

Link Flats

Instant Study Area

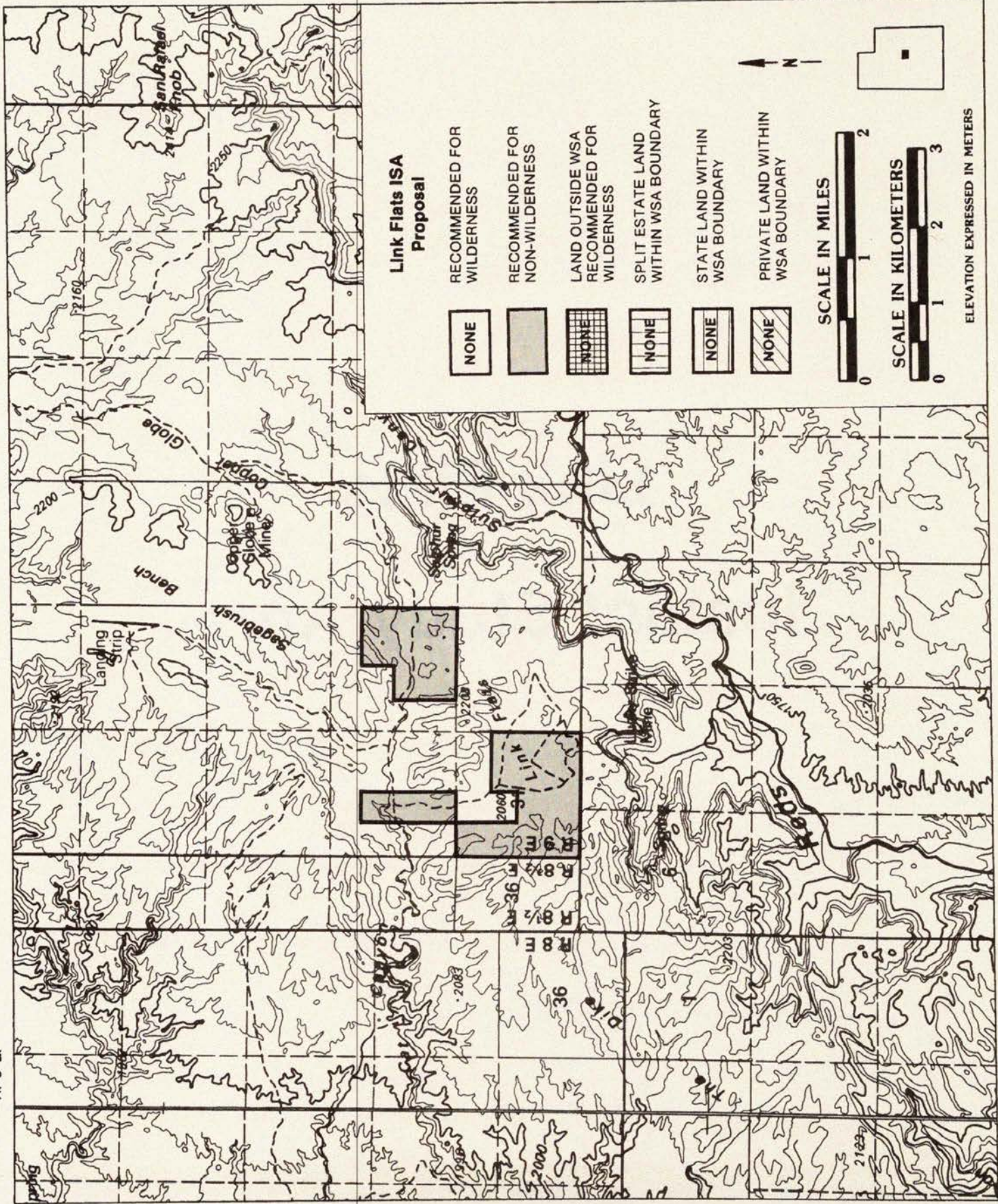
LINK FLATS ISA

R. 9 E.

R. 8 E.

T. 23 S.

T. 24 S.



STATISTICAL SUMMARY

Link Flats Natural Area

Emery County, Utah

Moab District, BLM

	North/South	Total Acres	ISA Acres	Previous Designated Area	Contiguous Lands		
					UT-060-025	UT-060-007	UT-050-233*
Acres in Inventory Area	North:	24,210	160	0	24,050	---	---
	South:	219,842	752	0	---	150,930	68,160
Acres without wilderness characteristics	North:	14,600	160	0	14,440	---	---
	South:	188,482	752	0	---	119,570	68,160
Acres with wilderness characteristics	North:	9,610	0	0	9,610	---	---
	South:	31,360	0	0	---	31,360	0
Acres recommended suitable for designation	North:	0	0	0			
	South:	0	0	0			(Suitability study scheduled to begin (no suitability study scheduled) 1984 - San Rafael RA MFP-A)
Acres recommended not suitable for designation	North:	160	160	0			
	South:	752	752	0			

* UT-050-233 is in Wayne County, Richfield District.

OWNERSHIP OF LANDS WITHIN BOUNDARIES OF WILDERNESS STUDY AREA (1981)

Area	Gross Total Acres	Public (BLM) Lands	State Lands	Private Lands
Link Flat ISA	912	912	0	0
UT-060-007	163,490	150,930	12,480	12,480
UT-060-025	25,330	24,050	1,280	80
UT-050-233	---	68,160	---	---

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INTRODUCTION

The Link Flats Natural Area was formally designated as an ISA by the BLM in accordance with the Federal Land Policy and Management Act (FLPMA). The Link Flats Instant Study Area (ISA) was inventoried in 1979, studied, and found to be nonsuitable for wilderness designation. This recommendation was documented in a Wilderness Report dated March 21, 1980, which was prepared following guidance given in OAD 79-40. The nonsuitable recommendation was reported in the Federal Register on May 5, 1980 and was subsequently protested as reported in the Federal Register on June 18, 1980. The earlier Wilderness Report has been revised and expanded in accordance with guidance given in OAD 79-40, Changes 1 and 2.

RECOMMENDATION

