

AGENDA SUMMARY
GRAND COUNTY COMMISSION MEETING
SEPTEMBER 1, 2020

Agenda Item: M

TITLE:	Discussion regarding the Bureau of Land Management's (BLM) "Adjacent Right-of-Way Holder Notification" for the Seven County Infrastructure Coalition (SCIC) proposal to pave 35 miles through the Bookcliffs to connect Seep Ridge Road in Uintah County with I-70 in Grand County
FISCAL IMPACT:	N/A
PRESENTER(S):	Commissioner Hawks

Prepared By:
 COMMISSIONER
 JAYLYN HAWKS

FOR OFFICE USE ONLY:
Attorney Review:
 N/A

RECOMMENDATION:

Discussion only.

BACKGROUND:

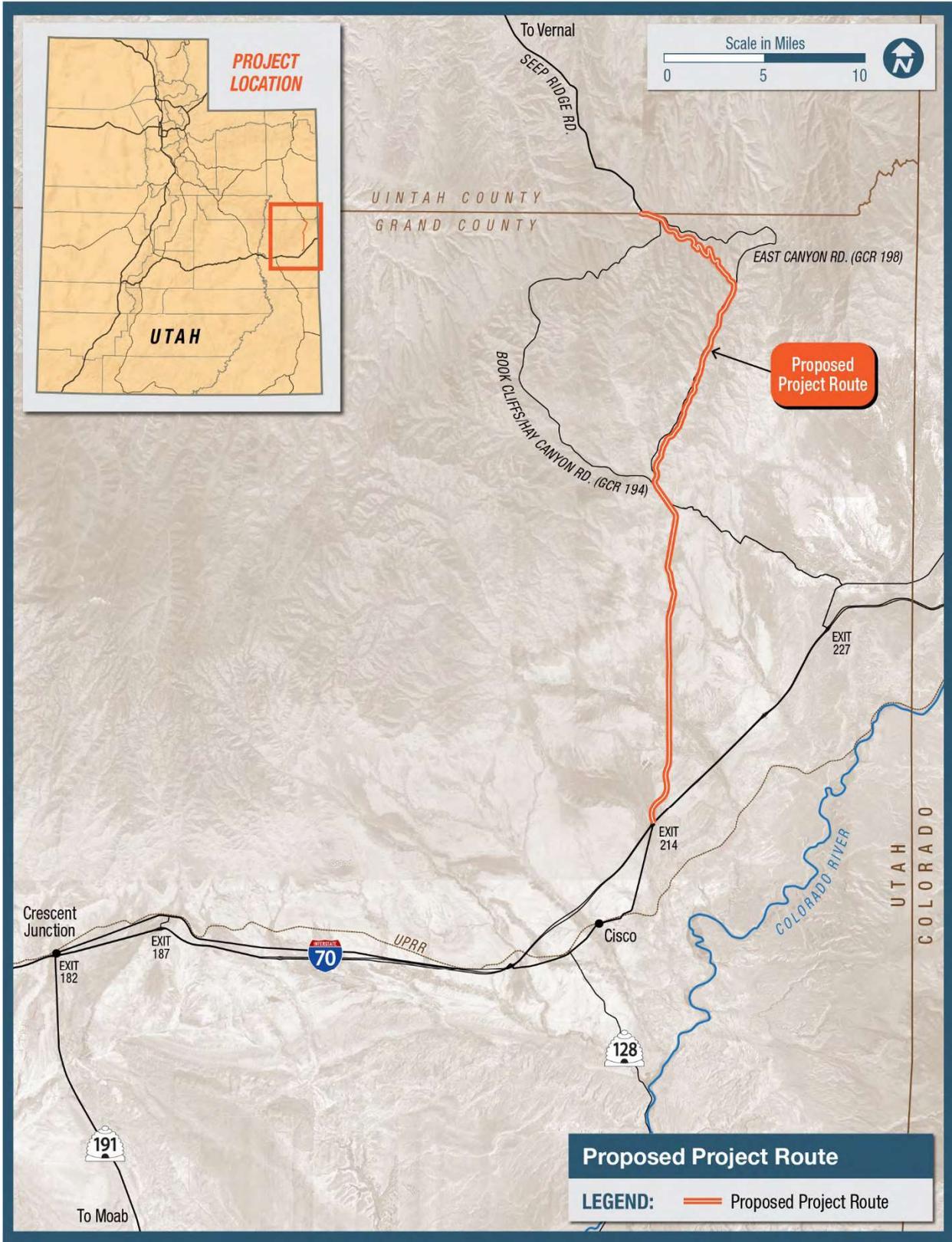
On August 28, 2020 Grand County received the above mentioned letter from the BLM. This discussion is to briefly review the history of the "Bookcliffs Highway", assess our options, and outline a path to move forward.

