

National Park Service  
U.S. Department of the Interior

Ozark National Scenic Riverways  
Roads and Trails Management Plan – FONSI

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**FINDING OF NO SIGNIFICANT IMPACT**  
**Roads and Trails Management Plan**  
**Ozark National Scenic Riverways**

March 2022

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## BACKGROUND

Ozark National Scenic Riverways (the park) was established as a unit of the national park system in 1964 to protect over 134 miles of the Current and Jacks Fork Rivers in the Ozark Highlands of southeastern Missouri. As a linear park encompassing approximately 80,785 acres along these rivers, a vast network of roads and trails serve as the primary conduit for visitors accessing the park.

The National Park Service (NPS) has completed a comprehensive planning effort in Ozark National Scenic Riverways (the park) and has prepared an environmental assessment (EA) to analyze potential impacts. The Roads and Trails Management Plan (RTMP, Roads and Trails Plan) and EA are in compliance with the National Environmental Policy Act of 1969 (NEPA), as amended.

This finding of no significant impact and its associated EA constitutes the record of the environmental impact analysis and decision-making process. The National Park Service will implement the selected alternative to improve the system of park roads and trails to ensure that it provides access to a variety of locations and experiences while also protecting the park's fundamental resources and values. The proposed action was selected after careful analysis of resource and visitor impacts, consultation with eight affiliated tribes, the US Fish and Wildlife Service (USFWS), the Missouri State Historic Preservation Office (Missouri SHPO), and review of public comments.

This document records (1) a finding of no significant impact as required by NEPA; (2) a finding of no effect to federally listed species or their habitat as required by the Endangered Species Act, section 7; and (3) a finding of no potential to affect historic properties under the National Historic Preservation Act, Section 106; all described by the Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-Making* and the National Park Service NEPA Handbook (NPS 2015). This finding of no significant impact is available on the NPS Planning, Environmental and Public Comment (PEPC) website (<https://parkplanning.nps.gov/document.cfm?parkID=158&projectID=56591&documentID=113284>).

## **PURPOSE AND NEED FOR ACTION**

The purpose of the Roads and Trails Management Plan is to improve the system of park roads and trails to ensure that it provides access to a variety of locations and experiences while also protecting the park's fundamental resources and values. A plan is needed to ensure that designated<sup>1</sup> roads, trails, and associated public recreation areas are clearly documented going forward and that undesignated<sup>2</sup> roads and trails are properly restored<sup>3</sup> to protect the park's natural and cultural resources and improve visitor safety. The use of undesignated, visitor-created roads and trails have led to resource concerns and safety issues for visitors, including longer response times for law enforcement personnel and more complex search and rescue operations. Restoring redundant and undesignated roads would improve visitor experience, visitor safety, resource conditions; provide cost savings; and allow more investment in designated visitor facilities throughout the park.

The plan will serve as the primary implementation-level planning effort for future road and trail development and management in the park.

## **PLANNING GOALS AND OBJECTIVES**

In addition to outlining the purpose and need for the RTMP/EA, the National Park Service identified goals and objectives to help guide the development of alternatives for this plan. The goals and objectives for the RTMP/EA were developed with consideration of the park's purpose and significance; NPS policies and mission; and input from park staff, partners, stakeholders, and the public. Goals and objectives also assisted the planning team in the development and evaluation of alternatives and selection of an alternative.

### **Goals**

Overarching goals of the RTMP/EA are to establish (1) a system of designated roads, trails, public recreation areas, and staging areas; (2) appropriate types and levels of visitor use associated with roads and trails; (3) maintenance standards for designated roads and trails; and (4) guidance for restoring roads and trails identified for closure or rerouting.

### **Cultural Resource Objectives**

Roads, trails, river access points, and river crossings would be located to avoid and/or protect cultural resources that are important and integral to understanding the human history of the

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<sup>1</sup> Designated roads include roads within the park that have been authorized by the National Park Service through a formal planning process and which are designed, constructed, and maintained by the National Park Service in accordance with NPS road standards.

<sup>2</sup> Unauthorized, visitor-created trails that are not part of the official road and trail system.

<sup>3</sup> Additional information on restoration is provided in chapter 2 and in Appendix G: Mitigation Measures and Best Management Practices of the RTMP/EA.

area, including sensitive archeological and ethnographic resources, cultural landscapes, precontact or historic structures, and ethnographic resources. In addition to these NPS-recognized resources, American Indian sites of cultural or religious significance would be avoided, both those known and others that may be identified as a result of ongoing consultation.

### **Natural Resource Objectives**

Roads, trails, river access points, and river crossings would be designed and located to minimize adverse impacts to water quality and important terrestrial and aquatic communities. Plan objectives would make use of existing disturbed areas for proposed roads and trails, restore heavily impacted and environmentally sensitive areas, and direct trail use to other designated trails or new trails having more suitable soils. Adjustments to the timing and distribution of trail use would help to further protect sensitive park resources.

### **Visitor Use and Experience Objectives**

Roads, trails, river access points, and river crossings would provide clearly defined access to a variety of opportunities and locations in the park with minimal duplication. Appropriate access would facilitate education and interaction with natural resources as well as cultural landscapes and historic sites. Designating locations for parking and camping on gravel bars would enhance the scenic and natural qualities of the park experience. Trails would be designed and managed to minimize conflicts among user groups and to enhance visitor safety. Where possible, the trail system might connect to trails on adjacent lands, creating an expanded network for the enjoyment of visitors.<sup>4</sup>

### **Park Operations Objectives**

Roads, trails, river access points, and river crossings would be designed and located to maximize the efficiency of maintenance, interpretation, resource management, and law enforcement efforts while minimizing financial costs. Park management will strive to maintain flexibility to manage and protect natural and cultural resources as needed.

### **Community Objectives**

The park's network of roads, trails, and recreation facilities would reflect the importance of the Current and Jacks Fork Rivers to communities and the surrounding region, both in terms of economy and lifeways.

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<sup>4</sup> Consistent with the US Department of the Interior Strategic Plan (2018–2022).

## **ALTERNATIVES CONSIDERED**

Three alternatives were analyzed: a no action alternative (alternative A) and two action alternatives (alternatives B and C). These alternatives are described below.

### **Alternative A (No-Action, Current Management)**

Under alternative A, park officials would focus on continuation of the management direction established in the 2014 General Management Plan. The existing system of 230.5 miles of designated public use roads, trails, and river crossings would continue to be provided, along with opportunities for traditional recreation activities such as hiking, horseback riding, and hunting.

Undesignated or visitor-created roads and trails, as well as undesignated recreational areas, would be removed and restored to natural conditions. No new roads, trails, or associated facilities would be established. Horseback riding in the park would be limited to currently designated equestrian trails, as well as state and county unpaved roads. Biking would continue to be permitted on park roads, including electric bikes (E-bikes), per Secretary of the Interior's Executive Order 3376. Use of all-terrain vehicles (ATVs) and utility task vehicles (UTVs) would continue to be limited to county roads. This alternative would allow the least number of trails in the park.

The existing 96 designated recreation areas (appendix E of the EA) would continue to be provided. River access would be allowed only at designated access points. The park would continue to evaluate these areas on a case-by-case basis for closure or designation. Designated campsites or camping areas may be established on some gravel bars that are accessed by licensed vehicles. Visitors using motorized and nonmotorized watercraft could continue to camp on gravel bars if the campsite was 0.5 miles from any designated campsite and more than 50 feet from a designated river access point. (Additional information on gravel bar access can be found in the 2014 General Management Plan).

Per the 2019 Ozark National Scenic Riverways Accessibility Self-Evaluation and Transition Plan, the park would implement priority improvements that meet Architectural Barrier Act Accessibility Standards (ABAAS), including accessible routes near key park sites, such as the Alley Spring Mill and Schoolhouse, Big Spring, Round Spring, and Two Rivers campground and amphitheater. The National Park Service would continue to consider future opportunities to expand the network of accessible trails in the park, where appropriate.

### **ALTERNATIVE B (NPS SELECTED ALTERNATIVE)**

#### **Road and Trail Mileage**

Under alternative B, a total of 216.5 miles of public use roads would be provided. All undesignated roads would be removed and restored to natural conditions, including roads identified for closure in the 1991 Roads and Trails Study that have not been closed to date. The National Park Service would close about 14.0 miles of currently designated NPS-administered roads—2.5 miles of which are in primitive zones. A large portion of these NPS-administered

roads are in the primitive zone near Pulltite Campground. The Old Tram Road, located in the Lower Current River area, would provide increased access for bicyclists and hikers. Approximately 14 miles of NPS public use roads would be closed due to the presence of other routes being available in and to the same locations, in unstable or unpassable conditions, or due to resource concerns.

In addition to the existing designated trail system, the park would add 49.5 miles of new trails, 7.5 miles of which would be outside the park's jurisdictional boundary, providing a total of 150.5 miles of trails. The park has partnered with landowners to identify additional conceptual trail alignments/corridors both inside and outside the NPS boundary for future, authorized trails. Conceptual trail alignments are based on verbal agreements with those private landowners. Formal agreements would be secured in the future, prior to any trail development.<sup>5</sup> New trail alignments would be largely concentrated in the Upper Current River District, and many of these trails would incorporate some portions of existing undesignated trail alignments, although new alignments would be constructed. Designated trails would be aligned to minimize potential impacts on sensitive cultural and natural resources. Most of the undesignated, visitor-created trails would be removed and restored to natural conditions.

### **Introduction of Biking**

As in alternative A, biking would continue to be allowed on designated park roads. New bike trails would be formally designated along 5.8 miles of the Old Tram Road and 4 miles of existing trails in the vicinity of the Partney Ridge and Partney House Trails.<sup>6</sup> In the future, if a property owner is receptive, the park would consider additional loop and connector trails extending both inside and outside the park along the 5.8 miles of new trail that would be designated on Old Tram Road. E-bikes would be allowed in all locations traditional bikes are allowed. Alignments for these possible new trails along Old Tram Road would be identified as part of future planning.