The Bureau of Land Management recommends to the Secretary of the Interior that Congress not designate the Link Flats Natural Area (Link Flats Instant Study Area) as wilderness. The area has been inventoried and studied in accordance with the provisions of FLPMA (P.L. 94-579) and was found not to possess wilderness characteristics as described in the Wilderness Act (P.L. 88-577). The area is not suitable for wilderness designation and should be released from interim management restrictions applicable to lands under wilderness review.

Samuel R. Rowley
Area Manager, San Rafael Resource Area

12/1/81
Date

Kenneth V. Rhee
District Manager, Moab District

12/1/81
Date

Robert G. Robinson
State Director, Utah

1/8/82
Date

Director, Bureau of Land Management

Date

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RECOMMENDATION SUMMARY STATEMENT OF REASONS FOR THE RECOMMENDATION

Review for Wilderness Characteristics: By itself, the ISA was found not to possess the primary wilderness characteristics of size, naturalness, and outstanding opportunities for solitude or primitive and unconfined recreation. The ISA was found to contain some supplemental values (wild horse range, scenic values). When considered with the contiguous roadless areas, the ISA and the adjacent areas meet size requirements but lack naturalness and outstanding opportunities for solitude or primitive and unconfined recreation.

Size: The ISA contains 912 acres of BLM-administered public lands (originally reported as 792 acres). This is less than the 5,000 acre requirement.

Naturalness: The ISA contains approximately 4 miles of roads (one of which bisects the ISA), 1 mile of travelled way, 2 miles of visible wheel tracks (probably associated with claim assessment work), and a stock reservoir. The ISA has lost its natural character.

Solitude: The lack of significant topographic or vegetative screening within the ISA, plus its configuration, makes it difficult to avoid sights and sounds of others within the unit. The ISA lacks outstanding opportunities for solitude.

Primitive and Unconfined Recreation: The level to rolling topography of the ISA and absence of focal features do not contribute either to outstanding opportunities for one type of primitive recreation or to a diverse recreational spectrum. The configuration of the ISA further limits opportunities present. The ISA does not contain outstanding opportunities for primitive and unconfined recreation.

