

# SAVE OUR CANYONS

September 6, 2024

Re: Save Our Canyons Comments - Emerald Lake Shelter Reconstruction Project

Dear Mr. Hansen,

Thank you for the opportunity to comment on the proposed reconstruction of the Emerald Lake Shelter in the Mount Timpanogos Wilderness Area. While it is clear the current structure is dilapidated, I write to express Save Our Canyons concern with the use of motorized equipment and tools to reconstruct the shelter in the proposed project area, as well as the use of helicopters in designated Wilderness Areas to carry such equipment to and from the project site.

Save Our Canyons objects to the use of motorized equipment and tools in any designated Wilderness Area in the Wasatch Mountains, including in the project area surrounding the Emerald Lake Shelter in the Mount Timpanogos Wilderness Area. While we acknowledge the historical significance of the structure, we believe that its reconstruction using motorized equipment is not in line with preserving the wilderness character of the area. The presence of such a structure could invite vandalism, graffiti, and litter, further degrading this wilderness environment, unless maintained on a regular basis. Because the stated purpose and need of the project is to better preserve wilderness character, we request that any planning efforts to preserve this character are also in accordance with upholding core aspects of the Wilderness Act of 1964 and the Utah Wilderness Act of 1984. The Utah Wilderness Act of 1984 states that, "each Wilderness Area designated by this act shall be administered... in accordance with the provisions of the Wilderness Act of 1964 governing areas designated by that act as Wilderness."

Furthermore, we are concerned about the proposed use of power tools and helicopters in this Wilderness Area, which violates the core principles of the Wilderness Act. We request clarification on where the U.S. Forest Service believes it derives the authority to waive these requirements. Specifically, how does the USFS justify the use of motorized equipment in maintaining or reconstructing structures within designated Wilderness Areas?

We propose that instead of reconstruction, the remaining debris should be removed, leaving the foundation and fireplace intact. An informational sign could be placed at the site to educate visitors on the history of the structure and promote Leave No Trace principles.

If the USFS proceeds with reconstruction of the Emerald Lake Shelter, Save Our Canyons strongly objects to the use of power tools and helicopters in the Mount Timpanogos Wilderness. According to the Utah Office of Historic Preservation, the original shelter was constructed using materials and equipment brought in by horseback. To honor and preserve the spirit of this special wilderness, we urge that any reconstruction efforts adhere to this same non-motorized approach.

Thank you for considering our concerns and for the opportunity to participate in this important decision-making process. We look forward to your response and continued dialogue on this matter.

Sincerely,  
Spencer Shaver  
Executive Director  
Save Our Canyons

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