been a staple attraction that continues to steadily increase with visitors each year. Our guests are a split of return and new every summer. Some guests came as children and now bring their own families, some come for therapeutic reasons because of various disabilities, and others come out just to enjoy the horses and beauty of the area. The extensive trail system and bridges in the area, utilized for biking, hiking, and horseback riding are maintained by Ya-Hoo Corrals and are irreplaceable. Recreational lands like these are a large job and revenue producer when looking at the long term financial return. This is found in the July 2011 Endowment Land Trust Study done by Peter R. Crabb, Ph.D.. From the executive summary, I quote, "As of the end of fiscal year 2010 it is estimated that Idaho's Endowment Trust Lands contributed \$133 million in annual economic activity and support nearly 2,000 jobs in the state of Idaho." "This economic study is carefully designed to determine the portion of Idaho's total economic activity attributable directly to operations on Endowment trust lands, the expenditure of income from these operations by the Endowment beneficiaries, and the statewide recreational activity that occurs on these lands. The above contribution estimate covers the direct, indirect, and induced expenditures from all these activities using county, multi-county, and state level data."

Now let's take a look at our state constitution Article 9, Section 8, line 4, where it says that endowment lands shall "secure the maximum long term financial return." To me securing the maximum long term financial return is much different than what Attorney General Wasden was quoted for July 23rd in the Star News having said "managing state lands to earn the most money possible."

These endowment and recreational lands, approximately 1000 acres that are needed to operate the corrals, surrounding current homes will continue to drive up property values and taxes therefore bringing more money to the state to fund as fiduciarily responsible.

Speaking with a local Timber Sales Administrator I learned that this approximate 1000 acres, dependent on timber volume, would bring an estimated \$1.8 million to the state in a timber sale. This is based on a 50 year timber stand rotation. Logging would also be needed to maintain fire suppression leading up to the Warren Wagon, a fuel break between timber lands and houses just across the road. In 2020 Ya-Hoo will have paid \$5,421 for base rent and gross receipts as well as \$8,339 in sales tax to the state in just 3 months. Taking the total of these two, \$13,760, and multiplying by 50 years brings a total of \$688,000 paid to the state. In addition to the corrals, these lands could still be logged and potentially bring a 50 year revenue of over \$2.48 million dollars between the two. Timber sales will increase as will our prices and numbers of guests. This in turn means the property values will continue to rise around this recreation bringing increasingly more money to the state. This long term financial return is much greater than a one time sale or trade to the state. This roughly, 1000 acres brings much more than can be immediately measured monetarily, but we can get an idea of the value of this single lease and revenue it generates. Losing this portion of endowment lands around Payette Lake would be devastating monetarily to my lively hood, thousands of visitors to the area, home owners located near the area, and the long term financial return that the state is responsible for managing.

What will happen to such a uniquely located and high volume operating tourist attraction that is typically a first time experience for most? I ask you what will happen to me? Where will I go? What will happen to another viable small business in these already hard times in the great state of Idaho?

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:45 PM
To: Comments
Subject: Comment Submitted

From: Glenn Dalglish at
Phone: 2083153536
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Hello. Thank you for taking the time to read my comments. First off, Fuck You. Those are my sentiments on the proposed plans for the endowment lands. I have worked for 5 years on the Payette National Forest. and as a real local, this decision would forever change McCall for the worse. I pity the future of anyone who comes to McCall and doesn't get to enjoy it like it is now. It's always about money it seems. Don't let wealth blind you from seeing the real treasure. I don't think I need to explain what that treasure is. Seems pretty obvious if you take a drive around Eastside Drive. I was born at McCall Memorial Hospital in 1988 and those lands are my backyard, where i grew up. What about all those other kids? Your kids? Those that won't be able to enjoy such an amazing area surrounding Payette Lake. I hear Alec say he cares about McCall and how this area it's so near and dear to his heart, but why destroy that which means so much to you? I believe there have to be better ways to generate the income from the endowment lands. The Department needs to slow down! The Land Board's job is to maximize LONG TERM financial return. There is no point in liquidating land that is rapidly appreciating in value. Idahoans have owned this land since statehood. There is absolutely no rush to do anything right away.

The Department needs to explore conservation easements and recreational leases as a way to help returns while continuing with traditional revenue sources like grazing and logging leases.

The Department must consider the cumulative impacts to other trust responsibilities such as water quality, fish and wildlife resources. Open space, clean air, clean water and access to abundant public lands, are what drives the same markets responsible for the appreciation of endowment lands.