Supplemental Values: The ISA possesses supplemental values related to a wild horse range and some scenic values. The Natural Area was established to protect an association of plants that was thought to be ungrazed. These species are still present but the association does not appear to be ungrazed.

Contiguous Areas: The ISA is contiguous with two BLM roadless areas. One is a 24,050-acre parcel to the north and the other is a 219,090-acre parcel to the south. These are separated by a road running through the ISA. While each of these two areas contain a WSA identified during the Intensive Inventory, neither WSA lies next to the ISA and both differ in character from the ISA. Areas adjacent to the ISA were determined not to possess wilderness characteristics. Consideration of contiguous areas eliminates problems associated with the size and configuration of the ISA. However, the adjacent areas do not possess

outstanding opportunities for solitude or primitive and unconfined recreation, and in some cases lack naturalness. Contiguous areas enhance scenic supplemental values.

Economic and Social Impacts: If Link Flats is not designated as a wilderness area, there will not be any significant impact on socioeconomic values. This conclusion was reached after considering the ISA's potential for affecting the economy and social environment of the area. The small area is used for two basic economic activities, livestock grazing and mineral exploration access. Its social values are associated with its potential for providing recreation and livelihood for a limited number of people. The overall impact on the economy and social values will not be significant if the recommended action is taken.

Long-Term and Short-Term Effects: Long-term and short-term effects of the recommendation are assumed to be negligible. The area would remain at status quo with some grazing, mineral exploration access, and motorized recreation uses continuing. The Natural Area is segregated from mineral entry and surface use or occupancy. The short-term effect would be to release the area from Interim Management Policy (IMP) restrictions now applicable, although activities within the area are minimal.

Present uses include grazing, access for mineral exploration, and motorized recreational vehicle use. No hiking or camping uses are presently known to exist. Of the present uses, motorized vehicle access and recreational use would be incompatible with wilderness designation, while grazing at 1976 levels would be compatible.

Options Foregone: If the recommendation is adopted and the ISA is not designated as a wilderness area, wilderness management options would be foregone. Other options foregone would be management practices dedicated to wilderness enhancement and preservation. The ISA currently enjoys a measure of protection as a Natural Area; this would not be changed by the recommendation. Activities allowed would be managed to prevent unnecessary and undue degradation.

Recommendation and Study Area Suitability: The ISA was inventoried for wilderness characteristics as provided in the Wilderness Inventory Handbook and studied in accordance with OAD 79-40, 79-40 Changes 1 and 2. The ISA was found to lack the wilderness characteristics of size, when considered on its own, and of naturalness

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and outstanding opportunities for solitude or primitive and unconfined recreation when considered either on its own or in conjunction with the contiguous roadless areas.

State and local governments were informed of the inventory and the proposed nonsuitability recommendation for the Link Flats ISA; no comments were provided by these agencies. The State of Utah did respond to the Intensive Inventory with generalized concurrence except in certain cases; Link Flats ISA was not mentioned (letter dated June 30, 1980, signed by Governor Matheson). It is problematic as to whether this can be considered applicable to Link Flats ISA. The Uintah Basin Association of Local Governments, located approximately 90 miles from Emery County in Roosevelt, Utah; did send a supporting comment during the Link Flats comment period. Emery County, the local government, is a member of a different association and did not respond.

The ISA does not contain significant resource values. The Natural Area designation was meant to protect an association of plants which was thought to be ungrazed. It is doubtful that the area was legally designated; it appeared on a list of Natural Areas without going through a formal study and designation process. It has since been determined that the plant association present has been continually grazed for decades by domestic cattle and wild horses. The area has no other resource values of significance. Correspondence with the State Historic Preservation Officer documenting "no effect" is on file in accordance with 36 CFR 800.

