Ozark National Scenic Riverways General Management Plan/Wilderness Study/Environmental Impact Statement Correspondence Received on the Preliminary Management Alternatives—Supplement

The following table was generated from the National Park Service's Planning, Environment, and Public Comment (PEPC) website. It includes two additional public correspondence received on the preliminary management alternatives through the close of the extended public comment period, ending September 11, 2009. The table is organized by correspondence identification number. For privacy purposes, the names and addresses of those who submitted individual correspondence are not included unless they included their names in the body of their comment.

The numbers in the correspondence entries refer to the five questions asked on the comment form that was included in Newsletter #3, as listed below:

- 1) Is one of the four preliminary alternatives (no action, A, B, or C) already close to your idea of the best way to manage Ozark National Scenic Riverways? If so, which one, and how might you modify it to make it close to your ideal?
- 2) Which parts of any of the preliminary alternatives do you feel strongly should be included in the future management of the national riverways?
- 3) Which parts of the preliminary alternatives do you feel strongly should not be included in the future management of the national riverways?
- 4) Ozark National Scenic Riverways is 134 miles long, and there may be some areas that are special to you or that you have concerns about. Which are those places and do the alternatives address them adequately?
- 5) Can you suggest any important strategies or approaches to the management of resources or visitor experiences along the national riverways that you think should be included? If so, what are they?

Please refer to the separate files of the Public Comment Summary Report, the Open House Flipchart Notes, and the Public Comment Distribution Map for more information.

ID No.	Correspondence	Receipt Date	Form Letter	# of Signatures (Form Letters Only)	Organization	State	Zip Code
4345	Page 1 of 18 Comments Offered to the National Park Service by Friends of Ozark Riverways *** The Current and Jacks Fork Rivers in Trouble In this paper we comment in some depth on Alternatives A, B, and C plus the "Do nothing" alternative. These alternatives were presented to the public by the National Park Service pursuant to its development of a new general management plan for Ozark National Scenic Riverways. Friends of Ozark Riverways offers nine specific policies dealing with, among other issues, resource degradation problems which have developed on the riverways in recent decades. Some of these policies also deal specifically with persistent user conflicts and the appropriate levels of user activity needed to preserve the high quality and natural character of the park for future generations. The "do nothing" alternative is not viable because it implies continued neglect of abusive practices on the riverways, and this contravenes the fundamental mission of the National Park Service. Alternative C establishes conditions that would cause incremental conversion of this predominantly natural area into an expanding developed area offering activities that depend heavily on visitor services, entertainment, and facilities reminiscent of urban environments. Ultimately, such development would become self-propagating and the natural or wild character that once prevailed in this part of the Ozarks would disappear. We reject Alternative C. Alternative B is essentially the same as Alternative C, except that the development starts out smaller, and subsequent growth probably would lag behind Alternative C by several years. We also reject Alternative B. Alternative A is the only alternative that is consistent with the purposes and vision of the riverways at the time it was conceived by the National Park Service and as it was established by Congress. This alternative readily accommodates the policies and practices that Friends of Ozark Riverways advocates. Our policy recommendations are intended to eliminate the abusive prac	07/08/2009	No		Friends of the Ozarks	MO	63130

Permanently close all unofficial and extraneous river access roads, and obliterate those road segments that cross park land. We recommend a schedule of incremental closings at the rate of eight per year. Currently, there may be more than 75 such unauthorized river access points. This policy would help restore and maintain important riparian habitat.

Ban the operation of ATVs and dirt bikes off of legally designated state and county roads within the boundaries of the park.

Ban the use of mobile campers on river banks except in official park campgrounds designed to accommodate such camping units. This policy, too, would help restore and maintain important native riparian habitat.

Control and moderate trail riding on ONSR land by implementing the following measures:

- a. Reconstruct and re-align horse trails at a sufficient distance from natural water courses (rivers, creeks, sink holes, and other bodies of water) to preclude the pollution of rivers and creeks from horse droppings. Exceptions would be permitted only at official equestrian river crossings.
- b. Reduce the total number of river crossings;
- c. Limit trail access to gravel bars; and
- d. Establish reasonable controls on the size and frequency of trail riding parties.