The Bookcliffs Highway proposal has undergone many iterations since it's inception many years ago. Initially, it was sold as an "Energy Corridor" and referred to as the 'Hydrocarbon Highway'. Next it was billed as a "Utility Corridor". After that, it was called a 'Tourism Road' that would be a great asset to Grand and promote additional tourism. There may have been other titles (including 'Transportation Corridor,' but the most recent title is the "Eastern Utah Regional Connection (EURC) Road."

Attachments:

- ERUC Proposed Route
- Book Cliffs Highway Fact Sheet
- BLM Response to ROW Application

Exhibit 1: Project Location Map



Oppose the Book Cliffs Highway

Talking Points:

- 1) This highway is being presented to us by the Seven County Infrastructure Council as a road for tourism, while their application clearly states that the road is needed to spur further dirty energy extraction in our precious and wild Book Cliffs. There are already two similar highways connecting Vernal and Moab (191 through Price and 139 through Loma). US Highway 191 has the added benefit of taking visitors through Price and surrounding lands, which helps boost the economy of central Utah as well.
- 2) This is not a road for "tourism." The road would cut down travel time from Vernal to Moab by a mere 15-25 minutes (27 miles). There are two existing scenic highways that allow the same access from Dinosaur National Monument, with similar travel times (see attached fact sheet for calculations). The real decrease in travel time would be from the oil fields and tar sands mine in southern Uintah County to I-70, as described in the initial ROW application, not from these tourist destinations.¹
- 3) The cost of this project is outlandish. Ongoing maintenance and winter upkeep would be very expensive. The SCIC is now saying that the State of Utah will take over building and financing the road. **Why should state taxpayers cover the cost of the proposed Book Cliffs Highway when the main entities to benefit from the project are large oil and gas or tar sands companies?** We don't need to further subsidize the struggling fossil fuel corporations with state taxpayer money.
 - This project would likely cost around \$150,000,000, if not more, with yearly maintenance at least \$1,370,000.
 - Even if the SCIC says they'll pay, their money is coming from the CIB, which would otherwise finance other projects in our rural counties that are more necessary: i.e. care facilities, libraries, recreation centers, bridges, water projects. There is not an infinite pool of CIB money.



¹ These are my calculations using Google Maps and the predicted 46 minute travel time from PR Spring to I-70 at Exit 214 discussed in UDOT feasibility Study. The estimation for travel time is rudimentary for the East Canyon Section. It assumes an average of 55 mph and does not take into account vertical grades, acceleration, or deceleration, which are likely factors in East Canyon. See the table below for details.

- 4) There are other projects in need of attention from UDOT, like increasing safety on the dangerous stretch of Highway 191 between Moab and Price.
- 5) Both the City Council and the County Council have been taking excellent steps to increase our community's sustainability in the face of climate change. It would be a shame to do all that work only to encourage more oil and gas production in the northern end of our county at the same time. We're on a path to transition away from fossil fuels, let's make sure that taxpayer money goes towards that, not subsidizing the fossil fuel industry.
- 6) If the highway were built, we would see an increase the mortality for big game and a decrease in the quality of hunting experience in the Book Cliffs. An estimated 138 mule deer, 5 elk, 1 mountain lion, and 1 black bear would be killed each year as a result of the highway.
- 7) Archeological Resources up and down the canyon would be impacted, even potentially a Ute burial site.