The Department has to get this plan right, in order to prevent future Private Equity firms like Trident Holdings from making attempts at land grabs for all the other attractive public endowment lands across the state. It must be clear in the plan that Idaho is not going to ever consider swapping thousands of acres of the public land anywhere to benefit developers seeking a quick profit from the acquisition of land for pennies on the dollar. The final version of this PELS document must have teeth and an enforcement capability such that IDL can say to future firms like Trident Holdings, "Sorry Trident. Idaho is just not accepting your application for a 28,000-acre land grab. Your proposal runs against our strategy for these lands. Consider trying your luck with the officials in Montana or Utah."

This issue needs to remain in the open light of public scrutiny. I support groups like Payette Endowment Lands Alliance (PELA), Backcountry Hunters and Anglers (BHA), Idaho Wildlife Federation (IWF), Idaho Conservation League (ICL), Greater Payette Water Quality Council (GPWQC), Payette Land Trust (PLT), Brundage Mountain, and local homeowners groups. I support continued engagement with local government, Valley County Commissioners, and the McCall City Council. I support the clear consensus reached by the IDL's own Payette Endowment Lands Focus/Advisory Group's work this past month.

I look forward to seeing IDL officials and Land Board elected officials exhibit the maturity and moral courage necessary to do what is right and send these private equity land developers like Trident Holdings and Alec Williams packing back to New York. Idaho for Idahoans. Keep Public Lands in Public Hands.

Respectfully,
Glenn Dalglish

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:51 PM
To: Comments
Subject: Comment Submitted

From: Michael Lipps at mnlipps@gmail.com
Phone: 8018196225
Address: 7608 W Corona Drive
City: Boise
State: Idaho
Zip Code: 83709

Comment:

Thank you for providing Idaho residents an opportunity to comment on the Payette Endowment Lands. I strongly urge the IDL to follow a long term financial strategy that maximizes financial return. Please consider working with local and regional stakeholders to create conservation easements on these endowment lands. Conservation easements can offer a free market financial return while providing revenue through existing sources such as timber harvest and grazing allotments. Recreational leases can also add revenue sources. The summation of these revenue sources could provide a sustainable long-term strategy that also protects our invaluable waters and wildlife. Thank you for your time and consideration.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:53 PM
To: Comments
Subject: Comment Submitted

From: Boyd Bouwes at Boydbouwes@hotmail.com
Phone: (208) 315-5864
Address: 279 BuckCamp lane
City: McCall
State: Idaho
Zip Code: 83638

Comment:

The idea of trading our public land around Payette Lake to a private entity is quite disturbing. We have been bringing our children to the land, beaches and lake for years. We pick morel mushrooms, huckleberries, hunt deer and elk, fish from the shores and cliff jump. It is a part of who we are in McCall and should not be traded away using some bureaucratic reasoning. The importance that this land plays in the lives of local people should not be measured in pure economic terms but rather the quality of life it provides people. Please do not do a land trade that will only benefit the wealthy. Thank you
Boyd Bouwes

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 9:53 PM
To: Comments
Subject: Comment Submitted

From: Stephen Cobb at firescobb@hotmail.com
Phone: 2083157061
Address: PO Box 366
City: New Meadows
State: Idaho
Zip Code: 83654

Comment:

I'm writing tonight to express my strong disapproval for any attempt to sell or trade the State Lands around Payette Lake. The setting of these lands are best utilized as recreational in nature. While Endowment Lands are supposed to provide income, their sale/trade is irreversible and forever. Any attempt to transfer these lands to private ownership is either short sighted or downright sinister. It appears as though the representatives of Trident are potentially offering relatively low value cut over timber land in exchange for incredibly high value property to be developed. This supposedly equitable trade should not be allowed to proceed. The natural resources of Idaho are what makes our state so attractive for both residents and visitors alike. Land trades of this scale should not and cannot proceed if we are to keep the very essence of our natural landscape(s) whole. Please do not allow these lands to become private.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:07 PM
To: Comments
Subject: Comment Submitted

From: Teresa Cohn at tcwolfenden@gmail.com
Phone: 4062233862
Address: 300 May Rd.
City: McCall
State: Idaho
Zip Code: 83638

Comment:
Members of the Land Board and IDL Staff:

I am writing with concerns over the proposed Payette Endowment Lands Strategy.

First, while I understand generation of revenue as a primary goal, maintenance of excellent water quality in all water bodies affected by these decisions should be of higher priority. These waterways are the lifeblood of our region, economically, ecologically, recreationally, and in support of our entire community wellbeing. Long-term planning of our water resources should be the highest priority of the State of Idaho as a whole, and the Land Board in support of that goal.

Second, I would encourage reconsideration of moving lands from lease to sale in order to generate long-term profit and generate more creative solutions to maintaining public access to priceless lands in one of the most prized ecosystems of our state.

