

# SAVE OUR CANYONS

July 24, 2025

Russell L. Hanson Jr.  
District Ranger  
390N 100E, Pleasant Grove, UT 84062

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

Dear Mr. Hanson,

Thank you for the opportunity to comment on the proposed reconstruction of the Emerald Lake Shelter in the Mount Timpanogos Wilderness Area. Save Our Canyons values the cultural history and function of the shelter, but we reiterate our significant concern with the proposed use of motorized equipment and tools, including helicopters and jackhammers in the reconstruction process. We believe the justification for dismissing alternatives that genuinely consider the use of hand tools and pack animals was prematurely made and insufficiently rigorous, especially when evaluated against the core principles of wilderness preservation and the Forest Service's administrative guidance.

The Draft Environmental Assessment (EA) outlines the necessity for motorized equipment and tools, such as concrete mixers, power tools, helicopter sling loads, and small motorized equipment, citing "site constraints, safety, and to ensure the structure is reconstructed in a manner that can withstand natural forces". It explicitly dismisses the alternative of "Using only hand tools" because it would be "inefficient, unsafe due to shelter conditions, and would also significantly extend the time taken to accomplish either alternative". For material transport, the EA states it has been "deemed unpracticable to use pack animals" due to "challenging terrain and environment," "Trail degradation since the time of construction," and concerns from pack animal users themselves about "undue risk to the livestock and their caretakers".

However, we find several shortcomings in these justifications when referencing the sources:

- **Contradictions in Minimum Requirements Analysis Framework (MRAF) Guidance:**
  - The MRAF's "No Effect" rating for "Transportation of Supplies" (via helicopter) and "Tools (Motorized and Traditional)" on "Solitude or Primitive and Unconfined Recreation" in Alternative 1 is inconsistent. The MRAF's own narrative acknowledges these activities "may be negatively impacted by the area needing to be closed during helicopter operations and may be visible and audible by visitors... and by use of minimal motorized tools". The Draft EA further confirms a "direct effect on solitude". The justification that these impacts are "already accounted for under the Undeveloped quality" is problematic. "Solitude" and "Undeveloped" are distinct wilderness qualities. Accounting for impacts in only one category, despite explicit effects on both, undermines a complete and

transparent analysis of wilderness character and renders the entire analysis of Alternative 1 inadequate.

- The MRAF references Forest Service Manual (FSM) 2323.13b, which states that shelters needing "extensive maintenance" should be "removed". The proposed use of helicopters and motorized tools for the reconstruction of the Emerald Lake Shelter and dismissing hand-tool alternatives strongly implies this work is "extensive". This reasoning directly contradicts the MRAF's explicit guidance, which prioritizes "least impact to the wilderness resource" over efficiency or project duration. If the work truly necessitates such heavy mechanization, it suggests the project crosses the threshold for removal, rather than reconstruction, especially considering the shelter was originally built using non-motorized methods like packhorse trains and non-motorized tandem vehicles.
- The Draft EA cites "inefficient" and "significantly extend[ing] the time taken" as primary reasons for dismissing the hand-tool alternative. This directly contradicts the MRAF workbook's guidance, which makes no reference to inefficiency and time requirements as a reason for dismissing an alternative. The MRAF's purpose is to determine "how to accomplish it with the least impact to the wilderness resource", rather than to point to the most convenient option. Even without the inclusion of impacts to "Solitude" of helicopters and motorized tools, the impact rubric clearly points to Alternative 4 and 5 as the lowest impact options. This raises the question of whether the MRAF analysis was arbitrary and capricious, suggesting a predetermined outcome based on convenience.

- **Disregard of Historical Construction Methods:**

- The evidence used to claim the use of pack animals would be unfeasible is insufficient. The "MtTimpHikeStructuresHistory.pdf" document clearly states that the Emerald Lake Shelter itself was originally constructed from 1957 to 1959 using "material, including sand, rock and cement hauled up by packhorse train" and "massive steel structures were toted up-trail on a two-wheels-in-tandem vehicle". This historical fact directly challenges the EA's claim that using pack animals is "unpracticable" or "unfeasible" due to terrain or trail conditions today. If pack animals and non-motorized tandem vehicles were successfully used to transport "massive steel structures" to the site in the past, their use cannot be unilaterally dismissed as "unfeasible" now without a far more robust, and specific, technical analysis that directly addresses the historical methods and why they are impossible *today*.
- While the EA also mentions "safety", it does not provide sufficient detail to demonstrate that the safety risks of hand tools or pack animals cannot be mitigated, particularly in light of historical precedent. Indeed, it seems like there would be a variety of risks from utilizing helicopters and motorized tools.
- Though the EA states local stock owners would be unlikely to contribute to this project, no formal Request for Information (RFI) or quotes have been included in

the project documents. Conducting a formal RFI process is necessary to fully understand and quantify the willingness of stock owners.

- While the EA notes "Trail degradation since the time of construction", it fails to address why trail improvements cannot be completed as a part of this project, which would also have lasting benefits to trail users by improving access, and wilderness quality by limiting user trails in undeveloped areas.
- One of the five qualities of wilderness character explicitly managed for is "Other Features of Value," which includes historical value. Replicating the historical construction methods (hand tools and pack animals) would more closely align with preserving this "feature of value" and the very "historical use justifications" cited for the shelter's importance. The *Utah Wilderness Act of 1984* itself lists preserving "scenic and historic resources" as a purpose of wilderness designation.

### **Our Recommendation:**

Save Our Canyons asks that the MRAF process be amended or substituted to address our concerns regarding procedural integrity. We further request that the alternative "Using only hand tools for the Proposed Action" be reconsidered and analyzed in detail, including a formal RFI process and trail improvements. We support the effort to preserve the historic nature and function of this structure, but we object to the use of helicopters and motorized equipment 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. Because the shelter was initially built in such a non-motorized manner, we believe it can and should be done again.

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,

Jack Stauss  
Executive Director  
Save Our Canyons

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