The Link Flats ISA is contiguous with two other BLM wilderness inventory units in Emery County: UT-060-007 and UT-060-025. UT-060-007 is contiguous with UT-050-233 in Wayne County, Richfield District. Units 007 and 233 were subject to an accelerated inventory as part of the Intermountain Power Project (IPP) study in 1978 and 1979, and the Muddy Creek WSA (31,360 acres) was identified. The inventory results on 007 and 233 have been appealed to the Interior Board of Land Appeals. UT-060-025 went through the regular inventory in 1979 and 1980 and the Devil's Canyon WSA (9,610 acres) was identified. Neither the Muddy Creek WSA nor the Devil's Canyon WSA is adjacent to the ISA. Both WSAs differ from the ISA in character. It has been determined that neither of the WSAs influence the Link Flats ISA.

The ISA is being managed under IMP restrictions while under wilderness review. IMP management will continue so long as the protest on the ISA and the related appeal on the adjacent roadless area are in effect. The ISA was segregated from mineral entry and surface use and occupancy in 1968. The nonsuitability recommendation, if implemented, would not change this status.

BACKGROUND INFORMATION

Previous Designation: Link Flats was identified as a potential Research Natural Area in 1964 to protect a reported ungrazed association of plants. Although discussed for several years as a potential Natural area, it apparently was never formally designated. However, Link Flats did appear on an official listing of Natural Areas. On October 29, 1968 it was segregated from entry or location under the general mining laws, and surface use and occupancy under the mineral leasing laws by official notice in the Federal Register (which referenced it as "Link Flats Natural Area"). The next year the District Manager informed the State Director that the area did in fact have a history of grazing use and recommended the Natural Area listing be discontinued because Link Flats did not qualify. This recommendation was never implemented.

It is not clear what the exact extent of the Natural Area was intended to be. The total acreage mentioned for the Natural Area in 1964 was 960 acres of vacant public lands and 350 acres of State lands, Sections 28 through 32, T23S, R9E, SLM, but the exact area was unspecified. The only legal description published for the Natural Area was in the 1968 segregation notice in the Federal Register:

T23S, R9E,
Sec. 29, S1/2 NE1/4, SE1/4, E1/2 SW1/4;
Sec. 30, SE1/4 NW1/4, E1/2 SW1/4;
Sec. 31, W1/2 NW1/4, S1/2 NE1/4, S1/2;
792 acres

There appears to be some error in this legal description. The acreage noted totals 912 acres, not 792 acres as stated. The W1/2 NW1/4, Section 31 is not part of the Flats, but rather contains a steep bluff; the E1/2 of the NW1/4 is totally on the Flats but is not included in the legal description. When comparing the legal description with the physiographic boundaries of the Flats, about 180 acres of the described area is not on the Flats and about 220 acres of the Flats on BLM lands is not included in the legal description. There is no mention of any area in Section 28 as there was in the 1964 notation of the area.

In sum, the status of Link Flats as a bona fide Natural Area is questionable. First, the Flats were never properly studied nor designated as a Natural Area; second, the original rationale for designation appears flawed; third, the legal description as published in the Federal Register appears to be in error; and fourth, there is a

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discrepancy between the actual area of Link Flats and the area described.

Significant Resource Data:

Rare Plants: Link Flats was recommended as a research area to protect and study a reported ungrazed association of plants. The plants themselves are not rare; it was the supposed ungrazed association that was noteworthy. It is not clear what the exact association was. A 1964 BLM memorandum identifies the association as Stipa comata and Atriplex canescens (needle and thread grass and four wing saltbush) with minor amounts of Orizopsis hymenoides and Eurotia lanata (Indian ricegrass and winterfat). Correspondence from the University of Utah dated 1966 refers to "a rare plant community" containing blue gramma, ricegrass, and needle and thread grass.

Link Flats was apparently not protected from grazing by wild or domestic stock before or after the "ungrazed" association was reported. It is questionable as to whether Link Flats represented an ungrazed situation in the mid-1960s. The District Manager stated in 1969 the area was not "ungrazed". While all the species mentioned above can still be found in the ISA, they do not represent an extensive community; none is a rare, threatened or endangered species. Either of the associations mentioned might be considered noteworthy if ungrazed. The associations do occur in other areas of the State.

Grazing: The ISA is part of the small Globe Link Allotment (7,250 acres) which has a history of use dating at least to the 1950s. In 1981, 900 AUMs for cattle and 4 AUMs for horses were allowed. The ISA has a small stock reservoir constructed prior to 1974.