Travel Time Comparisons

Travel Routes	Miles*	Minutes of Travel*
Vernal to Moab via Price	227	3h 57m
Vernal to Moab via Rangely	217	3h 41m
Vernal to Moab via East Canyon w /Book Cliffs Highway	190	3h 16m
DIFFERENCE (between Book Cliffs Highway and the fastest existing route through Rangely)	27	25m
Book Cliffs Highway Breakdown		
Vernal to PR Spring	86	1h 33m
East Canyon Segment **	41	46m
Exit 214 - Moab	63	57m
Total Book Cliffs Highway:	190	3h 16m
Note: The SCIC tries to inflate the time savings from Vernal to Moab, saying it would be 35-45 mins. Depending on google for the day, time savings range from 15-25 minutes.	*According to Google Maps. Check out this saved map. Click on the three dots to the right of each section to see step by step directions and time estimates.	**According to UDOT Feasibility Study , page 25. This estimation does not account for steep grades, acceleration, or deceleration.

A Timeline of the 1990s Book Cliffs Highway Controversy:²

- Nov. 1988 -After a highly controversial proposal to create a toxic waste incinerator in Cisco, two of the three county commissioners promoting the incinerator were ousted from office by substantial margins.
- Nov. 1988 -A citizens initiative blocked the toxic waste incinerator.
- During the Lame Duck session, the three county commissioners created the Grand County Special Service Road District. The sole purpose of the district was to construct Grand's portion of an 83-mile paved highway through the Book Cliffs. All mineral lease funds that Grand County was to receive for decades to come were committed to the roads district.
- Moab City Council voted to reverse its support of the Book Cliffs Highway
- 1992 : the Utah Division of Wildlife Resources opposed the Book Cliffs road.
- Sept. 1992 - Draft EIS on the project (Ouray to Interstate 70) was released, preferring the alternative that did not widen any existing right-of-ways and simply paved sections as they were. Many unresolved issues were outlined including significant threats of rockslides, significant impacts to stream channels, big game populations, and cultural resources.
- Fueled by the actions that created the Special Service Road District, a voter initiative changed the Grand County Commission from a three-person commission with administrative authority to a seven-member council that is strictly legislative.
- Feb. 1993, the newly elected council immediately dissolved the road board's administrative authority, preventing the board from spending more money.
- After that, another citizen's initiative forced the recall of six of the seven new council members.
- November 1993- all six members were again elected
- The mineral lease funds were redirected to the recreation, the hospital/extended care facility, and the solid waste special service districts.

²Timeline taken from "A History of the 1990's Book Cliffs Highway Controversy" by Craig Bigler at the Times Independent. Accessed at <https://moabtimes.com/2009/07/23/3018755-a-history-of-the-1990s-book-cliffs-highway-controversy/>

More Current Events Relating the Book Cliffs Highway

- 2013- 2016 : The Book cliffs Highway was at the center of controversy in Rob Bishops public lands bill, labeled a "public utility corridor" which ultimately fell apart.³
- August, 2014 : Recall petition for Lynn Jackson launched as SCIC / Book Cliffs Highway controversy Mounts.⁴
- October 2014: The Grand County Council joined the Seven County Infrastructure Coalition despite public uproar.
- January, 2015: After the election, the Grand County Council rescinded the previous council's resolution to join the regional Seven County Infrastructure Coalition over concerns involving the Book Cliffs Highway

Facts and unresolved issues regarding the Book Cliffs Highway

(From the 1992 EIS on the East/ Brusher Canyon Alternative)