Third, the contiguous nature of endowment lands should be valued, particularly regarding land fragmentation in wildlife corridors and/or near waterways. Piecemeal divisions of these lands should be avoided in order to maintain ecosystem integrity.

Finally, plans for endowment lands should take place in collaboration McCall City and Valley County comprehensive plans, in addition to related efforts, such as the McCall Climate Action Plan and its sustainability initiatives.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Monday, March 1, 2021 11:40 PM
To: Comments
Subject: Comment Submitted

From: Ken Enochs at krenochs@gmail.com
Phone: 2086304285
Address: 608 Woodlands Drive #1841
City: McCall
State: Idaho
Zip Code: 83638-1841

Comment:

State Board of Land Commissioners,

Regarding the Draft Payette Endowment Land Strategy, I urge the Board to include conservation easements in order to ensure lands of significant recreational benefit remain open to the public. Of particular importance are parcels E, G, and H on the east side of Payette Lake, which have the potential for further development of the Payette Lake Trail.

Conservation easements make it possible for a wide variety of users to benefit from the land and bring value to both our forests and our community.

Thank you,

Ken Enochs

To The Idaho State Lands Board:

Thank you for encouraging working together to create management planning for our lands and communities.

The framing of Payette Lake is incredibly beautiful, making an impression at any season, creating lasting memories that enrich and sustain.

This frame is the edge of wilderness, the edge of development and the watershed headwaters. This watershed not only feeds Payette Lake but continues downstream through Valley County lakes and reservoirs and beyond; creating variable irrigation systems.

Emmett farmers and ranchers hold water rights from the Payette watershed for the food and livestock grown and raised, much of which creates an economic base for the state of Idaho.

The economic impacts of this watershed are complex. Weather conditions from snowpack effects to summer drought, effect this watershed. Climate change, management and development need to be addressed by knowledgeable experts.

The watershed is directed and governed by state law that requires irrigation use without loss. These laws stand firm against development.

Idaho law also addresses the preservation of certain lakes as Health Resorts and Recreation Places; section 67 Chapter 43.

sec. 67-4301 Big Payette Lake appropriations of waters in trust for people and

sec. 67-4302 ... the preservation of said water in said lake for scenic beauty, health and recreation purposes necessary and desirable for all inhabitants of the state is hereby declared to be a beneficial use of such water.

DEPT. OF LANDS

MAR 01 2021

BOISE, IDAHO

When considering the future comprehensive planning of the Endowment Lands, please maintain public access for perpetuity.

Create a stakeholder advisory that can oversee and direct, develop new resources of revenue for long term return.

Without intensive well done research of all the diverse and complicated issues, a competent problem solving management plan will not be determined for bettering the future.

The impacts of this decision will set precedent.
Let this be viewed with the deep gravity and weight of responsibility deserved.

Do not be swayed by fast cash proposals and greed,

Concerned,
Lynn Lewinski
713 Broken Rein #596
McCall ID 83638

208.315.0309

PLEASE NOTE THAT I ATTEMPTED TO SEND THIS THRU THE LINK PROVIDED AND IT WENT BLANK!
I AM SCANNING AS WELL AS MAILING A HARD COPY.



File Code: 1560
Date: March 1, 2021

DEPT. OF LANDS
MAR 04 2021
BOISE, IDAHO

Dustin Miller
Director
Idaho Department of Lands
300 N. 6th Street, Suite 103
Boise, ID 83702

Dear Director Miller,

Thank you for the opportunity for the Payette National Forest to be a part of the Payette Endowment Lands Strategy (PELS) Focus Group. While the missions of the Forest Service and the Idaho Department of Lands (IDL) differ, we have enjoyed many years of working in close partnership to address land and resource matters. Being neighbors in a community that cherishes its open space and unfettered access has often made our boundaries nearly irrelevant; and certainly wildfire, insects and disease, and other such natural processes, know no such bounds.

As you know, plans for these endowment lands are of great interest to us. Through this process we will continue to provide thoughtful and productive comments, and we will continue to work with you to help address concerns into the future.

Upon review of the draft PELS, a discussion on wildfire and the Wildland Urban Interface (WUI) was notably absent. As IDL considers future uses for these endowment lands, a recognition of wildfire risk and the increased negative effects on life and property should be addressed. Many of the identified parcels are in the heart of timbered lands with a high wildfire return interval. Wildfire suppression efforts in the WUI can be significantly thwarted by access, as well as the need to provide for public safety.