Control the frequency and number of non-motorized watercraft (canoes, rafts, tubes, etc.) on the rivers to alleviate crowding caused by large clusters of such watercraft and the absence of temporal spacing at the put-in points.

Place a year-round ban on the use of recreational power boats above Two Rivers, a ten horsepower limit (suitable for johnboating) between Two Rivers and Van Buren, and a 25 horsepower limit below Van Buren.

Place enforceable restrictions on the playing of radios or recorded music so that one person's desire for such entertainment in the park shall not diminish other visitors' enjoyment of the park.

By contrast with the previous eight issues, we have a welcome opportunity to preserve one place on Ozark National Scenic Riverways that has retained its truly wild character even as a hundred years of change has taken place in the surrounding countryside. This is the back country portion of the old Big Spring State Park, a 3,400 acre primitive area representative of the pristine hills and forests that once dominated this part of the Ozarks. It is a tract truly worthy of being preserved in its wild state. We urge the National Park Service to recommend this area for designation as a national wilderness area.

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Mission and Schedule for the Development of the New Management Plan The National Park Service is now midway through its six year schedule to develop a new general management plan for Ozark National Scenic Riverways (ONSR). This will become the second such plan since the park was established in 1964. We are now in the second public comment period, wherein the Park Service has presented three alternative futures for the park and has asked for public comments and questions at five public meetings held in the last week of June. In the materials circulated at the public meetings, the National Park Service stated the statutory purposes of Ozark National Scenic Riverways. Two of these purposes are (to) preserve and protect in an unimpaired condition the unique scenic and natural values, processes, and unspoiled settings derived from the clean, free-flowing Current and Jacks Fork rivers and the springs and caves and their karst origins; (and)

(to) provide for uses and enjoyment of the outdoor recreational opportunities consistent with the preservation of the natural riverways resources. (Bold highlight added)

The National Park Service has beautifully described the exceptional nature of this park: The national riverways contains 134 miles of clear, free-flowing, spring-fed rivers. These include the Jacks Fork and Current rivers, which are two of only three Outstanding National Resource Waters in Missouri.

The ... karst landscape supports an amazing variety of natural features, including a world-class spring system that is unparalleled in North America. The national riverways features the largest spring in the national park system, six first-magnitude springs and spring complexes, and more than 350 other springs. The cave system is equally impressive with more than 338 recorded caves – one of the highest densities of any national park system unit.

The ancient Ozark Highlands is an important center of biodiversity in North America, including more than 200 endemic species. The large variety of species found within Ozark National Scenic Riverways is due to the rich array of aquatic, terrestrial, and subterranean habitats concentrated within its river corridors.

The Park Service also briefly summarized the stewardship problems we referred to above: Ongoing natural resource management issues include water quality degradation from recreational use (e.g., human waste from floaters, soil erosion from off-road vehicles, horse manure, and exhaust from motorboats); habitat fragmentation and trail proliferation from illegal off-road vehicles; the spread of nonnative invasive plant and animal species; visitor-related disturbances to wildlife; and land uses and activities that occur outside the boundary that impact national riverways resources, including water quality.

Unfortunately, this is pretty much everything the Park Service has told the public about resource abuses. No where did the Park Service quantify them or show on a map how extensive they have become. To its credit the Park Service did publish photographs depicting crowding and roughhousing on the rivers, but in our view, the Park Service has generally failed to provide sufficient information on Page 4 of 18

the abusive practices for the public to develop an appreciation for the need for more and better regulation of troublesome activities. Estimating the Impact Severity Associated With Various User Activities and Land Use Practices We made a list of all the user activities we were aware of that regularly occur on Ozark National Scenic Riverways. Next, we estimated the severity of their impacts on the natural resources and amenities of the park plus any adverse impact on the visitor's enjoyment of the park. We considered three levels of impact:

- 1 Activity that produces no lasting adverse impact;
- 2 Activity that may produce lasting adverse impact depending on the frequency of occurrence and user behavior;
- 3 Activity that generally produces lasting adverse impact.

