



WILDERNESS WATCH

Keeping Wilderness Wild

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Dear Forest Service Staff,

The following comments come from Wilderness Watch on the proposal by the City of Missoula to breach the dam at McKinley Lake in the Rattlesnake Wilderness in Montana. Wilderness Watch is a national wilderness conservation organization focused on the protection and proper stewardship of all units of the National Wilderness Preservation System, including the Rattlesnake Wilderness. Our national headquarters is located in Missoula.

We support removing the dam. The 15-foot-high dam was built on a natural lake a century ago in order to increase water available for downstream irrigation and municipal use. Because the dam is in poor condition and the water is no longer used for either purpose, the city, which owns the dam, is proposing to breach it and return the area to its natural condition.

But it is also important to the integrity of Wilderness how the work gets done. The city is leaning toward airlifting or driving heavy equipment into the Wilderness, because it has no familiarity with any other way to do the work. But heavy equipment clearly isn't necessary. It is entirely possible to do the work the "wilderness way," that is, accessing the site on foot or horseback and using traditional, non-motorized tools to get it done. The dam was built without motorized equipment, and much larger projects have been accomplished without modern machinery.

We will upload a pdf document of examples of significant projects successfully conducted in designated Wilderness using traditional skills and non-motorized means. There is no reason that the breaching of the McKinley Lake dam could not also be accomplished using traditional skills.

The city owns the dam and has a 100-year-old easement that gives it the right to maintain or remove the dam. The legislation that established the Rattlesnake Wilderness granted the dam owner the right to "necessary motorized use" over existing trails to operate and maintain the dam. But since the dam is on national forest land, the Forest Service has some say in how the dam is accessed and the kinds of work that is done on site.

The Forest Service has the authority and responsibility to set the terms and conditions for access to the dam and what occurs around the dam in the course of its removal. The FS needs to use this authority to insist the city explore and implement feasible means of non-motorized alternatives to breach the dam. This is especially important because the city owns dams on seven other small lakes in this Wilderness, and this McKinley Lake project is presented as the pilot project for dealing with the other dams. As a pilot project, it is especially important to establish the feasibility of doing the project the right way in Wilderness.

We offer the following, more specific comments:

- We support removing the McKinley Lake dam in the Rattlesnake Wilderness, but the work to remove the dam must be completed in a wilderness-compatible way that respects the integrity of the Wilderness.
- The Forest Service should fully explore and encourage the city to implement a non-motorized alternative for breaching the McKinley Lake dam. The dam was built without motorized equipment, and the dam can be breached without motorized equipment. Motorized use isn't "necessary" under the terms of the 1964 Wilderness Act for breaching the dam and shouldn't be allowed.
- The Forest Service should also prepare an independent analysis on the feasibility of removing the dam using traditional skills. It isn't acceptable to rely on the project proponents for this analysis. The project proponents have no responsibilities under the 1964 Wilderness Act and don't have the expertise in wilderness stewardship that the Forest Service has.
- There is an important public interest in preserving Wilderness and the skills required to work in Wilderness. The Forest Service should provide its expertise and resources to ensure this project is completed in a wilderness-compatible way.
- Since this is a "pilot project" that will set the tone for how other dams are breached or removed in the Rattlesnake Wilderness, it is especially imperative that alternatives to motorized equipment are thoroughly analyzed and implemented.
- The Forest Service must conduct a Minimum Requirements Analysis (MRA) for this project. It is vital that the Forest Service conduct its MRA in the context of the 1964 Wilderness Act. The MRA must not be influenced by those who want the project completed in the quickest way possible (which would probably be done with motorized and mechanized equipment), as mentioned on page 2 of the scoping letter, but rather conducted under the requirements of the Wilderness Act that direct the agency to the "minimum" non-motorized and non-mechanized means.

Sincerely,



Kevin Proescholdt
Conservation Director