- 44,000 feet of stream channel realignment (taken from the 1992 EIS)
- Existing and potential landslide areas were identified in Brusher and **East Canyons** as part of a geological investigation of the Proposed Route
- The Brusher/ East Canyon Alternative would be located on approximately 11 miles of flood-prone areas along the floor of East Canyon. These areas are managed such that flood prone areas are not disturbed unless other reasonable alternatives to disturbance are not available.
- The proposed highway would increase the potential for future flooding at the ranch (confluence of Hay and East) by increasing flood elevations.
- The Brusher/East Canyon Alternative would result in decreases in habitat use on 17,600 acres of important (high value, critical value) mule deer range, 17,600 acres of important (substantial value, high value, critical value) elk range, 17,600 acres of potential mountain lion range, and 17,600 acres of potential black bear range. The Brusher/East Canyon Alternative would result in an estimated annual road kill mortality of 138 mule deer, 5 elk, 1 mountain lion, and 1 black bear.
- The total value of big game animals lost to road kills annually would be approximately \$269,406.

³ <https://www.hcn.org/issues/48.3/the-failed-compromises-of-rep-rob-bishops-public-lands-masterplan>

⁴ http://www.moabsunnews.com/news/article_189fb69c-2e13-11e4-b816-001a4bcf6878.html

- 19 known cultural sites occur within the 200-foot-wide study corridor along the Brusher/East Canyon Alternative. These 19 cultural sites include 1 lithic scatter, 3 lithic scatter/campsite combinations, 1 campsite, 4 rock art sites, 6 rock art/rock shelter combinations, 3 rock shelter occupations, and 1 Ute burial site.

Estimated Project Cost:*

Construction for East Canyon Route: \$157 Million

Maintenance Estimate (20 years): \$27 Million

Yearly Maintenance: \$1.35 million

* These estimates are from the [Book Cliffs Transportation Corridor Study](#), others have ranged as high as \$418 million in construction costs with annual maintenance and operating costs as high as \$3.89 million.

SCIC Feasibility Study:

Declared cost:

Most likely: \$278,600,000

Minimum: \$195,000,000

Maximum: \$417,900,000

Cost per mile: 42 miles

Most likely: \$6.6 million per mile!

Minimum: \$4.6 million per mile!

Maximum: \$9.95 million per mile!

Annual Maintenance and Operating Costs:

Most likely: \$2,595,000

Minimum: \$1,815,000

Maximum: \$3,890,000

UDOT Grand County to Uintah County Connection Final Feasibility Study (2014):

Construction Estimate:

East Canyon Low Range \$112.6 Million

East Canyon High Range \$198.7 Million

Cost Per Mile Low Range \$2.8 Million

Cost Per Mile High Range \$4.9 Million

Yearly maintenance cost estimate for East Canyon: \$1.2 million

Total Capital Costs for Road Maintenance (on top of yearly maintenance): \$5.6 million



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Moab Field Office
82 East Dogwood
Moab, Utah 84532

In Reply Refer To:
2800 (LLUTY01200)
UTU-94230

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
7018 0680 0001 3074 3172

Seven Counties Infrastructure Coalition
Attn: Mike McKee
751 East 100 North
Price, Utah 84501

Dear Mr. McKee:

On March 6, 2019, The Bureau of Land Management (BLM) received an application from Seven County Infrastructure Coalition (SCIC) for a right-of-way (ROW) on BLM National System of Public Lands for the purposes of constructing and operating the Eastern Utah Regional Connector (EURC) road in Grand County, Utah. The following public lands are affected by your application:

Salt Lake Meridian,
T. 20 S., R. 24 E.,

Sec. 29, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 20, SE $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 21, NW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 9, SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$,
NW $\frac{1}{4}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 4, SW $\frac{1}{4}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$,
Lot 4, Lot 3.

T. 19 S., R. 24 E.,

Sec. 33, Lot 1, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 28, SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 21, SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 9, SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 4, SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, Lot 3.

T. 18 S., R. 24 E.,

Sec. 33, SE $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 28, SE $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$,

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Sec. 21, SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$,
NE $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 9, SE $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$,
NW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 8, NE $\frac{1}{4}$ NE $\frac{1}{4}$.