### **Permit for Equestrian Riding**

The National Park Service would seek to establish a permitting system for equestrian users that would require individual riders to secure a permit (possibly online via the recreation.gov system, at park headquarters, or at other visitor contact points) before riding on park trails. When established, the permitting system would provide information and education to riders, help track the volume of use on equestrian trails, and enable the park to manage the levels of use on equestrian trails. Equestrian rider numbers and timing of use would be managed to spread use more evenly throughout the day on different trails to reduce congestion. Any fees (e.g., daily, multiday, seasonal, annual) tied to the future permit system would be based on factors such as trail maintenance and cost recovery needs associated with administering the permit system, as

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<sup>5</sup> Proposed trail routes highlighted as part of alternatives B and C in appendix D reflect trail corridors that have been identified based on preliminary field verification. Exact placement on the landscape will be determined when trail planning and site design is initiated.

<sup>6</sup> Bicycle use on trails requires a separate rule-making process, which would follow this planning process.

well as an analysis of comparable costs.<sup>7</sup> One new hiking trailhead (in the Middle Current River area) and one new horse staging area would be constructed with additional parking to accommodate equestrians in the Upper Current River area, in the vicinity of Cedar Grove / Dee Murray. The new horse staging area and the trailhead would be sited an appropriate distance from the river to the extent feasible to protect sensitive resources such as riparian zones. Site-specific NEPA and Section 106 compliance would be completed for these sites at a later date.

### **All-Terrain Vehicle and Utility Task Vehicle Permits**

The National Park Service would seek to authorize ATVs and UTVs on designated NPS roads through a permitting system (possibly administered online or by visiting park headquarters). Any fee (e.g., daily, multiday, seasonal, annual) tied to the future permit system would be based on factors such as road maintenance and cost recovery needs associated with administering the permit system, as well as an analysis of comparable costs.<sup>8</sup>

### **Horse Trail River Crossings**

Undesignated river crossings would be closed and restored to reduce potential impacts on water quality and sensitive species. The seven existing designated horse trail river crossings would continue to be provided. Seven additional trail crossings would be designated on the Upper Current River to direct use away from dozens of informal, undesignated crossings. Equestrians would continue to be required to cross the river only at the 14 total designated crossing points.

### **Designated Recreation Areas Along the River**

The park would designate 94 recreation areas along the 134-mile river corridor (appendix E of the RTMP/EA). Three recreation areas would be removed—the Summer’s Bluff Primitive Area and Lower Flying W Primitive Area in the Upper Current and the Panther Spring Primitive Area in the Lower Current. The primary reason for removing these areas would be removal of the NPS-administered roads that provide access. River access would be allowed only at designated access points. Potential future updates to a river use management plan may necessitate that the number of recreation areas along the river be changed.

### **New Horse Staging Areas, Parking Areas, and Trailheads**

Additional horse staging areas, parking areas, and trailheads proposed include a new hiking trailhead (in the Middle Current River area) as well as one new horse staging area and parking to accommodate equestrians in the Upper Current River area, in the vicinity of Cedar Grove / Dee

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<sup>7</sup> As of 2020, preliminary research did not point to any similar types of fees tied to equestrian use in the local surrounding region. Prior to implementation of an equestrian permit system, an analysis of comparable costs would be conducted and opportunities for additional public comment would be provided.

<sup>8</sup> As of 2020, comparable costs for annual ATV/UTV permits in neighboring counties was \$15. Comparable costs for daily and annual ATV/UTV permits ranged from \$7/day; two-day permits were \$14; three-day permits were \$21; and annual permits were \$45 (USFS 2018).

Murray. New horse staging and parking areas and the trailhead would be placed at an appropriate distance from the river to the extent feasible to protect sensitive resources such as riparian zones. Site-specific NEPA and Section 106 compliance would be completed for these sites at a later date.

### **Vehicular Access to Gravel Bars**

As in alternative A, visitors using motorized and nonmotorized watercraft could continue to camp on gravel bars a minimum of 0.5 miles from any designated campsite and more than 50 feet from a designated recreation area.<sup>9</sup> A designated camping area would be established on the Log Yard gravel bar. These sites would be managed for individuals accessing their campsites by licensed vehicle. Park staff would retain the flexibility to manage access to or close the Log Yard gravel bar to vehicle access to improve safety, reduce crowding, enhance visitor experience, and protect park resources. Gravel bar camping at Two Rivers would be allowed in designated campsites. Walk-in camping opportunities would be provided at some gravel bars formerly accessible by vehicles, and in these instances, designated parking would be provided in proximity to gravel bars where vehicular traffic is prohibited.

### **Accessible Routes and Trails**

Overall, the routes and trails would be the same as alternative A, with the addition of a quarter mile of accessible trail from the parking lot to Blue Spring. Trails identified in appendix K of the RTMP/EA as having desired trail classes of “4” or “5,” as well as any new trails that meet these classifications, would be considered for universal access per the ABAAS.

## **ALTERNATIVE C**

### **Road and Trail Mileage**

Approximately 13.0 miles of NPS public use roads would be closed due to the presence of other routes being available to the same location, unstable or unpassable conditions, or resource concerns. Also, similar to alternative B, opportunities for traditional recreation activities, such as hiking and horseback riding, would be expanded. The key differences between the two action alternatives are mostly related to trail mileage, with alternative C having 9 more miles of trails and two additional river crossings. Alternative C also has one more recreation area for public use.

In addition to the existing designated trail system, the park would designate 58.5 miles of new trails, 7.5 miles of which would be outside the park jurisdictional boundary. As described in alternative B, the park has partnered with landowners to identify additional conceptual trail alignments/corridors for future, authorized trails. Formal agreements would be sought in the future before trails are developed. New trail alignments would be largely concentrated in the

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<sup>9</sup> Larger gravel bars, such as those at Log Yard and Two Rivers, are generally more stable in contrast to smaller gravel bars, which are commonly affected by elevated river flows and flood events.

Upper Current River District; many of these trails would incorporate some portions of existing undesignated trail alignments, although new alignments would be constructed. Designated trails would be aligned to minimize potential impacts on sensitive cultural and natural resources. Most undesignated trails would be removed and restored to natural conditions. Additional trails included in alternative C comprise a quarter mile of accessible trail from the parking lot to Blue Spring, which would be constructed; new hiking opportunities near Montauk State Park in the Upper Current River area; and the addition of a loop trail that provides a longer and different experience than alternative B. Alternative C would also include 5.5 additional trail miles for equestrian riders.

In the Middle Current River area, new hiking opportunities would provide increased access, with new connections between Roberts Field and the Thorny Creek and the Russell Mountain area with the Ozark Trail. These additional connections would benefit long-distance hiking opportunities and increase overall trail connectivity.

### **Introduction of Biking**

Biking would continue to be allowed on designated park roads, and bike use would be allowed on approximately 12.0 miles of trails being formally designated for this use, including a portion of the Ozark Trail near Powder Mill. New biking opportunities would be added in alternative C along the Ozark Trail that are not included in alternatives A or B. The park would designate biking along a portion of the Nature Trail at Pulltite, which is in the Upper Current District, along with 1.5 miles of the Campground Bluff Trail in the Lower District. E-bikes would be allowed in all locations where traditional bikes are allowed.

### **Permits for Equestrian Riding**

As in alternative B, the National Park Service would seek to establish a permitting system for equestrian users. The permitting system would provide information and education to riders, help track the volume of use on equestrian trails, and enable the park to manage the levels of use on equestrian trails. Equestrian rider numbers and timing would be managed to spread use more evenly throughout the day on different trails to reduce congestion.

### **All-Terrain Vehicle and Utility Task Vehicle Permits**

As in alternative B, the National Park Service would seek to authorize ATVs and UTVs on designated park roads through a permitting system.

### **Horse Trail River Crossings**

Similar to alternative B, undesignated river crossings would be closed and restored to reduce potential impacts on water quality and sensitive species. The seven existing designated horse trail river crossings would continue to be provided. Nine additional trail crossings would be designated on the Upper Current River to direct use away from dozens of informal, unauthorized crossings. Horses would continue to be required to cross the river at 16 total designated crossing points.

## **Designated Recreation Areas Along the River**

The park would designate 95 recreation areas along the 134-mile river corridor (appendix E). Summer's Bluff Primitive Area would be removed. River access would be allowed only at designated river access points. Potential future updates to a river use management plan may necessitate that the number of recreation areas along the river be changed.

## **Horse Staging Areas, Parking Areas, and Trailheads**

These actions are the same as alternative B.

## **Vehicular Access to Gravel Bars**

These actions are the same as alternative B.

## **Accessible Routes and Trails**

These actions are the same as alternative B.

## **SELECTED ALTERNATIVE**

Based on the analysis presented in the EA, the National Park Service has selected alternative B for implementation. Alternative B better meets the purpose and need for the plan, representing a continuation of the most effective management actions under current management, as well as improving the system of park roads and trails to provide visitors with access to a wide variety of locations and experiences while also protecting the park's fundamental resources and values.

## **PRELIMINARY ACTIONS CONSIDERED BUT DISMISSED**

As part of developing alternatives for this roads and trails management plan, the National Park Service considered several alternatives and management actions. Some actions were eliminated from further evaluation because they either did not meet the purpose, need, or stated objectives of the plan to a large degree, could not be implemented for technical or logistical reasons, or were not consistent with the purpose or significance of the park. Rationale for considering and dismissing potential actions is provided below.

### **Allow Free-Range Horseback Riding**

Clearly marked and defined trails in appropriate management zones help manage trail use and direct it to the most appropriate areas of the park. Sensitive areas such as caves, archeological sites, wetlands, and stream crossings are distributed throughout the park, making their management and protection a challenge. Given the high equestrian use in the park, allowing "free-range" riding would lead to adverse effects on natural and cultural resources and would not meet the purpose and need for the plan.