Wildlife: Wildlife populations are not significant. There are mule deer in the vicinity. A wild horse herd of approximately 25 head frequents the general area and hoof prints and sign are very obvious within the ISA.

Geology: Surface stratigraphy of the ISA is predominantly the Kayenta sandstone formation (the flats) with overlying bluffs of Navajo sandstone. No geologic features of note are present within the ISA.

Energy and Critical Minerals: The San Rafael Swell has documented mineral potential but there are no proved reserves within the ISA. Energy minerals in the Swell include uranium, oil and gas; critical minerals include copper, vanadium,

selenium, gypsum, silver, and molybdenum.

Uranium ore was produced from the Lucky Strike Mine, one-quarter mile south of the ISA, starting in 1949. Ore deposits were mined from the Mossback member of the Moenkopi formation. The main deposit is now considered mined out although assessment work is kept current, indicating some speculative potential. Tunnels from the mine extend under the ISA and most surface impacts within the ISA are probably connected with exploration and development for the mine. File documents indicate drilling took place on Link Flats in 1971 and 1974 (not necessarily within the ISA), probably for mine development. Abandoned drill sites occur on State lands adjacent to the ISA; access is across the ISA. Oil and gas exploration in the San Rafael Swell began in the 1910s and continues to the present. In the early 1960s, dry holes were drilled about 2 miles north and south of the ISA. There are no producing wells within 10 miles of the ISA.

Copper was discovered at the Copper Globe Mine, 1 mile northeast of the ISA, prior to 1900 and was produced during World War I and World War II. Copper ore is found in the Kayenta formation. The mine is still worked for jewelry metal and rock specimens. The deposit is apparently localized and does not extend into the ISA. Uranium ores in the San Rafael Swell contain vanadium and selenium, but not in producible quantities. Gypsum deposits are located a few miles west of the ISA but the grade is not economically producible. Silver and molybdenum have also been found in the Swell.

Cultural: There are no known archaeological or historical sites on Link Flats, an inventory for minor sites has not been done. The State Historic Preservation Officer has concurred with BLM's findings of "no effect," in accordance with 36 CFR 800.

Description of Report Area: Link Flats lies in the San Rafael Swell, a breached anticline on the western edge of the Colorado Plateau physiographic province. Link Flats is one of a series of grassy flats falling between two major drainages, Devil's Canyon and Red's Canyon, which run to the southwest. Link Flats, Copper Globe Flats, and Justensen Flats are generally defined by pronounced sandstone bluffs to the northwest and are separated by pinyon-juniper desert woodlands.

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The San Rafael Swell lies in Emery County in Eastern Utah. The county encompasses 4,442 square miles. Its population in 1981 was about 11,150. Interstate Highway 70 (I-70) cuts across the center of the Swell. The ISA is about 3.5 miles south of I-70. The Justensen Flats interchange, directly north of the ISA, is about 9 miles from the ISA by road. The nearest towns are Moore and Emery (about 18 and 20 miles northwest of the ISA). The town of Green River is about 40 miles east of the Justensen Flats interchange on I-70.

No lands of other Federal agencies are near the ISA. The ISA is contiguous with two larger BLM wilderness inventory units, UT-060-007/UT-050-233 and UT-060-025. Although both of these contain a WSA, neither were considered to be part of the influence area of the ISA due to differences in character and patterns of human imprints. The two larger roadless areas are separated by the road which bisects the ISA.

The larger unit lies to the south of the ISA. UT-060-007 has 150,930 acres, and the adjacent UT-050-233 in Wayne County has 68,160 acres (219,090 acres total). These units were inventoried as part of the accelerated IPP study following guidance given in a Washington Office memorandum dated August 15, 1978. As a result, the Muddy Creek WSA (31,360 acres) was designated in September 1979. The inventory results on UT-060-007/UT-050-233 were subsequently appealed by the Utah Chapter, Sierra Club (IBLA Docket No. 80-308, January 10, 1980). The appeal has not yet been considered by IBLA.