We also performed a similar exercise looking at the impacts of land use practices inside the ONSR boundaries. Then we focused on developing policies to manage the problems that we deemed to be especially important. This analysis appears in the appendix at the end of this document. What is the lasting impact of this activity?

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Discussion of Management Policies Proposed by Friends of Ozark Riverways I Management policies for dealing with the most serious level of impact, i.e., those land use practices and user activities that cannot be mitigated and are difficult to regulate:

- 1. Excessive numbers of bank openings [p. 18, row 50]. These openings create fragmentation of habitat used by riparian birds, mammals, insects, and unique vegetative communities. This loss of natural bank vegetation also degrades the scenic quality of the river and increases the vulnerability of river banks to erosion, particularly during floods. Finally, they create opportunities for illegal river access by land vehicles, especially ATV's.
- 2. Excessive numbers of river access points [p.18, rows 54 & 55]. The National Park Service originally envisioned one river access point approximately every seven or eight miles. This translates into 18-20 access points to cover the total 134 mile length of the riverways. The Current and Jacks Fork are swift running rivers. A 7-8 mile trip can easily be paddled in a few hours unless the river is unusually low. The Park Service could also achieve an average 7-8 mile spacing by creating a few shorter runs balanced by a few longer runs. If the average spacing were reduced to five miles, then 28 access points would be required. Today there are 25 official river access points.

By 1991, the combined number of official (25) and illegal access points on the riverways had exceeded 100 (averaging one access point every 1.3 miles). Illegal river access road and ramp at Twin Rocks

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At this density of river access, a floater would, on average, pass two or three access points every hour. Each access point interrupts the sense of remoteness and enjoyment of the natural setting. By way of contrast, the 135 mile long Buffalo National River has 22 graded access roads and perhaps ten additional two-track roads. There are no other roads providing access to the Buffalo River. All of the illegal access points on ONSR are extraneous, and Friends of Ozark Riverways urges that they be closed and the natural vegetation restored. Access reduction at an incremental rate of eight closures per year would complete the work in the tenth year, and it would allow current users plenty of time to adjust to the changes in their river access routes.

3. Operation of ATVs and dirt bikes off-road [p. 17, rows 34 & 35]. These sport vehicles cause erosion wherever they go off-road. They are highly destructive to both aquatic and terrestrial native wildlife habitats. Tearing through pristine places for the fun of making noise or leaving their marks or disrupting the peaceful environment of one of Missouri's most beautiful natural places may be strong motivators for this particular user group. Many, of course, are good people who are simply out joy riding, but they seem oblivious to the destruction they leave behind as well as the rude and unwelcome visits they pay on campers, picnickers, and visitors, many of whom came to the riverways especially to find peaceful solitude in a predominantly natural setting. No matter what actually motivates ATV and dirt bike riders, there is no legitimate place for their vehicles (other than for personal transportion on regular county and state roads) in a park that is managed for its natural, scenic, and peaceful character. Page 7 of 18

Traces of ATV Use at Twin Rocks on the Current River

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4. Camping in mobile campers on or near the river bank [p. 17, row 32]. Two important conservation goals on the riverways are the maintenance of vegetative closure on the banks and restoration of flood plain forests. Both provide vital habitat for native riparian communities of birds, mammals, insects, and amphibians; and the cover itself is an important natural community. The native biodiversity on the riverways depends largely on the integrity of these natural riparian communities. This is one reason why the number of river access points must be reduced and why the park's campgrounds must be restricted to less fragile areas.

Placing mobile campers on an open field is an anathema to the restoration and protection of the natural landscape. Furthermore, these mobile campers could never get into these locations without using illegal access. The creation of a notch in the bank and establishment of a mud ramp is nothing less than vandalism of the park's natural features, and the presence of mobile campers obliterates any semblance of a natural riparian environment along this stretch of river.

