



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Office of the Lieutenant Governor

LAYLA BASIC
Office Administrator

JORDAN SCHWANKE
Local Entity Specialist

December 22, 2025

Coal Creek (formerly Riddermark) Incorporation Seventh Request for Feasibility Study Determination

Dear Mr. Atkin and Anderson,

On December 5, 2025, the Utah Population Committee (UPC) determined that the Modified Request for Feasibility Study (Modified Request) filed on December 1, 2025, does not comply with the contiguity requirements described in Utah Code §10-2a-201.5. Additionally, the Office of the Lieutenant Governor (OLG) determined that the verified signatures and property ownership did not meet the required 10% of private land area. Data supporting the determination can be found below.

Utah Code §10-2a-206 states that each modified request shall comply with Utah Code §10-2a-202(1) and (2). Additionally, Utah Code §10-2a-206(1)(c)(ii) states that “a signature on a [Original Request for Feasibility Study] may be used toward fulfilling the signature requirement of [the Modified Request for Feasibility Study] unless the modified request proposes the incorporation of an area that is more than 20% larger or smaller than the area described by the original request in terms of private land area...or...value of private real property.” **Because the Modified Request proposed an incorporation of an area 21.20% less than the Original Request for Feasibility Study, original property owner signatures are invalid.**

Utah Code §10-2a-202 states that the process to incorporate an unincorporated area as a municipality is initiated by an individual filing a feasibility request that:

- A. includes the signatures of the owners of private real property that:
 - a. is located within the area proposed to be incorporated
 - b. covers at least 10% of the total private land area within the area; and
 - c. is equal in value to at least 7% of the value of all private real property within the area.

Totals for entire proposed incorporation area:

- Total market value: \$32,992,165
- Total private land area: 754.692 acres

Totals for verified signatures and verified property ownership:

- Total market value: \$2,807,197
 - % of market value: 8.51%
- Total private land area: 53.32 acres
 - % of private land area: 7.07%

According to Utah Code §10-2a-204(2)(a), the OLG has rejected the Modified Request for the proposed Coal Creek (formerly Riddermark) Incorporation. In accordance with Utah Code §10-2a-204(4), sponsors may, subject to Utah Code §10-2a-206, amend the Modified Request to correct the deficiencies and re-file with the OLG by **March 22, 2026, at 11:59 P.M., 90 days after the day on which the OLG rejected the Modified Request.** If you do not submit an amended Modified Request for Feasibility Study to the OLG by March 22, 2026, at 11:59 P.M., or the amended Modified Feasibility Study request does not comply with Utah Code §10-2a-202, the incorporation process cannot proceed.

Please contact us if you have any questions.

Regards,

Jordan Schwanke
Local Entity Specialist
Office of the Lieutenant Governor

Memorandum

December 5, 2025

To: Jordan Schwanke, Local Entity Specialist, Office of the Lieutenant Governor
From: Megan Rabe, Demographic Research Associate, Kem C. Gardner Policy Institute
CC: Mallory Bateman, Dir. of Demographic Research, Kem C. Gardner Policy Institute
Subject: Coal Creek Modified Feasibility Review

Introduction

The Utah Population Committee, at the request of the Utah Lieutenant Governor’s Office on December 2, 2025, reviewed the area of Coal Creek in Iron County to determine whether it meets the population, population density, and contiguity requirements for incorporation as a town as defined in Utah Code 10-2a-201.5.

Coal Creek does not meet the contiguity requirement and as such a population estimate and density estimate were not made.

Table 1: Initial Feasibility Requirements for Coal Creek Incorporation

Criteria	Meets Criteria?	Requirement by Statute	Coal Creek Details
Population	NA	To incorporate as a town, the population must be at least 100.	Estimate not made, contiguity requirement not met.
Population Density	NA	Density must be 7 people per square mile or higher	Estimate not made, contiguity requirement not met.
Contiguity	No	Area is contiguous, does not have strip of land connecting geographically separate areas	Proposed boundary does not cover a contiguous area.

Note: Requirements are summarized; Full statutory requirements are delineated in Utah Code 10-2a-201.5.

Detail on Contiguity of Proposed Boundary

The proposed boundary of Coal Creek does not meet the requirements for contiguity. A contiguous boundary does not include a circumstance where “two areas of land are only connected by a strip of land between geographically separate areas; and the distance between the geographically separate areas... is greater than the average width of the strip of land connecting the geographically separate areas,” ([Utah Code 10-2a-102](#)).

The current boundary contains a strip of land where the distance between geographically separate areas is greater than the average width of those strips (see Figure 1). The approximate dimensions of the strip in question are as follows:

- **Strip A:** 511 feet long by an average width of 498 feet

The calculation for average width depends on the shape of the polygon. To approximate the average width at Strip A, we used the following equation:

$$\text{average width (ft)} = \frac{\text{area (ft}^2\text{)}}{\text{length (ft)}}$$

The area of Strip A is approximately 254,590 ft² and the length is 511 ft, resulting in an average width of approximately 498 ft.

Figure 1: Proposed Coal Creek Boundary