## **Designate All Currently Undesignated, Visitor-Created Trails for Trail Use**

Over 90 miles of undesignated, visitor-created trails extend throughout the park. Many of these trails have not been properly sited and constructed and do not meet acceptable trail standards. Designating all these trails would lead to an excessive environmental impact on park natural and cultural resources and would not meet the purpose and need for the plan.

## **Close All Roads**

Properly sited and constructed roads help direct and manage park visitors in appropriate areas and help minimize resource impacts. As a park that extends across 134 miles of river and two distinct watersheds, visitor access and enjoyment of the park relies heavily on some level of road access. Many park visitors access the park via designated park roads, with a large portion of these being county- or state-managed roads, making closure of all roads technically infeasible. One of the major issues being addressed in this plan is reducing the number of undesignated, visitor-created roads and traces that have gradually become more established over time.

## **Open All Trails to Bicycle Use**

Not all the park's trails are suitable for bicycle use, and not all trails are suitable for mixed use. The National Park Service proposes designating the most appropriate areas for bicycle use and will evaluate additional opportunities in the future.

## **WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As defined in CFR 40 1508.27, significance is determined by examining the following criteria:

- 1. Impacts that may have both beneficial and adverse aspects in which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an Environmental Impact Statement.**

No significant impacts to resources were identified that would require analysis in an Environmental Impact Statement. Whether taken individually or as a whole, the impacts of the selected alternative do not reach the level of a significant effect because most adverse impacts associated with implementation would be temporary (lasting only as long as management actions are being executed), negligible, minor, or minor as a result of implementing best management practices and minimization measures. The overall beneficial impact on visitor experience, visitor safety, increased access, and resource conditions would be long term. Mitigation measures and best management practices identified in appendix G of the RTMP/EA would be implemented to further minimize any potential nonsignificant adverse impacts. Additional details on impacts to resources can be found in the environmental assessment.

**2. The degree to which public health and safety are impacted.**

Extensive safety measures will be incorporated into every proposed action. The selected alternative considers public health and safety in the context of designated roads, trails, recreation areas, and river crossings. Visitor safety would be enhanced by providing access to opportunities at clearly defined locations in the park with minimal duplication, minimizing conflict between use groups, and through appropriate design and placement. The separation of equestrian riders and bicyclists on trails would support safe visitor experiences. Undesignated roads can create longer response times for law enforcement personnel and more complex search and rescue operations. The closure of redundant undesignated roads could improve visitor safety. The high number of undesignated roads and traces created by off-road vehicle use and increased miles of undesignated equestrian trails can make navigation in some areas difficult and confusing for park visitors. Overall, the selected alternative would result in greater beneficial health and safety impacts over the no-action alternative and alternative C by providing safe access to a variety of locations and experiences and removal and restoration of all undesignated roads and most user-created trails to natural conditions. Appendix G of the RTMP/EA identifies mitigation measure and best management practices for the visitor experience and safety.

**3. Impacts to any unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands, or floodplains, etc.).**

The park retains numerous historic and cultural resources that reflect centuries of human use of a riverine environment. The impacts on hiking opportunities and equestrian uses in the Upper Current and Middle Current River areas would be mostly beneficial because visitors would have increased opportunities to experience fundamental resources and values of the park, such as the human occupation of and enduring connection to the Ozark Highlands, the karst-based hydrogeological system, and outstanding river recreation experiences (NPS 2016a). Equestrian use in the Upper Current River would be expanded to include a loop trail near the Susie Nichols Cabin and access through the Cedar Grove area to the Howell-Maggard Cabin, providing access to the rich cultural history of the Current River.

The selected alternative does not include any actions that would affect the overall cultural landscape or resources having specific cultural importance to affiliated tribes or their ability to access traditionally important resources and places. The National Park Service remains committed to ongoing and future government-to-government consultation with the tribes as appropriate.

As noted in the RTMP/EA, some proposed projects are not yet fully designed. Before construction of new trails (under the selected alternative) or rehabilitation and restoration of undesignated roads and trails (under the selected alternative), the park will consult with the Missouri SHPO to address action-specific Section 106 compliance requirements. With respect to new trails that would be phased in over time, the park will conduct appropriate inventories to identify archeological sites within the trail corridors.

The park will also conduct archeological inventories of undesignated roads and trails in advance of restoration and rehabilitation activities, in consultation with the Missouri SHPO. Further consultation with the Missouri SHPO and associated tribes will occur if archeological resources are identified that require mitigation (e.g., avoidance or possible data recovery if avoidance cannot be achieved through project redesign). Appendix G of the RTMP/EA includes best management practices and mitigation measures for the treatment of archeological and other cultural resources

In the Jacks Fork area, new hiking opportunities in the Jam Up Cave area will provide visitors an opportunity to explore around the cave on foot, see plants remaining from the ice ages, and connect to the karst-based hydrogeological system. Visitors would still not be able to enter the cave itself, as it would remain closed to protect bats. The impacts of the expanded hiking areas would have beneficial impacts because visitors would have increased opportunities to experience these unique flora and systems.

Regarding unique waterways, the Current and Jacks Fork Rivers are designated as Outstanding National Resource Waters by the State of Missouri and are afforded special protection against water quality degradation. Potentially adverse impacts to wetlands and waterways from implementing the selected alternative would likely have short-term, minor impacts to these resources during restoration and construction activities. These impacts would be minimized by implementing mitigation measures and best management practices (see appendix G of the RTMP/EA). Under the selected alternative, for example, undesignated river crossings would be removed and restored to natural conditions, which would reduce adverse impacts on water quality and sensitive aquatic species.

Designated river crossings and seven additional trail crossings designated along the Upper Current River would continue to provide opportunities for equestrian riders to see, experience, and cross the Upper Current River, which is designated as Outstanding National Resource Waters.

The walk-in gravel bar camping opportunities would also provide new opportunities for visitor access to the Current River. Note that water quality has been added to the RTMP/EA as an impact topic for detailed analysis.

While some minor environmental impacts would occur to unique resources and features in the area, such as equestrian and land-based motorized vehicle uses that would cause localized erosion and increased levels of turbidity in waterways, no long-term adverse impacts are anticipated. Restoring unauthorized social and illegal roads and trails to natural conditions would help preserve unique characteristics of the area. The proposed developments under the selected alternative would not significantly impact water quality of Current and Jacks Fork Rivers. Proposed actions would improve the condition of the riparian and aquatic qualities within the rivers and along river corridors in the long term. Although some short-term adverse impacts to water quality could occur, such as localized sedimentation, due to trail construction and restoration activities in localized areas (e.g., the horse trail crossing in the Upper Current River), the application of best

management practices and mitigation measures (appendix G of the RTMP/EA) would be expected to prevent water quality from degrading.

**4. The degree to which impacts are likely to be highly controversial.**

Throughout the plan development process, some identified environmental impacts have been indicated as controversial. During consultation with affiliated tribes, the Missouri SHPO, and the USFWS, no substantive concerns were expressed about the selected alternative that have not been addressed. During the recent public comment period from June 18 to August 18, 2021, some substantive comments and a high level of concern for water quality were expressed. Impact topics retained for analysis are included in chapter 3 of the RTMP/EA, Affected Environment and Environmental Consequences.

**5. The degree to which the potential impacts are highly uncertain or involve unique and unknown risks.**

The proposed action does not include potential impacts of a highly uncertain nature and does not have unknown risks. The proposed management actions address natural and cultural resource protection, visitor access and enjoyment, and park operations within the park. The anticipated impacts to resources, as analyzed in the environmental assessment, are not highly unique and do not involve unknown risks. Mitigation measures and best management practices will minimize risk to the human and natural environment identified in appendix G of the RTMP/EA. Resolving visitor, equine and ATV/UTV capacity issues and improvements to the trail program will meet project objectives by implementing strategies to expand visitor opportunities to experience the park's resources while still preserving sensitive natural and cultural resources. Visitor comments raised concern on potential impacts to water quality. Note that water quality has been added to the RTMP/EA as an impact topic for detailed analysis.

**6. Whether the action may establish a precedent for future actions with significant impacts or represent a decision in principle about a future consideration.**

The selected alternative does not establish a precedent for future actions with significant impacts because no significant impacts were identified as a potential result of the proposed actions nor does it represent a decision in principle about a future consideration.

**7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant impacts. Significance cannot be avoided by terming an action temporary or breaking it down into smaller counterparts.**

The environmental assessment concluded that implementing the selected alternative would not contribute impacts that would individually or cumulatively result in greater adverse impacts than other past, present, and reasonably foreseeable future actions.

**8. The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.**

Minor, short-term adverse impacts to archeological resources, historic structures, and cultural landscapes could occur from implementing the selected alternative.

Avoidance, minimization, mitigation measures, and best management practices would prevent or minimize potential adverse effects associated with the implementation of the selected alternative. In consultation with the Missouri SHPO, associated tribes, and other interested parties, the National Park Service would apply these measures to avoid or minimize cultural resource impacts. Best management practices and mitigation measures are listed in the RTMP/EA in the appendix G cultural resources section.

Under the selected alternative, expansion of the park's designated trail system (an additional 49.5 miles of new trails) has a limited or slightly increased potential to adversely impact historic structures and cultural landscape features as a result of construction disturbance and increased visitor use. Minor rerouting of trails may occur to protect sensitive resource locations. New horse staging areas, parking areas, and trailheads would also be developed, along with new horse crossing locations along the Upper Current River. The restoration of undesignated roads and trails and the removal of roads and traces in primitive zones may entail the use of mechanized equipment and vegetation grubbing that could also potentially disturb historic properties. However, all areas of proposed trail construction, restoration, and other development would be assessed by NPS cultural resources staff to ensure avoidance of significant sites.