Forest Service lands along the western border of the city of McCall abut true WUI conditions, while lakeside WUI conditions continue north and to the east bordering endowment lands. The addition of more residential properties and high cost values at risk will significantly compound the issue. The knowledge gained through multi-jurisdictional fire planning and wildfire scenario run-throughs in the area has clearly illustrated that WUI and the compounding factors are the number one concern today, not to mention potential future impacts. With a potential increase in construction of private residences or other high value infrastructure within the WUI, the devastation of private property, loss of life, and an increase in expenditures of tax dollars should be considered.



Continued population growth will not just result in the development of properties adjacent to public lands, but increased visitor use to recreation areas on these public lands, in turn increasing the risk for human-caused wildfires and extending the size of WUI within the area. Even low-density development with limited access further exacerbates this hazard. There are opportunities to reduce fuels in and around these properties, as IDL has done in the past, but over time fuels will continue to accumulate - adding to the increased potential of a catastrophic event without an acceptable probability to mitigate. Even if fuels are modified, there is always potential for wildfire to have a negative impact, and the sale of lands to private entities will not guarantee the same fuel mitigation practices that have been shown to improve wildfire outcomes. With continued residential development, our margin of success will be further reduced, posing an increased risk to life and property as has been seen in the complete loss of entire communities in California and Oregon in recent years.

Access to public land not only for fire suppression, but for recreation, is also of concern. Many of the parcels in Tier III and IV provide access between the community and Forest Service public lands as shown on the attached map. This map displays the critical connections as well as infrastructure on National Forest System Lands adjacent to IDL lands. It further shows Forest Service easements on roads that pass through IDL lands as well as a road and trail without easements that the Forest Service has interest in acquiring. Patrons of public lands utilize these easements to recreate on the Payette National Forest year-round. Recreation continues to be an economic driver for local communities and recognizing the value and community connection to these IDL lands is important. Unfortunately, recreation and its economic benefits are not fully addressed in the draft (PELS).

The inclusion of descriptions of known recreation facilities and areas used for dispersed recreation activities is vital. The importance of access opportunities such as roads, trails, and parking lots to areas where hunting, berry picking, hiking, winter and summer sports, and a host of other activities, that occur on these endowment lands cannot be diminished.

Currently, the Payette National Forest is considering the addition of trails and recreation facilities in the greater McCall area. These trails will provide enhanced opportunities for the public which, in turn, supports our local economy. Destination locations such as Bear Basin, Fall Creek, Twah Creek, Copet Creek, Brush Creek and the east side of Brundage Mountain are key areas where a level of reduced access through current IDL lands could affect future recreation opportunities for Idahoans and tourists alike. Ensuring that access and recreational opportunities are maintained and enhanced is an important consideration for the future of IDL lands.

To meet the needs of the community and land management entities, we highly encourage the development of a community-wide comprehensive recreation strategy for the area surrounding McCall. This strategy would be a way to enhance opportunities and

connectivity between communities and public lands within, and outside of, the City of McCall's Area of Impact. The importance of developing this recreation strategy is paramount, and the Forest Service will be a contributing partner of such an effort. This type of strategic plan would be beneficial in terms of identifying those high value areas, including additional economic opportunities that could benefit IDL, and could be critical in determining potential uses, development, or disposition for parcels. Additionally, this information could help in identifying those areas where additional lands transactions such as acquisitions or exchanges would be advantageous, and where conservation easements may be possible.

As mentioned at the first Payette Endowment Lands Focus Group discussion, disposition could include land exchanges or acquisitions. Though we understand that this is not the time to discuss specific parcels, there are several checkerboard properties that we may want to discuss in the future that can be advantageous to both the Forest Service and IDL.