T. 17 S., R. 24 E.,

Sec. 29, SW $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 28, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 21, SW $\frac{1}{4}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$,
SE $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 15, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 10, SW $\frac{1}{4}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 3, SW $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ SE $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, Lot 1.

T. 16 S., R. 24 E.,

Sec. 35, SE $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 26, SE $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 25, SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 24, SW $\frac{1}{4}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$,
NW $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 13, SW $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$,
SW $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 12, SW $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$;
Sec. 11, SE $\frac{1}{4}$ SE $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$,
NW $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$;
Sec. 10, NE $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 3, SE $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$,
SE $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, Lot 4;
Sec. 4, SE $\frac{1}{4}$ NE $\frac{1}{4}$, Lot 1, Lot 2.

T. 15 $\frac{1}{2}$ S., R. 24 E.,

Sec. 33, SW $\frac{1}{4}$ SE $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, Lot 5, Lot 4.

The BLM assigned serial number **UTU-94230** to your application. Please refer to the serial number in all future correspondence relating to this project.

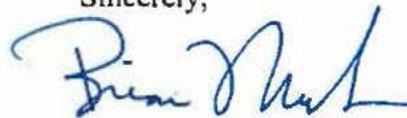
After reviewing the application and supporting documentation, the BLM determined that the application is incomplete. Below is a summary of the additional information needed to move the application forward.

1. The provided GIS shape file of the road alignment does not directly overlay the existing Grand County road system. The application states that the proposed road would replace existing Grand County roads. Please specify if the provided alignment is correct, and if so, what is the proposed plan to deal with the deviation between the proposed EURC road and existing Grand County roads?

2. SCIC's application mentions both short-term and long-term ROWS. The application does not contain specific information about the short-term ROWS, only that "the size of short-term right-of-way varies by location and will be refined and finalized as design advances." As part of our National Environmental Policy Act analysis, the BLM needs more detailed information about all proposed short-term ROWS, such as access roads, staging areas, etc. Please provide size and location information for all short-term ROWs needed, as well as a map, or GIS shape file, marking the location of the required short-term ROWS.
3. The Grand County Council and the Uintah County Council held a public meeting on April 16, 2019 discussing various topics, including the EURC road. The Uintah County Council, of which SCIC board Co-Chair Brad Horrocks is a member, stated that they were unaware that the SCIC submitted the ROW application. Uintah County Council also stated that their understanding of the road was that it would be a "people" road promoting connectivity and tourism, not a "hydrocarbon highway." The Uintah County Council stated that they didn't anticipate the road to be constructed to accommodate heavy truck traffic. Please address the discrepancy in the stated purpose and need for the road.
4. The application states, among other resources impacted, that the proposed EURC road ROW would impact the existing pipeline ROW along the East Canyon Road. It goes on to state "the existing pipeline would be considered and addressed in the engineering and design processes." Existing ROWs cannot be adversely impacted by the EURC road, so please provide additional information demonstrating what the plan is to address existing ROWS within the proposed roadway. Also, please provide additional information about the EURC roads impact to existing oil and gas wells and leases, producing and non-producing.
5. The submitted SF-299 form does not adequately address number 12, which states "Give statement of your technical capability to construct, operate, maintain, and terminate system for which authorization is being requested". The statement provided by SCIC on the application is "The Coalition, in conjunction with the State of Utah, has the technical and financial capability to construct, operate, maintain, and terminate the system for which authorization is being requested." Due to the nature of the project and estimated cost of approximately \$150 million, please provide specific information documenting that SCIC is financially solvent and able to construct and maintain the proposed EURC road.
6. Page four of the SF-299, which was not included in the application, requires information regarding the formation and authorization of SCIC. Please provide a completed page four of the SF-299 with the necessary attachments.

If you have any questions, please contact Lisa Wilkolak, Realty Specialist, at (435) 259-2122 or lwilkolak@blm.gov.

Sincerely,



Brian Mueller
Acting Field Manager