Impacts to listed sites and contributing cultural landscape features would be avoided to the extent possible by redesign or other appropriate mitigation measures and best management practices (see appendix G for details). Limited adverse cumulative impacts on historic structures and cultural landscapes also would occur from implementation of the selected alternative in conjunction with other primarily ongoing or reasonably foreseeable actions.

Beneficial impacts on historic structures and cultural landscape features would result from park efforts (e.g., equestrian permitting system) to inform and educate visitors of the importance of protecting sensitive resources. No new road construction would occur and the reduction of designated public roads and traces would further contribute to long-term beneficial impacts by limiting the potential for site disturbance by new construction and ongoing road maintenance. Restricting vehicles to designated roads would further protect resources from unauthorized/off-road ground disturbance and erosion.

National Park Service staff would conduct any necessary archeological surveys, other resource-specific surveys, or National Register of Historic Places evaluations and identify recommended treatments. Because of the extensive mileage of proposed new trails, a phased approach to archeological surveys would be undertaken over multiple field seasons and coordinated with construction schedules. The results of these efforts would be incorporated into comprehensive planning and resource assessments, as well as site-specific planning, mitigation, and environmental analyses.

Besides the possibility of project-related impacts, long-term minimal or limited adverse impacts on archeological resources could occur from ongoing resource management, routine maintenance activities, visitor use, erosion, and other factors that could diminish resource integrity. Long-term beneficial impacts would be expected from NPS efforts to expand public awareness for resource protection. Limited adverse cumulative impacts on archeological resources also would occur from implementation of the selected alternative in conjunction with other primarily ongoing or reasonably foreseeable actions.

Best management practices and mitigation measures are listed in the RTMP/EA in the appendix G cultural resources section. Avoidance, minimization, mitigation measures, and best management practices would prevent or minimize potential adverse effects associated with the implementation of the selected alternative. In consultation with the State Historic Preservation Office(r), associated tribes, and other interested parties, the National Park Service would apply these measures to avoid or minimize cultural resource impacts.

**9. The degree to which an action may adversely affect Endangered or Threatened species or its habitat.**

Most listed species would not be affected by the proposed action. The implementation of the proposed action on bats and hellbenders may affect, but are not likely to adversely affect, either of these species.

Adverse effects on essential behaviors for listed bat species would be insignificant (i.e., immeasurable) and discountable (i.e., extremely unlikely to occur) for the selected alternative because the following stipulations would be adhered to: (1) the National Park Service would not cut trees or clear vegetation used as roosting sites or those used for maternity purposes, (2) the National Park Service would not conduct vegetation clearing for trails or other proposed facilities between November 1 and April 1 of any given year, and (3) the National Park Service would conduct detailed surveys and consider rerouting conceptual road and trail alignments discussed in this environmental assessment, as well as other proposed facilities if listed species or habitat occurs in those areas.

The National Park Service would first seek to avoid impacts where possible. If total avoidance is not possible, the park would minimize adverse impacts through stipulations and best management practices during construction. Finally, where adverse impacts cannot be avoided or minimized, they would be mitigated. Mitigation actions would be based on the location and conditions unique to individual road and trail segments associated with the selected alternative.

Effects on essential behaviors of hellbenders under the selected alternative would be insignificant and discountable. Directing visitor use to designated roads, trails, and other visitor facilities would provide park staff a means to reduce impacts on areas where monitoring indicates adverse effects from visitor use.

The National Park Service developed a biological assessment as part of the Roads and Trails Plan to analyze the effects of the proposed action on federally listed species (see appendix H). The biological assessment provides a “may affect, not likely to adversely affect” determination for the following federally listed species: Ozark hellbender, gray bat, Indiana bat, and northern long-eared bat. Following this comprehensive review and subsequent consultation, the USFWS concurred that the proposed action may affect, but would not likely adversely affect, any federally listed species or habitat or other special status species in the area.

The National Park Service initiated informal consultation in April 2015 with the USFWS Missouri Ecological Services Field Office to discuss the RTMP/EA and any potential impacts on federally listed species and their critical habitats. The most recent list of federally listed species was obtained from the USFWS Information for Planning and Consultation website on February 26, 2019 (consultation code: 03E14000-2018-SLI-0269). Using this list, the park determined which of those species and their critical habitats had the potential to occur in the plan study area. Federally listed species with the potential to occur in the study area, and critical habitat are further analyzed in a biological assessment prepared for the plan (NPS 2019). Subsequent telephone conversations and field visits and meetings occurred between May 2015 and February 2019 (see appendix H for details).

Under each alternative considered in this plan, the park would protect these species and their habitat, as required under the Endangered Species Act. The actions proposed in this plan would, in the long-term, reduce potential disturbance, enhancing the protection of these federally listed species. Further, no actions or new uses are being proposed that would result in the loss or disturbance of habitat for these species. The National Park Service would continue to discuss and consult with the USFWS after this plan is completed, including before implementing actions that could affect these species and their habitats.

**10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.**

The proposed action does not violate any federal, state, or local environmental protection law. The National Park Service has complied with all federal, state, and local laws with relevance to the selected alternative.

## **PUBLIC INVOLVEMENT AND AGENCY CONSULTATION**

During preparation of the RTMP/EA, the National Park Service consulted with federal and state agencies, tribes, interested and affected parties, and the public. The park notified the Missouri Congressional delegation as well. These activities are summarized in appendix I of the RTMP/EA and are detailed below.

### **Public Involvement**

Between October 26 and November 25, 2015, the park invited the public to share initial thoughts, concerns, and ideas to improve and manage the roads and trails network to ensure quality recreational experiences for park visitors while also protecting cultural and natural resources. During the public scoping period, approximately 295 individual correspondences were received, not including form letters. Of these, 231 were submitted directly to the NPS PEPC website. Approximately 76 people attended a public open house event held at Eminence High School in Eminence, Missouri, on October 26, 2015; 23 people attended the public open house event at the Van Buren Youth and Community Center in Van Buren, Missouri, on October 27, 2015; 48 people attended the public open house event at the Salem City Hall Auditorium in Salem, Missouri, on October 28, 2015; and 57 attended the public open house event at the Holiday Inn in Sunset Hills, Missouri, on October 29, 2015. During the public open house events, approximately 180 comments on flip charts and 25 comment cards were received. All handwritten comments received during the public open house events or via standard mail were transcribed and entered in the PEPC system. In addition, approximately 1,800 form letters were received.

Four public open house events in Salem, Van Buren, Eminence, and St. Louis provided the public an opportunity to share input on roads and trails management with NPS staff and provide ideas about possible management actions for the roads and trails plan. In March 2016, the park invited a diverse array of local and regional stakeholders to meet and discuss some road and trail management issues in the park and to help further inform development of preliminary alternatives. This meeting allowed participants to gain a better understanding of the differing viewpoints of other stakeholders and helped to improve dialogue and relationships between participants and park staff.

The park released a newsletter in November 2017 outlining preliminary draft management alternatives for review and comment. The newsletter was sent to 770 individual e-mail addresses on November 9, 2017. Additionally, approximately 1,722 hard copies were sent on November 16, 2017. Hard copies were also sent to various local, state, and federal governmental officials, tribal representatives, local business leaders, commercial users, and other individuals who had previously expressed interest in the planning process. On November 14, 2017, the National Park Service issued a news release announcing the comment period to reach members of the public not already on the distribution list for e-mail or hard copies. The public was encouraged to comment online and to identify any comments or concerns on the preliminary alternatives between November 17, 2017, and December 15, 2017. The comment period was extended to January 15, 2018, in response to commenters' requests. During public review of the preliminary alternatives, approximately 894 correspondences were received through the NPS

PEPC website and via mail and e-mail directly to the park. Comments were received from 20 states, Guam, and the District of Columbia. Two comments were received from other countries. Seven different form letters were received containing 595 total signatures; however, most comments came from private individuals.

Comments ranged from simply stating which alternative was supported or unsupported to detailed recommendations for implementation of an alternative concept. Many visitors expressed support for alternative A, the no-action alternative, noting that focusing on improving and maintaining current trails instead of creating new ones would save taxpayers money; however, many commenters suggested additions to this alternative such as increasing enforcement of park regulations. For alternative B, commenters stated support for closing undesignated river crossings, roads, and trails, while others expressed opposition because of the need for increased park management, particularly in equestrian use and primitive camping areas. Commenters expressed support for alternative C because it proposed the largest number of equestrian trails; others were opposed to the alternative because they are concerned that the trails would become overcrowded and unsafe. Some commenters noted that managing current trail use levels is already challenging.

The comments that the park received ranged from support or opposition for possible management actions to detailed recommendations for implementation of other possible actions. Respondents reported the primary visitor use-related issues to be a lack of parking, restrooms, and a primary point of contact for visitors in the park (i.e., a comprehensive visitor center), as well as high and/or concentrated use resulting in impacts on resources. Specific comments on the issues and actions evaluated based on the following topic areas:

- Congestion and crowding (including parking, public transit/shuttles, managed entry, managed access (in the park))
- Management of commercial use authorizations
- Facilities/infrastructure (including restrooms/changing stations, drinking water, and road improvements)
- Need for a park visitor center
- Enforcement
- Other feedback

In summer of 2021, the public was asked to review the RTMP/EA draft environmental assessment and share their comments beginning June 18, 2021. Due to several requests, the comment period was extended to August 18, 2021. During public review, the National Park Service received 1,453 comment correspondences (1,005 unique correspondences and 448 form letters), received through the NPS PEPC website or by mail sent directly to the park. Refer to attachment A for a summary of comments and NPS responses.

Striving to reach a broad audience, the park distributed announcements by e-mail and/or hard copy to local, state, and federal government officials, tribal representatives, local businesses leaders, commercial users, park neighbors, and other individuals who had previously expressed an interest in the planning process.

### **Missouri State Historic Preservation Office**

In keeping with the National Historic Preservation Act of 1966 (as amended), consultation occurred with the Missouri SHPO. In April 2015, National Park Service distributed a newsletter to the Missouri SHPO noting the intent to prepare a roads and trails management plan for the park.