To the north, the ISA is contiguous with UT-060-025 (24,050 acres). As a result of the regular inventory process, the Devil's Canyon WSA (9,610 acres) was designated in November 1980.

The Muddy Creek and Devil's Canyon WSAs both differ from the ISA in character. Both WSAs encompass canyon systems of varied and challenging terrain, whereas the ISA lies on rolling, open, grassy flats. The ISA is completely separated from the Devil's Canyon WSA by human imprints. Several major imprints and State lands lie between the ISA and the Muddy Creek WSA. The ISA does not share the wilderness characteristics of naturalness and outstanding opportunities for solitude or primitive and unconfined recreation identified within the two WSAs.

Summary of Public Participation:

Description of Process: Public participation in the ISA study process within the Moab District began with public meetings held in April 1978, where the three ISAs within the district were identified. Public meetings were held in the summer of 1979 to discuss the District wilderness inventory. Public comments were invited but none were received pertaining to Link Flats.

At the completion of the Link Flats ISA intensive inventory, a formal 30-day public comment period was held starting January 17, 1980. No public meetings or hearings were held specific to the Link Flats ISA. The final decision to recommend the ISA to the Secretary as non-suitable was announced in the Federal Register on May 5, 1980 and was subsequently protested by the Utah Chapter, Sierra Club. The protest was tied to the Sierra Club appeal on UT-060-007/UT-050-233. Decisions on both the current and the appeal are still pending.

Summary of Analysis of Comments: In response to the formal public comment period 11 letters were received.

	<u>General</u>	<u>Specific</u>	<u>Total</u>
Supporting BLM recommendation	5	0	5
Opposing BLM recommendation	2	3	5
No position	<u>1</u>	<u>0</u>	<u>1</u>
	8	3	11

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Of the supportive general comments, one was from an oil company, and one was from a (non-local) association of local governments. The remaining five general comments were from individuals. Two of the three specific comments were from organized conservation groups and the other was from an individual. No State or local government agencies responded, although the State did send a letter of general concurrence with the wilderness inventory at the close of the Intensive Inventory, June 30, 1980. It is problematic as to whether this implies support of the BLM decision on Link Flats ISA.

General comments not in concurrence with BLM findings expressed concern with ISA review procedures. One letter expressed dissatisfaction with wilderness in general. Specific comments from organized groups reference the contiguous appeal (one letter stated "protested"). The individual respondent disagreed with BLM methodology and objected to separation of Link Flats ISA from adjacent areas.

A copy of all letters received for the ISA and the two adjacent inventory units (UT-060-007 and UT-060-025) has been placed in the Permanent Documentation File for the Link Flats ISA in accordance with the Wilderness Act.

WILDERNESS INTENSIVE INVENTORY
SUMMARY SHEET

I. LOCATION:

Inventory Unit Number: NA
Unit Name: LINK FLATS ISA
Resource Area: San Rafael Resource Area, Moab District, Utah

II. SUMMARY:

A. Results of wilderness characteristics analysis:

- | | | |
|---|-----------|-------------|
| 1. Does the unit meet any of the size requirements? | _____ Yes | <u>X</u> No |
| 2. Does the unit appear to be natural? | _____ Yes | <u>X</u> No |
| 3. Does the unit offer outstanding opportunities for solitude or a primitive and unconfined type of recreation? | _____ Yes | <u>X</u> No |
| 4. Does the unit have supplemental values? | _____ Yes | <u>X</u> No |

B. Resulting map:

Attach a map showing inventory unit, roads, other human imprints, area with a possibility of returning to a natural state, and recommended boundary of any wilderness study area (WSA).

III. RECOMMENDATION:

Check one:

- Unit should be approved as a WSA.
 Unit does not qualify for wilderness study.
 A portion of the unit should be approved as a WSA for further study and reported to the President. The restrictions imposed by Section 603 of FLPMA will no longer apply to the remainder of the unit. (See map.)

IV. APPROVAL:

A. Resource Area Manager Samuel R. Lowrey Date 1/16/80
B. District Manager S. Gene Day Date 1-21-80
C. State Director _____ Date _____