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- Il Management policies for dealing with land use practices and user activities which can be moderated to achieve substantially lower levels of adverse impact:
- 1. Trail riding [p. 17, rows 36 & 37]. Although trail riding is a beloved, traditional, and widely enjoyed form of outdoor recreation, it is practiced at unusual extremes on Ozark National Scenic Riverways. Trail riding parties can range in size from fewer than five horses to as many as a thousand! All of the official trails are located within a five mile radius of Two Rivers campground. They extend up the Current River as far as Jerktail Landing and five river miles up the Jacks Fork. The Jacks Fork horse trails then continue for another six miles along a stretch of river that is outside the boundaries of Ozark National Scenic Riverways. This stretch runs through the town of Eminence and beyond. In many places these trails follow the banks of the rivers and cross the rivers at eleven different fords in an area where there are only four official river access points. The main impacts of trail riding are elevated levels of fecal coliform pollution of the rivers, compaction and destruction of river bank soils and

vegetation, disturbance of aquatic habitats, and conflicts between user groups. Following the discovery in 1998 of significant fecal coliform pollution on a five river-mile reach of the Jacks Fork, "the U.S. Geological Survey, in cooperation with the National Park Service, (began) a study to better understand the extent and sources of microbial contamination within the Jacks Fork from Alley Spring to the mouth," a distance of approximately 15 river miles. This includes the entire stretch of river, noted above, that is outside the boundary of ONSR. Here is an excerpt taken from the 2006 findings of this study: Results indicate that recreational users (including boaters and swimmers) are not the primary source of fecal coliform bacteria in the Jacks Fork; rather, the presence of fecal coliform bacteria is associated with other animals, of which horses are the primary source. Increases in fecal coliform bacteria densities in the Jacks Fork are associated with cross-country horseback trail-riding events. (Bold highlighting was added.) IN SOME POLLUTED AREAS, THE NATIONAL PARK SERVICE HAS FOUND IT NECESSARY TO POST SIGNS WARNING VISITORS NOT TO SWIM IN THESE WATERS. In addition, nearly every gravel bar in the vicinity of horse trails, has been disturbed by divots created by horse hoofs and abundant piles of horse droppings. These effects create conflicts between the visitors who go to the gravel bars to picnic, relax, and set up camp, and the horse traffic that despoils these areas. Finally, as with ATVs and dirt bikes in rivers, horses break down the gravel structures on the river bottoms. These structures are crucial to the breeding, sheltering, and feeding of many species of fish, amphibians, and invertebrates.

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Bank clearing on a horse trail that follows the bank of the Current River inside the boundaries of Ozark National Scenic Riverways Trail riders crossing the Jacks Fork. Photo taken from the web site of Cross Country Trail Ride, LLC
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Friends of Ozark Riverways believes that these problems could be alleviated by moving horse trails a sufficient distance away from natural water courses (rivers, creeks, and sink holes), with exception only at official equestrian river crossings; by limiting trail access to gravel bars; and by reasonably controlling the size of trail riding parties. We urge the National Park Service to study the feasibility of implementing these methods for the preservation of the river resource and for the greater enjoyment of both equestrians and those who stay primariy on the rivers and gravel bars. Horse Trail Map Published on the Web by Cross Country Trail Ride, LLC Page 12 of 18

III Management policies for dealing with crowding and user activities which mainly detract from other users' enjoyment of the riverways:

- 1. Floating in congested areas [p. 16, row 6]. The rivers within Ozark National Scenic Riverways generally flow through deep, entrenched meanders which frequently turn sharply as they approach the numerous sheer, rock faced bluffs. One minute the floater may find him or herself in the midst of a large cluster of other floaters, and a few minutes later round a bend and see no signs of other people for 10 or 15 minutes. It is like a game of hide-and-seek; everyone gets a turn at experiencing the perception of peaceful solitude and remoteness even as the total population of floaters on that day might be large. The key to this wonderful experience is the maintenance of adequate spacing between clusters. Achieving these quality experiences for the river visitor is a management challenge. It may be possible to control the perception of crowding by regulating the size of float groups and the temporal spacing of float parties at put-in points. The preponderance of floaters on typical summer days use rental watercraft, so effective controls might be feasible by regulating the activity of commercial canoe liveries at the rivers. We believe the crowding problem can be solved, perhaps with the help of skilled traffic control engineers. In any case we urge the National Park Service to take more aggressive control of float traffic for the greater enjoyment of all floaters.
- 2. Power boating [p. 16, row 18]. Few things are as disruptive to floaters' peace and enjoyment of the river as the roar of a speeding power boat that is approaching, and the waving of power boat passengers as if everyone else on the river is enjoying their fun. Most other river users are not enjoying their fun; they actually are quite perturbed by it. Accordingly, we recommend a year-round ban on recreational power boating above Two Rivers, a ten horsepower limit (suitable for johnboating) between Two Rivers and Van Buren, and a 25 horsepower limit below Van Buren. By comparison, the power limit on the 135 mile Buffalo National River in northern Arkansas is ten horsepower everywhere except on sections of the river that run through wilderness areas. On these sections power boats are not permitted.

Power boating, sailing, and big boat fishing are the typical water activities that one finds on recreational lakes. Less than 50 miles east of Van Buren is Lake Wappapello, an area

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containing 44,000 acres of land and water, where opportunities for unrestricted power boating are abundant.

3. Playing of radios or other electronic sound equipment [p. 16, row 17]. If any kind of noise is more annoying than power boats, it may very well be the programmed sounds of talking radios, raucous radio ads, and recorded music. These man-made sounds can easily drown out the sounds of nature – sounds that are integral to the unique ambiance created by these riverways. For many visitors, going to the river means getting away from the mundane sounds found everywhere in cities, cars, and all manner of man-made public spaces.

Many visitors come eagerly anticipating the bright sounds of bubbly riffles; the exciting sounds of rapids; the splash of turtles jumping into the water, the splash of fish jumping out of the water, maybe even the splash of a startled beaver or otter, or, perhaps, the songs and calls of birds, frogs, and insects. One certainly cannot find this repertoire of natural sounds in town. Because sound reflects so well from the surface of water, one can often hear the conversations of people on rivers or lakes who are hundreds of feet away. Thus, it is almost impossible to keep radio and musical sounds private. We urge the National Park Service to place enforceable restrictions on the use of radios or recorded music in the park so that one person's desire to have radio or musical entertainment shall not impinge on other visitors' rights to enjoy natural sounds on the river. IV Big Spring Wilderness: One place on Ozark National Scenic Riverways that has retained its truly wild character is the back country portion of the original Big Spring State Park, a 3,400 acre primitive area that is representative of the pristine hills and forests that once dominated this part of the

