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Leah M. Fisher
Senior Project Manager
U.S. Army Corps of Engineers
Leah.M.Fisher@usace.army.mil

Jason Gibson
Chief, Nevada/Utah Regulatory Section
U.S. Army Corps of Engineers
Jason.A.Gibson@usace.army.mil

Re: Proposed Utah Lake Restoration Project Permit Application SPK 2018-00503

Dear Leah Fisher and Jason Gipson,

We are requesting you to reject the Utah Lake Restoration Project permit application SPK 2018-00503 because it is incomplete and does not meet the U.S. Army Corps of Engineer's' (Corps) application requirements.

After carefully reviewing the submitted application, we believe the provided information is insufficient to satisfy the Corps' regulations. See 33 C.F.R. § 325.1. The attached document—an excel spreadsheet—clearly illustrates how and where the application fails to satisfy the Corps' permit application checklist. This easy-to-follow illustration leads to the conclusion that the application must be rejected.

In fact, the application does not provide adequate detail for the Corps or the public to evaluate the effects of dredging, the suitability of the islands for development, the consequences of constructing a city on those islands, or the nature of the unidentified "restoration" activities. As shown in the illustration, nearly every section of the application has major deficiencies, with key components, descriptions, and data missing to support applicant's claims, assertions, and plans. The degree of missing information is so substantial that defining the scope and areas of investigation for a comprehensive Environmental Impact Statement is unachievable. The Corps should not initiate the process of preparing an EIS based on incomplete and missing information.

To ensure a thorough and transparent permitting process, the Corps' regulations set forth fundamental requirements for every permit application. It is the burden of the applicant to comply with these requirements. LRS has failed to satisfy these prerequisites, putting the Corps and the public on unfair footing from the outset. Pursuant to its regulations, the Corps deny LRS's application as incomplete or defer the requisite NEPA process until a complete application is filed.

We are happy to provide additional detail if this would be helpful to the Corps.

Thank you for your consideration of these concerns,

Dr. Brian Moench,
Utah Physicians for a Healthy Environment

Zach Frankel
Utah Rivers Council

Heather Dove
Great Salt Lake Audubon

David Bennett
Utah Citizens Advocating Renewable Energy

Stan Holmes
Stop the Polluting Port Coalition

Raphael Cordray
Utah Tar Sands Resistance

Deeda Seed
Center for Biological Diversity