Sincerely,

**LINDA
JACKSON**

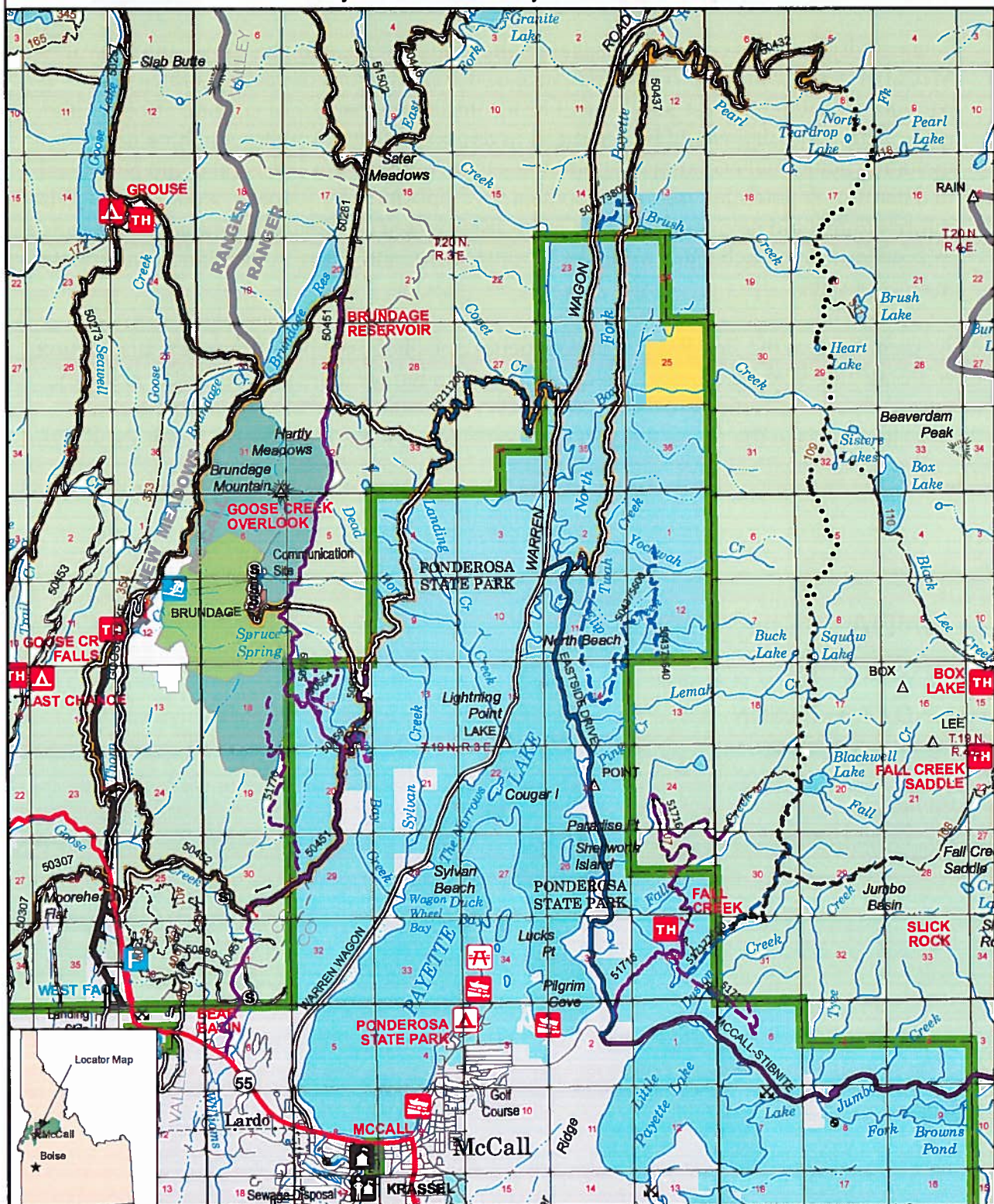
Digitally signed by
LINDA JACKSON
Date: 2021.03.01
14:11:16 -07'00'

LINDA L JACKSON
Forest Supervisor

Enclosure
cc: Brian Harris



Payette National Forest: Adjacent Forest Service Facilities and Uses



Special Uses Permits Surrounding Endowment Lands

- Ⓢ Permitted Special Uses Areas
- IDP Primary Overhead Power Lines

Road Easement Status

- Open Roads With No Easements
- Closed Roads With No Easements
- Open Roads With Existing Easements
- Closed Roads With Existing Easements

Brundage Permit Ski Area

- Lift Served Area Boundary
- Private Land
- Ski Area Permit Boundary

Recreation Opportunities Surrounding Endowment Land

- Vehicles less than 50"
- Open to Motorcycles
- Non-Motorized Trails
- Winter Motorized Travel Routes

Recreation Site

- BOAT RAMP
- CAMPGROUND - FS
- CAMPGROUND - NON-FS
- RD OFFICE

Supervisors Office / HDQTRS

- TRAILHEAD
- PARKING
- PICNIC / REST AREA - NON-FS
- SKIING - DOWNHILL

Administrative Forest Boundary

- Forest Service
- State Surface Ownership
- Bureau of Land Management
- Private
- State



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Date: 2/22/2021

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From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Tuesday, March 2, 2021 12:01 AM
To: Comments
Subject: Comment Submitted

From: Curtis Spalding at ccspalding@comcast.net
Phone: 4254469651
Address: 2621 Hillside Lane
City: Everett
State: Washington
Zip Code: 98203-1491

Comment:
March 1, 2021

Dear Idaho State Land Board Members:

Comments on the IDL Draft Payette Endowment Land Strategy

As an owner of properties in McCall and a former resident, I am familiar with the State Lands around McCall and the significant role they play in the quality of life of the community. I am also familiar with the mandates of the State Constitution for management of those lands. The IDL Draft Payette Endowment Land Strategy is a golden opportunity to stage for a sustainable long-term future of the lands and their financial contribution to the State. Meaningful and unrushed public involvement will be essential to achieve these.