The Missouri SHPO was provided with a review copy of the plan/environmental assessment on October 17, 2019, to assess the potential effects of the proposed alternatives on cultural resources. The National Park Service received a response on November 22, 2019, which stated that the completion of the planning document will not affect cultural resources and that the proposed methods for identifying historic properties outlined in the plan would be adequate for identification under Section 106 of the National Historic Preservation Act. The Missouri SHPO also expressed support for continued consultation on a project-by-project basis for future development, rehabilitation, and restoration activities proposed in the document. In accordance with Section 106, the National Park Service will continue to consult with the Missouri SHPO, associated NHOs, and other stakeholders as actions identified in the plan advance to more detailed design development and implementation stages.

Some proposed projects are likely to require further archeological assessment and additional Section 106 consultation with the Missouri SHPO and associated tribes as project designs are more fully developed and the areas of potential effect are better defined. Future 106 undertakings should proceed through consultation following the Nationwide Programmatic Agreement. The National Park Service will comply with all relevant cultural resources laws and policies, as well as the mitigation measures and best management practices identified in the RTMP/EA.

### **Native American Consultation with American Indian Tribes**

In accordance with Section 106 of the National Historic Preservation Act of 1966 (as amended) and with Executive Order 13175 (Government to Government Consultation with Indian Tribes), the park has initiated and engaged in consultation with the tribal communities that have cultural ties to Ozark National Scenic Riverways.

In April 2015, the National Park Service sent letters to eight tribal partners notifying them of the roads and trails plan, plan objectives, the intent to keep the tribes informed as the planning process progressed, and to invite their participation in the planning process. The National Park Service received responses from the Osage Nation requesting a copy of the draft plan, once complete. Newsletters were also sent to each of the tribes during public scoping and release of preliminary alternatives for public review.

Representatives from the eight tribes consulted in April 2015 included:

Edwin Butler-Wolfe, Governor, Absentee Shawnee Tribe of Indians of Oklahoma

Bill John Baker, Principal Chief, Cherokee Nation

C. J. Watkins, Acting President, Delaware Nation

Paula Pechonick, Chief, Delaware Tribe of Indians

Glenna J. Wallace, Chief, Eastern Shawnee Tribe

Scott Bighorse, Principal Chief, Osage Nation

Ron Sparkman, Chief, Shawnee Tribe

George Wickliffe, Chief, United Keetoowah Band of Cherokee

In October 2019, the National Park Service provided copies of an initial draft of the roads and trails plan to the eight affiliated tribes requesting input on the document. The National Park Service did not receive any comments on the draft plan, despite hopes for active participation. In an ongoing effort to improve relationships with tribal partners, the National Park Service planned a consultation meeting in April 2020 in Tulsa, Oklahoma, and sent invitations to tribal leadership and historic preservation officers in March 2020 to discuss the roads and trails plan in addition to other forthcoming projects. The meeting could not go forward as scheduled due to the COVID-19 pandemic.

Between October and December 2020, the National Park Service held individual meetings with five of the eight affiliated tribes' historic preservation staff to address the topics that had been on the agenda for the April 2020 meeting, including the roads and trails plan. Meetings were held with Elizabeth Toombs, Cherokee Nation Tribal Historic Preservation Officer; Erin Paden, Delaware Nation Historic Preservation Director; Brice Obermeyer, Delaware Tribe Director of Historic Preservation; Andrea Hunter, Osage Nation Tribal Historic Preservation Officer; and Tonya Tipton, Shawnee Tribe Historic Preservation Officer. Representatives from the Absentee Shawnee Tribe, Eastern Shawnee Tribe, and United Keetoowah Band of Cherokee Indians did not respond to meeting requests. In the meetings, NPS staff explained the need for the plan and answered questions about the various alternatives and the proposed archeological testing strategy. The National Park Service made the draft plan and supporting mapping available for the tribes to review and comment in May 2021, just before releasing the document for public review and encouraged responses and feedback both to the park directly and as part of the 30-day public response period.

The Cherokee Nation submitted a correspondence letter dated July 9, 2021, to the park stating that the nation does not foresee the project impacting Cherokee cultural resources. If items of cultural significance are discovered, activities will stop and the appropriate tribal offices will be notified.

## **US Fish and Wildlife Service**

Section 7 of the Endangered Species Act requires federal agencies to consult with the USFWS to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification to critical habitat. To meet this requirement, the National Park Service developed a biological assessment to analyze the effects of the proposed action on eight federally threatened and endangered species that were identified as potentially being found in the study area.

The National Park Service initiated informal consultation with the USFWS (Missouri Ecological Services Field Office) in an April 2015 letter. The letter notified the USFWS that the National Park Service was developing a roads and trails management plan for the area for the park. The letter also specified that the National Park Service was initiating informal consultation on the project. The National Park Service referenced the electronic list of federally listed plant and animal species, as generated by the USFWS, via the Information for Planning and Conservation system (<https://ecos.fws.gov/ipac>).

The USFWS office was provided with a draft biological assessment that aligned with the draft EA on October 17, 2019. The National Park Service received concurrence on the biological assessment on January 6, 2020. On April 21, 2021, the National Park Service notified the USFWS of additional minor map updates for roads associated with alternatives B and C, including the relocation of the Lewis Hollow Ford from its current location to the original or “traditional” crossing location. On May 14, 2021, the National Park Service confirmed with the USFWS that there would be no impacts near the proposed ford location. The National Park Service will continue informal consultation and reinstate consultation in the future, as appropriate, with the USFWS for their concurrence on elements of the plan that may require further compliance.

## **Negotiation with Shannon County**

In 1991, the National Park Service released a roads and trails study and environmental assessment. Shannon County Commissioners objected to this document, claiming an additional 32 roads for county maintenance and control. This study had been through extensive public input and consultation, including with the county commissioners, before completion. The 1991 Roads and Trails Study was implemented, even though the 32 roads remained disputed.

As part of the current planning effort, the National Park Service and Shannon County Commissioners acted in good faith to negotiate and resolve the jurisdictional dispute over these 32 roads, plus several other recently claimed roads and fords, some of which required agreement with private landowners. In an effort to diligently address issues presented by the Shannon County Commissioners regarding the recently claimed roads, as well as the originally disputed roads, the National Park Service extensively investigated each road the commissioners disputed and attempted to resolve the disputes.

In summary, the National Park Service and Shannon County reached a tentative agreement on the jurisdiction of the original 32 disputed roads that were the subject of this negotiation. However, negotiations failed to reach agreement on several roads that were not part of the original list. Even though the National Park Service and Shannon County were unable to reach

agreement before releasing this plan, many elements of the tentative agreement have been incorporated in the plan to accommodate the county's requests. There are currently no disputes over any roads in Carter, Dent, or Texas Counties.

### **External Consultation and Coordination – State of Missouri**

Kathy Harris, Advisory Council on Historic Preservation

Sarah Parker Pauley, Director, Missouri Department of Conservation

Mark A. Miles, Missouri State Historical Preservation Office

Toni M. Prawl, Director, Missouri State Historical Preservation Office

### **Internal Consultation and Coordination – Ozark National Scenic Riverways, NPS**

Eric Daniels, Chief of Resource Management

Chris Figge, Jacks Fork District Ranger

Mike Gosset, Resource Management Biotech

Victoria Grant, Natural Resources Specialist

Rick Halbert, Chief of Operations

Eric Herndon, Upper Current District Ranger

Kim Houf, Terrestrial Ecologist

Patrick Jackson, Lower Current District Ranger

Larry Johnson, Superintendent (retired)

Jason Lott, Superintendent

Dena Matteson, Chief of Interpretation, Planning, and Partnerships

Austin Konkel, Upper Current Ranger

Bill McKinney, Upper Current Law Enforcement

Russell Runge, Deputy Superintendent

Joe Strenfel, Environmental Protection Specialist

Peggy Tarrence, Concession Specialist

Debbie Wisdom, Chief of Administration

Allison Young, Park Archeologist

Kevin Young, Facility Maintenance Specialist

### **Internal Consultation and Coordination – Midwest Region Office, NPS**

Tokey Boswell, Chief of Planning and Compliance

Christine Gabriel, Regional Environmental Coordinator

James Lange, Planning Portfolio Manager

Aleksandra Pitt, Planning Portfolio Manager

### **Internal Consultation and Coordination – Denver Service Center Planning, NPS**

Laura Babcock, GIS Specialist, DSC Planning

Scott Babcock, Project Manager, Senior Planner

Kerri Cahill, Branch Chief

Steve DeGrush, Natural Resource Specialist

Wanda Gray Lafferty, Contract Editor

Ray McPadden, Assistant Project Manager (former)

Jennifer Stein, Visitor Use Project Specialist

Steve Whissen, Cultural Resources Specialist

Andrew White, Visitor Use Project Specialist

### **Contractor Support**

Steve Butler, ERO Resources

Bill Mangle, ERO Resources

Jeff Gutiérrez, Environmental Planner, Louis Berger Group

Lisa McDonald, Natural Resource Economist, Pinyon Environmental

### **FINDING OF NO SIGNIFICANT IMPACT**

Based on review of the facts and analysis contained in the RTMP/EA, the National Park Service has selected alternative B, as described above, for implementation. The selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement. The proposed action would not have a significant effect on the

human environment in accordance with Section 102(2)(c) of the National Environmental Policy Act.

Environmental impacts that could occur are limited in context and intensity, with generally beneficial impacts on visitor use and experience and opportunities, fish and wildlife habitat, and resource conditions. There would be no unmitigated adverse impacts on public health, public safety, vegetation, or federally threatened or endangered species.

No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative impacts, elements, or precedence were identified. Implementation of the actions would not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this project, and thus, will not be prepared. The Ozark National Scenic Riverways Roads and Trails Management Plan will be implemented as soon as practical.