	Ozarks. When Big Spring was established as a state park in the 1920's, this wonderful stretch of rugged hills and forest was set apart, de facto, from the more developed parts of the park. Today we have the opportunity to permanently prect this special remnant of the original Ozark wilderness. We urge the National Park Service to recommend this area for designation as a national wilderness area. This should be an easy and welcome decision for the National Park Service. Page 14 of 18 Conclusions The "do nothing" alternative is not viable because it implies continued neglect of abusive practices on the riverways. Such neglect violates the National Park Service's primary mission, which is to protect and preserve the natural resources including the park's native biodiversity, its extraordinary geological and hydrological features, its water quality, its scenic beauty, its generally wild character, and the opportunities the park affords visitors to find solitude in nature. This part of the mission statement is not merely a permission that allows the National Park Service to protect its resources; it is a positive obligation incumbent upon the National Park Service. We question how such extensive abuses were able to take hold in this park in the first place under National Park supervision. If, over the years, the Park Service has intentionally agreed to relax its stewardship policies and allow exceptions and accept solutions to user group conflicts that resulted in further degradation of the park resources, then IT IS TIME FOR SUCH LAPSES IN RESPONSIBLE MANAGEMENT TO END. Alternatives B & C would create conditions that would produce incremental conversion of this predominantly natural area into a vast playground for activities that depend heavily on visitor services, entertainment, and facilities reminiscent of urban environments. Ultimately, such development would become self-propagating, and the natural or wild character that once prevailed him, and the produce incremental conversion of the wild character that on				
4346	September 10, 2009 Reed Detring, Superintendent Ozark National Scenic Riverways P.O. Box 490 Van Buren, MO 63965 Dear Mr. Oetring, Over the years, my husband and I have floated and camped many times on the Current and Jacks Fork Rivers. On our last Current River trip, we paddled from Round Spring to Two Rivers, a stretch that was always one of our favorites. This time, however, we noticed ATV tracks on gravel bars wherever we stopped for a break or for lunch or to swim or to camp overnight. We didn't know where the ATV's came from, but they clearly left their marks. Those tracks also recalled for us stories told to us by other floaters, strangers to us, who had been victimized by being forced off their camp sites in the evening under threat of harm by hoodlums emerging from the woods on ATVs. like us, the victims did not know where the ATV's came from. One minute, it was just they and the peaceful setting of the river. The next minute, they were surrounded by hostile men on machines. How frightened they must have been and how angry to have had the serenity they sought on these national parklands abruptly interrupted by unwelcome visitors. By the time we reached Twin Rocks we were seeing evidence of heavy horse traffic on every gravel bar where we stopped. Thus, we had to camp next to ATV tracks crisscrossed with horse hoof tracks and surrounded by piles of horse manure and the pesky flies that came with it. This was something we had never experienced in all of the previous years when we floated on the	09/11/2009	No	MO	63130

Current River.			
We recall that this park was established by Congress to serve the people of the United States by			
preserving a very special place, an extraordinary landscape ideally suited to traditional riverbased			
activities. So how did it happen that this park ended up being used for all sorts of			
activities that had no inherent connection to rivers? How did it happen that the exquisite banks			
of the Current River had been opened and denuded in many places to make way for horse trails			
that more properly belonged on upland areas? How did it happen that roads from nowhere			
emerged from the woods to bring motor vehicles down to the river and to the gravel bars? We			
discovered that this river, which had been preserved for its special qualities within the family of			
great American landscapes, was being progressively stripped of those qualities right under the			
eyes of the National Park Service. How did the priorities of the National Park Service get so			
twisted on Ozark National Scenic Riverways?			
Perhaps we could have explained these losses if the area had not been protected under some			
type of conservation program and had stood in the path of urban development. But these were			
not the defining conditions on the Current and Jacks Fork Rivers. To the contrary, this relatively			
remote area had already been established as a unit of the National Park System. We should			
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have been able to expect that this area would be in the best of hands, devoted to the kinds of			
human activities that were uniquely associated with its riverways, its history, its wildlife, its			
awesome springs and complex Karst geology, and its extraordinary natural scenic beauty.			
My husband remembers this riverway as it was before it became corrupted by inappropriate			
uses. He will always have those memories, but what about the people who come after us? Will			
future generations of Americans be able to experience and enjoy the same high resource values			
and miles of unbroken natural bank cover that my husband experienced decades ago? We			
thought the reason the National Park Service was put in charge was to insure lasting			
opportunities for future generations to experience and enjoy the same exceptional natural			
qualities that we have enjoyed. Today we find that these qualities have been significantly			
degraded. It is time now to restore them.			
We believe that under the Congressional mandate governing the National Park Service, no			
other user interests can override the Service's obligation to protect and preserve in perpetuity			
the special natural resource values found on these riverways. Accordingly we urge you, the			
park superintendent, to begin immediately to develop a comprehensive plan to restore and			
protect in perpetuity the precious resource values that have been lost to date on Ozark			
National Scenic Riverways. It is your responsibility and, indeed, your obligation to insure that			
future generations will not be denied the resource values for which this park was established.			
Thank you for this opportunity to comment on the future of Ozark National Scenic Riverways.			

Sincerely,
Darlene Davies-Sugerman & Jerry M. Sugerman
7426 Melrose Avenue
St. louis, MO 63130
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