State Lands here in Washington have already gone through the stages you are going through in Idaho for the trust properties around Payette Lake. Here, it has been essential that the needs of all sectors of the public are truly heard, and that planning integrate with the expressed needs of surrounding State Park, National Park, National Forest, communities, and private land owners. My suggestion is that the Idaho State Land Board follow these precedents in practice.

Working on the first Payette Land Trust conservation easements, I am aware of the untapped potential of that mechanism in Valley County. I believe these easements can be significant tools in the application to State Lands in Valley County and especially the Payette Lake area. I am therefore supportive of all the excellent suggestions submitted the Lands Board by the Payette Land Trust in their March 1 comment letter; and I incorporate those comments in that letter by reference here.

I have reviewed the comments of the Payette Endowment Lands Alliance to the Land Board on this subject, and I fully support them and incorporate them by reference herein. The long-term health and sustainability of Payette Lake and the watersheds that surround it must be first and foremost in the Land Board's Payette Endowment Strategy. The present draft of that strategy goes part way toward that goal but falls short. The 20-year plan must take the perspective of 200 years, not just 20, in projecting the long-term environmental benefits and adverse impacts of the plan. The plan must be long-term. It must be comprehensive. It must benefit local Valley County communities, Idaho communities, and beyond. It must protect and preserve the water quality of Payette Lake and all its tributaries, including its terrestrial watersheds to ridgelines. The plan must not categorically dispose of public lands; it must do so site-specifically. It must fully recognize and maximize sustainable recreation income streams as well as amenity values. It must calculate long-term environmental benefits and fully account for degradation from industrial timber production. It must be visionary.

Thank you.

Sincerely,
Curtis Spalding
2621 Hillside Lane
Everett WA 98203

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Tuesday, March 2, 2021 12:38 AM
To: Comments
Subject: Comment Submitted

From: Christine Waller at Zaknchristi@hotmail.com
Phone: 208-602-2722
Address: 12 Charters Dr
City: Donnelly
State: Idaho
Zip Code: 83615

Comment:
For sale? NO. Park Passes for revenue sure. Fees for day use sure.. Leased or sold for private use? NO.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Tuesday, March 2, 2021 1:35 PM
To: Comments
Subject: Comment Submitted

From: Kelly Martin at kmartin02@gmail.com
Phone: 2083157454
Address: 171 Finn Church #745
City: McCall
State: Idaho
Zip Code: 83638

Comment:

I would like to be acknowledged as a concerned citizen of Valley County ID and would like to go on record as opposed to selling State lands to corporate developers. I am in favor of protecting these lands and public trust lands for future generations

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Tuesday, March 2, 2021 10:55 PM
To: Comments
Subject: Comment Submitted

From: Bill Wright at bwright1802@icloud.com
Phone: 2086303150
Address: PO 1802
City: McCall
State: Idaho
Zip Code: 83638

Comment:

Please don't give away my backyard! The second thang these out of state people buy is a NO truss pass sign. Boise Cascade sold 1/2 of my yard already please don't give away the other side of the yard. I retired IDL (sitpa) I gave up 31 summers to fight fire and protect these same Lands. Most of my hunting access is already closed off road closures, fences or housing. Don't give away Idaho to the highest bid. Please Thank you Billy Please Governor

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Tuesday, March 2, 2021 11:45 PM
To: Comments
Subject: Comment Submitted

From: Elisabeth Weisel at joy.weisel.copy@gmail.com
Phone: +12089019709
Address: 4321 Plum St
City: Boise
State: Idaho
Zip Code: 83703-4420

Comment:

These lands are the reason so many of us who had the privilege of growing up in the state of Idaho have loved it. They are the reason so many of us stay. I hope to be able to take my own children to these very spaces for hikes, camping trips and to get generally teach them about the beautiful place we are charged with caring for. Allowing this land to be privatized would be a travesty, one we are already seeing the effects of in Boise.

From: Department of Lands <no-reply@idl.idaho.gov>
Sent: Wednesday, March 3, 2021 8:58 AM
To: Comments
Subject: Comment Submitted

From: Annie Mosier at Mosballs82@gmail.com
Phone: 2087841494
Address: 2525 N Woody Dr
City: Boise
State: Idaho
Zip Code: 83703

Comment:

I am writing to request that the idaho land board not sell their land around McCall. That area is so important and used by all people. If the land is sold, it will be used by those that have money. Please keep the land accessible to everyone.