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Recommended: \_\_\_\_\_

Jason Lott, Superintendent

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Approved: \_\_\_\_\_

Herbert C. Frost, Ph.D., Regional Director  
National Park Service, DOI Regions 3, 4, and 5

\_\_\_\_\_  
Date

Attachment: Errata and Response to Comments

## ATTACHMENT A: ERRATA AND RESPONSE TO COMMENTS

The Roads and Trails Management Plan EA plan (RTMP) was made available for public review on June 18, 2021. After multiple extension requests, the National Park Service extended the comment period to August 18, 2021.

This section includes both minor edits and technical revisions to the RTMP/EA that resulted as a response to comments received from general commenters and consultants during the public review period. Additionally, this section contains responses to substantive public comments on the plan. In some cases, the National Park Service chose to respond to nonsubstantive comments received during the review period when doing so helped clarify aspects of the selected alternative.

### ERRATA – EDITS TO THE ENVIRONMENTAL ASSESSMENT

Commenters noted the following revisions in the plan text that require correction or additional clarification:

Section	Revision or Change
Table of Contents	Replace “Environmental Consequences of Alternative C (Current Management) on Threatened and Endangered Species” with “Environmental Consequences of Alternative A (Current Management) on Threatened and Endangered Species.”
Section 1.4.1	Replace “211 miles” with “230.5 miles.”
Section 1.6	Delete all text and the footnote about dismissing Water Quality as an impact topic, because it has been added as a new impact topic in the RTMP/EA.
Section 2.2.8	Delete the last sentence of section 2.2.8 Vehicular Access to Gravel Bars, sentence is repetitive to previous sentence: “ <i>Walk-in camping opportunities would be provided at some gravel bars formerly accessible by vehicles.</i> ”
Section 2.4.3	Add “The authorized vehicle fords are Akers Ford, Banks Ford, Ratliff Ford, and Blue Spring Ford.”
Section 3.6.3	Replace “Environmental Consequences of Alternative C (Current Management) on Threatened and Endangered Species” with “Environmental Consequences of Alternative A (Current Management) on Threatened and Endangered Species.”
Section 3.6.5	Replace “Cumulative Impacts of Alternative C on Threatened and Endangered Species” with “Cumulative Impacts.”
Appendix B, Figure B-1	Abandoned fire tower and access road are no longer shown on the park map; this road should not be used by motorized vehicles for either public or administrative purposes.
Appendix C	Sentence before table C-8, replace “tail” with “trail.”
Appendix C, Other Areas	Under Alternative C for Pulltite Trail, second sentence, replace “look” with “loop.”
Appendix C, All-Terrain Vehicle and Utility Task Vehicle Use	Under Guideline 1: Determine the Analysis Area(s), change “Parker Ford” to “Parker.” Parker is not an authorized vehicle ford.

Section	Revision or Change
Appendix D, Maps B-1 and C-1	Revise the proposed hiking/equestrian trail near Big Creek Trail ride by omitting a section of the trail shown to the south of CRB-381.
Appendix D, Maps B-1 and C-1	At Bluff School, the square for the school is located on the wrong side of the present horse trail. Show the horse trail on the south side of the school.
Appendix D, Maps 3 and 4	Change name of Round Spring Spur of Ozark Trail to Upper Current section of the Ozark Trail.
Appendix D, Map 4	Remove Road 2-3049 from all maps.
Appendix D, Map 5	Change label on "Broadfoot Primitive Area" to "Broadfoot Backcountry Area."
Appendix D, Map 6	Move the MDC Road label down to shaded green area and leave the road line green. Relabel as "NPS 769."
Appendix D, Map 6 and 7, and Appendix E	Change "Log Yard Access" label to "Moss Access."
Appendix D, Map 7	Add red NPS road segment north from Chilton Creek River Access area to former Pin Oak area.
Appendix D, Map 8 and Appendix E	Change label of "Club House Primitive Area" to "Club House Backcountry area."
Appendix D, Map 9 and Appendix E	Retain Cedar Spring Backcountry Area and road. Add section of trail to connect Cave Spring trail to Hickory in Alternative B.
Appendix D, Map 10 and Appendix E	Add "Ratliff Ford" on Upper Jacks Fork near park western boundary (where CR3940 on south side of river connects to 5-3179 on north side of river). Change Road 3179 to a county road. Change name of "Baptizing Hole Primitive Area" to "Baptizing Hole Backcountry Area." Change name of "Bacher Landing Primitive Area" to "Bacher Landing Backcountry Area."
Appendix D, Maps 10 and 11	Road 5-3191 is private and should not be shown on the maps.
Appendix D, Map 11 and Appendix E	Change labels on Jones, Searcy, Upper Dixon, and Lower Dixon from "Primitive" areas to "Backcountry" areas. Change NPS 771 to a hiking trail. Road shown adjacent to intersection of NPS 222 and NPS 156 is for administrative use only.
Appendix E	Change camping designation from "primitive" to "backcountry" for Jerktail Campground, Broadfoot Backcountry Area, Club House Backcountry Area, Baptizing Hole Backcountry Area, and Bacher Backcountry Area.
Appendix E	Akers Ferry Group Site should be marked as "backcountry camping" and not "developed camping."
Appendix E	Chubb Hollow Campground should be marked as "backcountry camping" and not "developed camping."
Appendix E	Jones, Searcy, Upper Dixon, and Lower Dixon sites should be marked as "backcountry" and not "primitive." Authorized uses for Cedar Spring Backcountry Area would apply to all alternatives.
Appendix J, Glossary	Add definitions to the Glossary: recreation area, primitive area, primitive campsite, developed campground, backcountry campsite, backcountry area, state natural area.

Section	Revision or Change
Appendix L	Change "Howell Ford Road" to "Howell Road." Howell Road is not an authorized vehicle ford.
Appendix L	Change "Wide Ford Road" to "Wide Road." Wide Road is not an authorized vehicle ford.

## Response to Comments and Issues

During public review, 1,453 comment correspondences (1,005 unique correspondences and 448 form letters) were submitted to the National Park Service. Most correspondences came from Missouri, followed by the nearby states of Illinois, Iowa, Arkansas, and Kansas, and other states. This report summarizes the comments received during the public comment period and provides NPS responses to those comments.

Commentors' statements of support mentioned:

- Protecting natural resources
- Developing new hiking and biking trails
- Additional horse crossings
- Limiting access to ATVs
- Closing and restoring undesignated trails
- Reducing equestrian overuse
- Balancing the need for resource protection and recreational use

Commentors' statements of opposition mentioned:

- Reduced access for equestrians
- Increased maintenance costs
- Suggested 25 to 45 miles of equestrian trails, as provided in 2014 General Management Plan

Other specific comments on the EA that are not already addressed or fully addressed in the "Minor Edits to the Environmental Assessment" section are summarized below in concern statements. The NPS response to the concern statements are listed following each concern statement.

### Equine Use

#### *NPS Response to equine use comments:*

Horseback riding is currently a permitted use on the trails for which it is designated and is an important and valued recreation activity that connects thousands of visitors to the park each year. As popularity of this activity has increased, so too has the need to actively manage its use.

The purpose and need (section 1.1, chapter 1 of the RTMP/EA) states that a plan is needed to ensure that designated<sup>10</sup> roads and trails and associated public recreation areas are clearly documented going forward and that undesignated<sup>11</sup> roads and trails are properly restored<sup>12</sup> to protect the park's natural and cultural resources and improve visitor safety. Use of undesignated, visitor-created roads and trails have led to resource concerns and safety issues for visitors, including longer response times for law enforcement personnel and more complex search and rescue operations. Restoring redundant and undesignated roads would improve visitor experience, visitor safety, resource conditions, provide cost savings, and allow more investment in designated visitor facilities throughout the park. The selected alternative meets this purpose.

1. **Closure and restoration of unauthorized trails** is intended to promote and encourage use of designated, authorized trails. While this practice may change use patterns for some trail users, it would not necessarily result in increased congestion on authorized trails. The National Park Service has evaluated this issue “holistically” in terms of evaluating all available trails available to the public, permitted trail uses, and other related issues, such as available parking, numbers of trailheads/access points, equine staging areas, and available interpretation/signage. More specifically, NPS staff will employ techniques designed to relieve congestion and disperse trail use from one area to another. A permit system is implemented when trail use increases to a level that causes negative impacts to park resources and desired visitor experiences (e.g., overcrowding on designated equestrian trails).
2. The National Park Service would seek to **establish a permitting system** under the selected alternative for equestrian users and would require individual riders to secure a permit (possibly online via the recreation.gov system, at park headquarters, or at other visitor contact points) before riding on park trails. When established, the permitting system would provide information and education to riders, help track the volume of use on equestrian trails, and enable the park to manage the levels of use on equestrian trails. Equestrian rider numbers and timing of use would be managed to spread use more evenly throughout the day on different trails to reduce congestion. A permitting system is a management tool that would ensure that trail use is more controlled and natural resources along trail corridors are maintained and preserved.
3. **Equestrian group size** is analyzed in Section 3.2.4 Environmental Consequences of Alternative B (NPS Preferred Alternative) on Visitor Use and Experience, “Permit for Horseback Riding” in the RTMP/EA. Depending on the maximum group size allowed under

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<sup>10</sup> Designated roads include roads within the park that have been authorized by the National Park Service through a formal planning process and which are designed, constructed, and maintained by the National Park Service in accordance with NPS road standards.

<sup>11</sup> Unauthorized, visitor-created trails that are not part of the official road and trail system.

<sup>12</sup> Additional information on restoration is provided in chapter 2 and in “Appendix G: Mitigation Measures and Best Management Practices.”

the permit system, visitors may have to travel through the park in smaller groups. The exact number of horses has not yet been determined. However, the selected alternative states the park would seek to implement an equestrian permitting system for horseback riding (See Section 2.5 Summary of Key Alternative Elements of the RTMP).

