



July 29, 2009

Deb Mucklow
District Ranger
Spotted Bear Ranger District
PO Box 190340
Hungry Horse, MT 59919

RE: Removing the tri-motor airplane wreckage from Big Prairie

Dear Deb:

Wilderness Watch is providing these comments in response to the scoping letter on the request to remove the remaining pieces of the Ford Tri-Motor airplane from the vicinity of Big Prairie in the Bob Marshall Wilderness.

As you probably know, this isn't the first time a proposal like this has surfaced. It was rejected in the past and should be again. The fact that the district is now promoting the project suggests serious slippage in its wilderness stewardship program.

Wilderness Watch supports removing the pieces of aircraft from the Wilderness, however we oppose the project as proposed. The use of aircraft or any other motorized or mechanized equipment for the task would violate the Wilderness Act, Department of Agriculture regulations, and Forest Service policy.

The Wilderness Act prohibits the use of aircraft in Wilderness unless such use is necessary to meet the minimum requirement for preserving the Wilderness. What remains of the plane has lain where it is for more than 70 years. Removing it is not necessary for preserving the Wilderness, and even if it was the use of motorized equipment is not the minimum required to remove it. If removing the wreckage is the minimum requirement, it can be packed out in pieces by pack stock or backpack.

In addition, the central mandate of the Wilderness Act is to protect the area's wilderness character, which the Forest Service's framework for monitoring wilderness character shows would be harmed by any use of motor vehicles. This requirement alone precludes the use of a helicopter for removing the wreckage. Removing the wreckage could enhance the area's wilderness character, but that doesn't change the fact this potential benefit can be achieved by non-motorized means.

Department of Agriculture regulations also prohibit the landing of aircraft in Wilderness including airlifting materials, supplies or persons from aircraft, unless such use is necessary to meet minimum requirements for protecting the area. Again, removing the wreckage is not necessary, and, even if it was, the use of motor vehicles is not the minimum required.

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Forest Service Policy also directs the agency to forego motorized equipment for projects such as this one. The policy places Wilderness preservation above other considerations, unless directed otherwise by law or regulation:

Where there are alternatives among management decisions, wilderness values shall dominate over all other considerations except where limited by the Wilderness Act, subsequent legislation, or regulations. FSM 2320.3.1

When a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness. FSM 2320.6

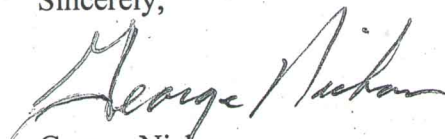
Wilderness Watch encourages the Forest Service to work with the Museum on a plan that will remove the wreckage in a manner compatible with Wilderness and consistent with the law. Taking apart the wreckage in a manner that allows for later reassembly, and packing it out on foot or horseback, might not be the museum's preferred method, but the agency's primary responsibility is to the Wilderness, not to private interests.

Much of the allure of mountain flying is that it takes place in wild, remote country. When the story of this tri-motor is told, that allure is likely to be heightened if part of the story is that the wreckage was packed out on mules from deep in the Bob Marshall Wilderness. Conversely, plucking wreckage from a mountain with a helicopter is rather pedestrian, and seems to detract from what it is that makes mountain flying unique.

In short, from a wilderness stewardship perspective the wreckage of this aircraft is no different than any other junk that may have been left behind decades ago. Its removal must adhere to the strict, non-mechanized standards of the Wilderness Act. If the museum decides not to remove the wreckage in a fashion compatible with Wilderness, Wilderness Watch strongly urges the Forest Service to undertake the effort itself in order to put this long-festering issue to bed. We would be happy to work with the agency on a plan for dismantling and removing the wreckage by non-mechanized means.

Please keep us informed on any future action on this proposal. Please correct Wilderness Watch's address on your mailing list. The scoping letter was sent to the wrong address and just reached our office a few days ago.

Sincerely,



George Nickas
Executive Director

cc: Chris Ryan, Wilderness Specialist, Region 1