From: tonislaymaker@frontiernet.net
Sent: Thursday, March 4, 2021 3:18 PM
To: Comments
Subject: Comment submitted but not registered on IDL website

Hello

I wrote this comment at 4:30 pm on Sunday on your web site but couldn't be sure it registered and sent. So, sending to this email address as you recommended.

Thank you!

Subject: Payette Endowment Lands

Dear Governor Brad Little and Members of the Land Board,

I am strongly opposed to the sale or transfer of Public Endowment Lands around Payette Lake and McCall.

I believe the proposed Trident land swap will have a detrimental impact on the health of our tourism based economy - which emphasizes open space and recreational opportunities for all - as well as Payette Lake water quality, wildlife, and the quality of life enjoyed by the citizens of McCall, Valley County and Idaho.

Payette Lake is only 8 square miles compared to Couer d'Alene Lake at 148 square miles. This is a fragile ecosystem which should be preserved and protected for generations to come.

Viable, long term sustainable sources of revenues including conservation and recreation options such as leases, license fees and easements should be identified and initiated in lieu of a bulk, wholesale disposition of McCall area endowment lands.

Thank you for the opportunity to comment.

Sincerely,

Toni Slaymaker
1635 Lakeridge Drive
PO Box 2449
McCall, ID. 83638

Cell 208.315.0846

From: Diane Plastino Graves <plastinograves@gmail.com>
Sent: Monday, March 15, 2021 11:40 AM
To: Governor@gov.idaho.gov; bwoolf@sco.idaho.gov; lawrence.wasden@ag.idaho.gov; ldenney@sos.idaho.gov; sybarra@sde.idaho.gov
Cc: Dustin Miller; Bill Haagenson; Ryan Montoya; Scott Corkill; Tammy Armstrong; Renee Jacobsen; bbenjamin@sco.idaho.gov; chad.houck@sos.idaho.gov; darrell.early@ag.idaho.gov; kbennett@sde.idaho.gov; nate.fisher@gov.idaho.gov; sam.eaton@gov.idaho.gov
Subject: Recommendations from PELS Focus Group
Attachments: PELS Consensus Statement-Final (2).pdf

Dear Governor and members of the State Board of Land Commissioners,

The Payette Endowment Lands Strategy Focus Group, appointed by the Idaho Department of Lands, held three meetings in late January and February, 2021, to evaluate the Payette Endowment Lands Strategy (PELS) that will come before the State Board of Land Commissioners March 16, 2021.

While most of our group have also sent you individual summary comments of their view of the PELS, I am pleased to send you, on behalf of the Focus Group, **a consensus statement of our recommendations on this exceedingly important document**, signed by all members of the Focus Group that are community representatives, and those representing businesses, City and County governments, and nonprofits. That document is attached to this email.

We are sending this to you today as the Valley County Commission was only able to meet this morning to approve this document.

As mentioned in the attached statement, current Focus Group members stand ready to assist the Idaho Land Board and the Idaho Department of Lands in continuing to plan the most desirable long-term strategy for these precious and beloved lands in Valley County.

Most sincerely,

Diane Plastino Graves
member, PELS Focus Group

cc: Director Dustin Miller and IDL staff;
staff of members of the Idaho Board of Land Commissioners.

Consensus Statement on the Payette Endowment Lands Strategy
Focus Group Members
March 15, 2021

Preamble:

We represent the Focus Group that the Idaho Department of Lands (IDL) and Idaho Board of Land Commissioners (Land Board) convened to provide input on the draft Payette Endowment Lands Strategy (PELS). We thank IDL for seeking our input. In further support of IDL and our responsibilities as members of this Focus Group we present this summary consensus statement.

We recognize and support the Land Board's constitutional responsibilities with respect to endowment lands and its fiduciary duty to manage these lands "to secure the maximum long term financial returns" to the endowment beneficiaries. The endowment lands in the greater Payette Lake area are fundamental to the social, recreational, ecological, economic and communal values of the citizens of Valley County and its visitors. We believe endowment lands can be managed to maximize the long-term return to the endowments, while recognizing the needs of the local community, including watershed protection, recreational opportunities, and resource management.

We also recognize that, as trustees, the Land Board and the Governor have a duty to comply with federal and state environmental laws, including statutory and constitutional provisions that protect public trust interests, including Payette Lake.

In support of IDL, we offer the following three recommendations:

1) These endowment lands contribute to long-term returns of the overall trust through appreciation. **We recommend that IDL develop new protocols to incorporate and consider this appreciation and identify opportunities to increase revenue in ways that protect the lands and Payette Lake, including protocols for conservation easements, recreation leases, and recreation districts.**

These new protocols would also provide a framework to support IDL's consistent evaluation of proposals and could improve public understanding of the process.