4. The riparian community is one of the most diverse, dynamic, and complex terrestrial habitats in the park. Some unauthorized equestrian use currently disturbs riparian vegetation along the rivers. The selected alternative states that **new trail alignments** would be largely concentrated in the Upper Current River District; many of these trails would incorporate some portions of existing undesignated trail alignments, although new alignments would be constructed. Designated trails would be aligned to minimize potential impacts on sensitive cultural and natural resources. The selected alternative includes a wide variety of management strategies and mitigation measures, listed in appendix G of the EA, that would serve to minimize adverse effects on natural resources. The final alignments for trails would be reviewed by the park's natural and cultural resources experts to ensure impacts on sensitive resources are minimized. If any sensitive resources are discovered during trail construction, that work would cease, and the area would be surveyed in more detail so that impacts could be avoided or minimized and/or an alternate route could be established. Most of the undesignated, visitor-created trails would be removed and restored to natural conditions. Additionally, the RTMP/EA, section 2.2.7, states that a "new horse staging and parking area and the trailhead would be placed at an appropriate distance from the river to the extent feasible to protect sensitive resources such as riparian zones." Note that water quality has been added to the RTMP/EA as an impact topic for detailed analysis.
5. The selected alternative identifies one **new horse staging area** to be created at Cedar Grove. The proposed horse staging area at Cedar Grove is in a centralized location, takes into consideration resource concerns, and meets the purpose of the RTMP/EA. See table 2.5 and Section 2.2.7 New Horse Staging Areas, Parking Areas and Trailhead of the RTMP/EA.

Horse staging areas at Baptist Landing and Akers Ferry were considered but dismissed due to potentially significant resource impacts of siting staging areas at these locations. In addition, there are no horse trails that lead to Baptist Landing. Akers Ferry is not a suitable horse staging location because it is in the flood zone and prone to congestion and potential visitor-use conflicts that could occur there.

6. **Resource protection concerns at the Nichols Cabin area** would be addressed through the selected alternative to protect sensitive resources. The information is stated in the RTMP/EA, Appendix C Analysis Areas, Nichols Cabin, Guideline 4. Identify Visitor Capacity. Management strategies under the selected alternative would improve resource conditions and enhance the riding experience at Nichols Cabin. To accomplish this, a total of 49.5 miles of new trail inside and outside the park jurisdictional boundary would be available, including 23.5 miles of new trail for equestrian and pedestrian use. National Park Service staff would assess and implement appropriate drainage techniques to reduce erosion. NPS staff would also consider hardening the area closest to the cabin to prevent continued damage to the historic structure. These strategies would allow current use levels to be increased because of more sustainable trails and improved resource conditions. During

especially wet times of the year, the capacity in this area could be decreased, adjusted, or trails could be closed to protect trail conditions and resources. Equestrian riders and pedestrians would share the trails in this area. If damage occurs to historic structures as a result of horse and or foot traffic, the National Park Service would address those issues as they arise to protect these important structures.

7. One commenter suggested **limiting the size of equestrian groups to no more than 10 horses**. Another commenter suggested the National Park Service should assess carrying capacity for equestrian use. Other commenters stated that no more horse trails should be added until the National Park Service can manage the current volume of equestrian use and ensure equestrians are not violating the rules and damaging resources.

In response, equestrian rider numbers and timing of use would be managed through a permit system to spread use more evenly throughout the day on different trails and to reduce congestion. At high-use equestrian areas such as Two Rivers, the plan proposes use limits (e.g., 25 riders per trail at one time). Implementation of a proposed equestrian permit would be used to help manage visitor capacity. The equestrian permit system and visitor capacities established in this plan would balance the plan's purpose to provide access to a variety of locations and experiences while also protecting park resources. Commenters also noted the stretch of river from the park boundary to Cedar Grove is designated by the Missouri Department of Conservation as a Blue Ribbon Trout Area and that heavy equestrian use can impact fish habitat and recreational fishing qualities. The National Park Service is responsible for determining an appropriate amount of access to areas within the park (i.e., for equestrian users and other use types). As recreational fishing is one of the several important visitor activities at the park, public concerns about protecting fishing qualities also supports implementing a permit system to better manage equestrian use.

8. One commenter suggested that equestrian trails should not be designated in fragile riparian areas. Another commenter suggested the plan should keep horse trails at least 50 feet from rivers and provide horse tie ups so riders can access the river on foot at designated access points. Horse droppings are likely to spread invasive plants.

In response, equestrian trails would be sited an appropriate distance from riparian areas and to the extent feasible to protect sensitive resources. Trail alignments would be designed and located to minimize adverse impacts to important and vulnerable resources like riparian and wetland areas and would direct trail use to other designated trails or new trails having more suitable soils. Adjustments to the timing and distribution of trail use would help to further protect sensitive park resources. In addition, mitigation measures and best management practices in the plan would minimize potential adverse effects of equestrian and other visitor use activities.

9. A commenter suggested equestrians should be routed to a hitching post to reduce impacts at sites like the Susie Nichols Cabin. Another commenter suggested that **access to historic sites should be on foot only** and the horse trail proposed northeast of Maggard Cabin is unnecessary and would cause resource damage.

In response, if damage is occurring to historic structures because of horse or foot traffic, the National Park Service would address those issues as they arise to protect historic and other important structures.

## **Mountain Biking**

### *NPS response to mountain biking and use of ATV/UTVs comments:*

Biking would continue to be allowed on designated park roads. New bike trails would be formally designated along 5.8 miles of the Old Tram Road and 4 miles of existing trails in the vicinity of the Partney Ridge and Partney House Trails; no biking is proposed for the Pulltite Nature Trail under the selected alternative. In the future, if a property owner is receptive, the park would consider additional loop and connector trails extending both inside and outside the park along the 5.8 miles of new trail that would be designated on Old Tram Road. **The Old Tram Road, located in the Lower Current River area, would provide increased access for bikers and hikers.** This has beneficial impacts, as this trail is unique and provides new access and trail mileage for visitors. E-bikes would be allowed in all locations traditional bikes are allowed. Alignments for these possible new trails along Old Tram Road would be identified as part of future planning.

**ATV/UTV riders would have access to 60 miles of roads under the selected alternative,** including Old Tram Road. Old Tram Road would continue to have vehicular access and remain open for hiking and biking. Comprehensive ATV/UTV policies are currently in development. The National Park Service would implement a future process to determine the appropriate level of ATV/UTV use on roads.

1. Some commenters suggested that the **separation of equestrian riders and bicyclists** on trails would support safer visitor experiences.

In response, the selected alternative would increase trail mileage and provide more opportunities for equestrian riders and bicyclists to pursue their respective recreational endeavors on designated and dedicated trails. However, as can occur on any trail system and despite the separation of user groups, the potential for user conflicts may remain among user groups throughout the expanded trail system.

2. Some commenters raised concerns about **mountain biking impacts on sensitive vegetation.**

As noted in the affected environment/environmental consequences chapter of RTMP/EA, no known areas of sensitive vegetation exist along the proposed bicycle trails, as indicated. Some adverse impacts would be expected to vegetation in general, however, as additional biking could have small trampling impacts to vegetation along the Partney Trail, south of Big Spring and the Old Tram Road in the Lower Current River District. Increased access to the river could increase the spread of invasive plant species. However, all new trail proposals would follow formal NPS trail planning, design, construction, and maintenance in accordance with sustainable trail standards.

The park is expecting increased traffic on the Round Spring Trail due to the completion of the Upper Current section of the Ozark Trail. Visitor-created trails are a concern around the spring and spring branch. These trails are currently being addressed with signage and natural barriers in strategic locations. Not all the park's trails are suitable for bicycle use, and not all trails are suitable for mixed use. The National Park Service proposes to designate the most appropriate areas for bicycle use and would evaluate additional biking opportunities in the future.

## **Trail Layout and Visitor-Created Trails**

### *NPS response to trail layout and visitor-created trails comments:*

The park currently provides 77 miles of designated hiking trails. The selected alternative would add an additional 16 miles of new hiking trails, 23.5 miles of new horse and hiking trails, and 10 miles of new bike and hiking trails (see Table 2.5 Summary of Key Alternative Elements of the RTMP/EA).

Designating all currently undesignated, visitor-created trails for trail use was an alternative considered but dismissed in the RTMP/EA (Chapter 2 Alternatives, Section 2.6 Alternatives Considered but Dismissed, Section 2.6.2). Over 90 miles of undesignated, visitor-created trails extend throughout the park. Many of these trails have not been properly sited and constructed and do not meet acceptable trail standards. Designating all these trails would lead to too great of environmental impact on park natural and cultural resources and would not meet the purpose and need for the plan.

1. One commenter noted the proposed trails from Susie Nichols to Schafer Springs and from Upper Current section of the Ozark Trail south to the Jerktail Loop Trail should be for hikers only and not open to equestrian use. In response, the plan does not propose any equestrian use from Nichols to Shafer Spring or from Round Spring to Jerktail, so no impact from horse use is expected.

## **River Use/Crossings**

### *NPS response to river crossings, vehicle fords, vehicular and motorized use, and access to gravel bars comments:*

Several concerns were noted regarding the number of new horse crossings proposed in the plan. To balance access while protecting park resources, the selected alternative would close and restore undesignated river crossings to reduce potential impacts on water quality and sensitive species. The seven existing designated horse trail river crossings would continue to be provided. While closing unauthorized crossings may change use patterns for some trail users, it would not necessarily result in increased congestion in the park, as many of the unauthorized crossings were near another crossing. Seven additional trail crossings would be designated on the Upper Current River to direct use away from dozens of informal, undesignated crossings. The average width of the proposed crossings is approximately 100 feet. Horseback riders would continue to be required to cross the river only at the 14 total designated crossing points.

