



WILDERNESS WATCH

Keeping Wilderness Wild

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Sent via email: samantha.treu@mt.gov

Dear Montana Department of Natural Resources and Conservation,

Wilderness Watch is providing these comments on the draft Environmental Assessment (EA) for the McKinley Lake Dam Decommissioning Project. Wilderness Watch is a national wilderness conservation organization headquartered in Missoula, Montana. Our mission is the protection and proper stewardship of lands and waters in the National Wilderness Preservation System, including the Rattlesnake Wilderness.

Wilderness Watch supports the breaching of the McKinley Lake Dam in a manner that complies with the letter and spirit of the 1964 Wilderness Act. Our specific comments follow.

1. The Preferred Alternative in the draft EA will seriously degrade the wild character of the Rattlesnake Wilderness with 42 helicopter flights, 34 other motor vehicle trips, and various kinds of motorized equipment. The flights, motor vehicles, and motorized equipment would all violate provisions of the 1964 Wilderness Act, 16 U.S.C. 1131-1136. The prime directive of the Wilderness Act is to preserve the wilderness character of these Wildernesses that Congress has designated. The Preferred Alternative will degrade the wilderness character of the Rattlesnake Wilderness.

2. The EA has failed to adequately consider wilderness-compatible means of breaching the dam. There is no meaningful analysis of alternative ways to complete the breaching project that are more compatible with Wilderness preservation. Rather, the EA simply makes conclusory statements such as, "...[motorized uses are] imperative components of the proposed action that cannot be eliminated without jeopardizing the purpose and need for the project," suggesting that non-motorized options are infeasible. There is no evidence offered to support this conclusion, nor is there any analysis of a traditional skills alternative or of any non-motorized alternatives. This failure is unacceptable. **The dam was built without motorized equipment, certainly it can be breached without it.**

An alternative that uses human labor to breach the dam and restore the natural channel should have been considered. The project requires removing an estimated

500 cubic yards of earth from the dam and hauling it approximately 200 feet to a deposition site. If a worker moves just 5 cubic yards per day (approx. 25 wheelbarrow loads), it would take only 100 person-days or a crew of 10 people 10 days to breach the dam. Adding time for moving rip-rap and rehabbing the site still completes the bulk of the project in less than one month, and at a fraction of the cost of the proposed action.

An alternative that relies on using explosives should have been considered as a separate alternative or in combination with the hand-labor alternative described above. This would make the option of using hand labor even more effective and certain to achieve the purpose and need of the project. The Forest Service considers explosives to be a “primitive” tool that is compatible with Wilderness stewardship, and both DNRC and the Forest Service are familiar with using explosives to breach dams.

As a “pilot project” in Wilderness that will set the tone for removing all or most of the remaining nine dams in the Rattlesnake Wilderness, it is especially important to give wilderness-compatible means a serious consideration for the breaching of the McKinley dam. Unfortunately, the EA fails this test. The EA states, “As such, a pilot project will be instrumental in helping the City, partners and the USFS understand regulatory obstacles, public interest and goals, decommissioning costs and other factors that will significantly affect not only the vision for this pilot project but future projects as well.” Yet the analysis does nothing to aid in better understanding any of those things.

As a “pilot project,” the project should be testing Wilderness-compatible means for completing the task. Instead, it proposes to use methods—heavy construction equipment—that are used hundreds of times a day all over the world to move around relatively small amounts of earth (500 cubic yards). So it begs the question of what might be learned from the pilot project? In terms of wilderness-compatible projects, nothing will be learned that will be helpful on the other Rattlesnake dams.

Further, as discussed later, nothing will be learned about more economically beneficial options. The approach selected for the pilot project is the most expensive option. One would think the least expensive option might be tested for the pilot project, especially when public funds are being used.

3. The estimated cost of the Preferred Alternative further suggests the analysis is woefully inadequate. The city’s initial estimate for decommissioning the McKinley Lake dam and restoring the site was \$172,591 (2018 Water Systems Master Plan, Chapter 9, Rattlesnake Dams Feasibility Study). That estimate has now exploded to \$621,800, more than 3.5 times the initial projection. At the same time, the Forest Service has been provided with an independent engineer’s estimate that the project can be completed in a single season using traditional skills (non-motorized “primitive tools”) for substantially less than \$100,000. This further suggests a failure of the EA to look at reasonable alternatives to the proposed action, or even to independently analyze the proposed action itself.

4. The EA public participation analysis mentions a survey conducted by the City of Missoula, but apparently gave no consideration to the results of the survey. The vast majority of respondents supported breaching the dam and doing it with traditional (non-motorized) methods. Why does the draft EA ignore the results of the City’s survey? Similarly, the Forest Service scoping process also resulted in the vast majority of respondents preferring a traditional skills option for removing the dam. The EA needs to take into account that input as well.


5. The EA needs to consider the impacts of proposed helicopter and heavy equipment use on grizzly bears, a listed species under the federal Endangered Species Act. Grizzlies are increasingly found in and around the Rattlesnake Wilderness, and helicopters are known to disturb the bears. Has the state of City of Missoula consulted with the U.S. Fish and Wildlife Service on the proposed helicopter use and its impacts on grizzlies? If so, that information should have been disclosed in the EA. Indeed, the federal Endangered Species Act requires such a section 7 consultation.

6. The EA must not be finalized until AFTER the U.S. Forest Service has completed its Minimum Requirements Analysis (MRA). Even then, an MRA checklist is NOT a substitute for full environmental analysis of the impacts to the Rattlesnake Wilderness. The environmental impacts of this project on the Rattlesnake Wilderness are not at all adequately analyzed in the Draft EA, other than a mere mention in the table on page 44. This is unacceptable. There must be an analysis of these impacts on the Rattlesnake Wilderness, and an MRA worksheet will not suffice.

7. The Rattlesnake Wilderness is part of the National Wilderness Preservation System. What is authorized in the Rattlesnake Wilderness has implications for the entire National Wilderness Preservation System (NWPS). The lands and waters of the Rattlesnake Wilderness are national interest lands and waters, belonging to all citizens throughout the country. The implications of this project are not just confined to the City of Missoula or to the State of Montana, but to the entire nation. Moreover, there are more than 100 dams in the NWPS. The City of Missoula and the State of Montana have the opportunity and obligation to present and future generations to show that project involving these dams can and will be accomplished in a wilderness-compatible manner. McKinley Lake is a good and relatively easy place to start.

Thank you for considering our comments.

Sincerely,


Kevin Proescholdt
Conservation Director