Conservation and recreation activities could be supported through city or county-led efforts , possible acquisition of certain parcels by the Idaho Department of Parks and Recreation, public/private initiatives, and/or other local, county, state or federal partnerships. We have seen support building for this in the community.

2) **We support IDL taking time to further develop the PELS** by considering and incorporating comments, focus group discussions, and other input, along with consideration of the existing City of McCall and Valley County Comprehensive Plan.

While this work is being done, **we recommend maintaining the moratorium on disposal of lands within the McCall Area of Impact until sufficient guidance can be developed on the use of conservation easements and other revenue diversification strategies.** If warranted, lifting the moratorium on typical and traditional leases (i.e. grazing, cottage sites, mineral and recreational) may be appropriate, while retaining the moratorium on any permanent dispositions (i.e. sales or exchanges) until the PELS is finalized.

3) Finally, we encourage continued commitment to working with stakeholders, including the City of McCall and Valley County, through final draft development and implementation of the PELS. Should IDL need additional support or involvement of the Focus Group, we stand ready to offer our assistance.

Signed:

Bradley B. Compton, Idaho Sportsmen

Dave Bingaman, Valley County Commissioner, on behalf of the Valley County Commission

Robert S. Giles, Mayor of McCall, on behalf of the McCall City Council

Diane Plastino Graves, McCall community member

Nick Harris, Burgdorf Hot Springs

Tera King, Idaho Forest Group

Robert Looper, Brundage Mountain

Julie Manning, Payette Endowment Lands Alliance

Jonathan Oppenheimer, Idaho Conservation League

Brian Scott, Boise community member

Kristin Hoff Sinclair, McCall community member, Brightwater Homeowners Association

Clive Strong, Boise community member

David Simmonds, Big Payette Lake Water Quality Council, Inc.

Craig Utter, Payette Land Trust

(Community, business, city and county stakeholders - Members of the Payette Endowment Lands Strategy - Focus Group)

From: Craig Utter <craigutter@payettelandtrust.org>
Sent: Tuesday, March 16, 2021 10:43 AM
To: Renee Jacobsen
Subject: 3-16-21 Payette Land Trust in person comments
Attachments: PLT Comments land Board March 16 2021- letterhead.pdf

Renee,
Attache are my comments from today.
Thanks

--

Craig Utter
Payette Land Trust, Executive Director
309 E. Lake Street
McCall Idaho 83638
PLT office phone: 208-634-4999

Payette Land Trust

Conserving the rural landscape of West Central Idaho
a nonprofit 501 (c)3 Conservation Organization

March 16, 2021

State Board of Land Commissioners,

On Friday March 12th Payette Land Trust submitted 2 applications for conservation easements on parcels G and H, essentially east side drive. This submission is a direct result of Governor Little's request for "Out of the Box" thinking on the McCall Endowment issues and for solutions which work statewide.

It is also the result of PLTs involvement in the PELS process and participation in the Focus Group sessions. Sessions which amassed a diverse set of stakeholders and generated ideas which brought consensus from the group.

PLT heard the Governors call for workable solutions loud and clear. We submitted the applications in a direct response to the request for proposals to increase the long-term revenue on these lands while conserving the traditional uses, natural habitat, access and water quality.

The applications were not submitted in haste but rather the result from years of work on this issue. We began investigating a path to conservation around Payette Lake in 2018, eventually making the Payette Lake Conservation Project the centerpiece of our 2019 Payette River Basin Initiative. In 2020, the discussion surrounding the Land Boards fiduciary duty in relation to traditional uses elevated as development values continued to rival those of timber.

Born in 1993, out of the need to balance conservation and development, PLT now wants to bring its 28 years of experience weaving together agriculture, timber and recreation into conservation easements as a tool to help manage Endowment Lands around the Lake.

By purchasing the easement at fair market value, the fiduciary requirement of the Land Board will be met. The Endowment will continue to own the land and benefit from any future revenue derived from the leasable activities remaining under the easement.

Purchasing a conservation easement on Idaho Endowment land has never been done before. Given the time to establish the necessary protocols, IDL and PLT could successfully create this management tool resulting in a win for the Land Board, a win for the community and most importantly a win for the Lake and the Land.

Respectfully,

Payette Land Trust Board of Directors

Rick Fereday, President

James Fronk, Vice President

Gary Thompson, Treasurer

Michael Eck, Director[CU1]

Robert Vosskuhler, Director

Regan Berkley, Director

Suzanne Rainville, Director

Ryan Thomasson, Director

Craig Utter, Exec. Director

Payette Land Trust

309 E Lake Street McCall Idaho 83638 | 208-634-4999 | Info@Payettelandtrust.org | Payettelandtrust.org