1. General opposition was expressed to the continued **use of vehicle fords**. To clarify any confusion related to proposed actions with vehicle fords, an action common to all alternatives, the RTMP/EA states in Section 2.4.3: “Currently, there are several vehicle fording sites on the Current River, Jacks Fork River, and major tributaries. While the plan does not propose to close any crossings associated with any county’s road network, the National Park Service will continue to evaluate roads that cross streams to determine their necessity.” Reductions in undesignated river crossings and vehicle fords would also contribute to the protection of archeological resources along the river terraces. The National Park Service will explore best management practices to mitigate resource impacts tied to vehicle fords associated with county roads and will cooperate with county commissioners on their implementation. Such mitigation measures may include bridges, hardened low-water crossings, culverts, or closures, as appropriate (RTMP/EA appendix G).
2. To clarify the plan’s proposed uses at Log Yard, RTMP/EA Section 2.2.8 **Vehicular Access to Gravel Bars** indicates that a designated camping area would be established on the Log Yard gravel bar. This site would be managed for individuals accessing their campsites using a licensed vehicle. The park would retain the flexibility to manage access or close the Log Yard gravel bar to vehicle access to improve safety, reduce crowding, enhance visitor experience, and protect park resources. Ultimately, Log Yard would be open unless the park deems it necessary for closures based on the above listed parameters. Gravel bars such as those at Log Yard are generally more stable in contrast to smaller gravel bars, which are commonly affected by elevated river flows and flood events.

The National Park Service acknowledges general concerns for resource impacts from visitor uses along park rivers. Management actions are predominantly included in the park’s general management plan, which addresses river-based visitor capacity on waterways as well as visitor capacities at gravel bars. Water recreation is outside the scope of the RTMP/EA but may be addressed in a future river management plan.

3. The RTMP/EA establishes designated areas of use for **motorized watercraft to access gravel bars**. Visitors using motorized and nonmotorized watercraft could continue to camp on gravel bars a minimum of 0.5 mile from any designated campsite and more than 50 feet from a designated recreation area.<sup>13</sup> Water recreation is outside the scope of the RTMP/EA but in a future river management plan this topic could be addressed.
4. One commenter suggested that vehicle fords should be removed or replaced with spanned bridges. Other commenters noted that the plan should **limit, remove, or eliminate vehicle fords** all together. The ford at Akers Ferry should be removed and river crossings north of Cedar Grove should be eliminated, commenters indicated. Similarly, another commenter said that the low water dam at Cedar Grove should be removed, as it impedes fish passage.

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<sup>13</sup> Larger gravel bars, such as those at Log Yard and Two Rivers, are generally more stable in contrast to smaller gravel bars, which are commonly affected by elevated river flows and flood events.

In response, the park noted that constructing bridges in future planning efforts would be good options to consider at both Akers and Cedar Grove. The park will continue to work with state and county partners regarding proposals to remove the Akers Ferry ford and low water dam at Cedar Grove. Until bridges can be built, these fords and structures will likely remain in use.

## **ATVs and UTVs**

### *NPS response to use of ATV and UTV comments:*

1. To provide clarification on public comments related to **regulated ATV and UTV use**, these vehicles are not currently allowed on park roads; however, park managers are aware that unauthorized ATV/UTV use occurs. Under the selected alternative, ATV/UTV riders would be authorized to use 60 miles of designated NPS roads in the park. The visitor capacity for ATV/UTV use for NPS road use would be a slight increase from existing use levels (approximately seven riders per day) identified during the NPS monitoring effort. The visitor capacity is 15 ATV/UTV riders in the Jacks Fork District, 15 in the Upper Current, 15 in the Middle Current, and 15 in the Lower Current at one time. Larger groups are acceptable on occasion; any groups with more than 15 visitors or riders would need to obtain a special use permit in advance of their ride. This visitor capacity assumes use patterns would remain consistent with the August to December 2018 “observation period” when the Riverways began documenting observed ATV/UTV use on NPS public use roads. This visitor capacity is also consistent with relevant research, ensuring a low density of riders and high dispersion on roads to reduce safety concerns and ensure social conditions for riders persist. As ATV/UTV use continues to be distributed throughout the park, this visitor capacity would be protective of desired conditions.

Permitting equestrian, UTV, and ATV use may have some short-term adverse impacts because of the added step associated with securing a permit during pre-trip planning.

## **Roads**

### *NPS response to uses of roads comments:*

1. To provide clarification on public comments related to **uses of roads**, the RTMP/EA selected alternative would close certain roads. However, a total of 216.5 miles of public roads would be provided to support many recreational use options. All undesignated roads would be removed and restored to natural conditions, including roads identified for closure in the 1991 Roads and Trails Study that have not been closed to date. The National Park Service would close about 14.0 miles of currently designated NPS-administered roads—2.5 miles of which are in primitive zones. A large portion of these NPS-administered roads are in the primitive zone near Pulltite Campground. The Old Tram Road, located in the Lower Current River area, would provide increased access for bicyclists and hikers. Approximately 14 miles of NPS public use roads would be closed due to the presence of other routes that are available in and to the same locations, that are in unstable or unpassable conditions, or are resource concerns.

The removal or alteration of some roads and traces could possibly disturb or curtail traditional access to places of cultural importance, such as **family cemeteries**. National Park Service staff would continue to provide respectful protection of family cemeteries in the park and would maintain appropriate access for family descendants and others on a case-by-case basis.

2. Regarding public comments related to **private property access**, appendix A of the RTMP/EA lists relevant policies in accordance with *2006 NPS Management Policies* (Section 8.6.5 Access to Private Property). The policy states that the National Park Service will allow access to the private property of adjacent landowners and property of landowners within park boundaries (1) when it would contribute in a material way to the park's mission without causing unacceptable impacts on park resources or values or the purposes for which the park was established or (2) when access is the landowner's right by law or by deed reservation.
3. Many commenters suggested **additional roads remain open and others closed to public and administrative or emergency access**. At this time, the National Park Service proposes implementing actions identified in the RTMP/EA, Section 2.5 Summary of Key Alternative Elements. In response to concerns about access to emergency vehicles, the purpose and need section of the RTMP/EA addresses this concern: "Use of undesignated, visitor-created roads and trails have led to resource concerns and safety issues for visitors, including longer response times for law enforcement personnel and more complex search and rescue operations." Although the selected alternative proposes 14 miles of public use roads for closure, the National Park Service still offers 60 miles of public use for visitor use and access; a number of these roads are designated as multi-use or for equestrian use only.

In response, maps of roads and trails for the selected alternative (RTMP/EA, appendix D) depict the designated system of roads, trails, recreation areas, vehicle fords, and trail river crossings. Any locations not shown on the maps are undesignated and are unauthorized. If the road in question is not on the map, then it is likely unauthorized and will be closed. All designated roads and trails would be marked with appropriate signage. All undesignated roads, trails, and river crossings would be removed and restored (see appendix G). Private, state, and federal non-NPS roads within park boundaries may not provide public access, which is at the discretion of the easement holder and private landowner.

4. Regarding public concerns about road **closures to unauthorized roads that would potentially limit access to those with poor health or disabilities**, the National Park Service affirms under the selected alternative that it cannot maintain unauthorized roads for public use. Undesignated, visitor-created roads and trails have led to resource management concerns and safety issues for visitors, including longer response times for law enforcement personnel and more complex search and rescue operations. The plan authorizes the use of many roads visitors can use to access the park and support recreational opportunities.

In addition, the selected alternative, Section 2.2.9 Accessible Routes and Trails in the EA, states that future accessibility improvements associated with the park's Accessibility Self-Evaluation and Transition Plan would provide additional opportunities and beneficial impacts for visitors to access and enjoy the park near key park sites, such as the Alley Spring

Mill and Schoolhouse, Big Spring, Round Spring and Two Rivers Campgrounds, and amphitheater. In addition, a quarter mile of accessible trail from the parking lot to Blue Spring would be constructed. Trails identified in appendix K having desired trail classes of “4” or “5,” as well as any new trails that meet these classifications, would be considered for universal access per the ABAAS. The ABAAS ensures that National Park Service and partner facilities, programs, and services are accessible to and usable by all people, including those who are disabled. This policy is based on the commitment to provide access to the widest cross section of the public and to ensure compliance with the.

## **Indicators, Thresholds, Monitoring, and Visitor Capacity**

### *NPS response to indicators, thresholds, monitoring, and visitor capacity comments:*

1. Regarding one comment that suggested that **the EA does not contain sufficient information about what the desired conditions are and the impacts on the desired conditions**, the desired conditions are included in table 1 in section 1.6. Desired conditions are intentionally qualitative in nature. The indicators described in appendix F translate those desired conditions into measurable attributes that can be monitored over time to assess impacts.
2. Regarding a comment that suggested that removing four primitive recreation areas is contrary to increasing visitor capacity, reduces opportunities for solitude, and that **usage and impacts for these areas is unclear**, the primary reason for removing these areas would be to remove the NPS-administered roads that provide access. Without access, the recreation areas could not be maintained. Overall, 94 recreation areas would be designated under the selected alternative, so any impact on the ability of the park to accommodate use or provide opportunities for solitude from the loss of these four sites would be negligible. Visitors would continue to have access to 94 recreation areas along the 134-mile river corridor. In addition, many of these locations are duplicative, and other recreation areas nearby provide a similar experience; therefore, impacts on visitor use and experience would be negligible.

Removing roads in the primitive areas would result in a beneficial impact on visitor use for those seeking a quiet, contemplative experience and an adverse impact on those visitors who will no longer be able to access these areas in the same way. Opportunities for solitude and primitive recreation could be potentially enhanced through a reduction of duplicative areas, reducing the numbers of users. These cumulative impacts are discussed in Chapter 3 Affected Environment and Environmental Consequences of the RTMP/EA.

3. Regarding a comment that suggested the plan should **use miles of road as a monitoring indicator instead of number of roads**, the plan identifies thresholds as no visitor-created roads leaving designated park, county, private, and/or state roads for all four management zones. Given the zero-tolerance nature of these thresholds, the unit of measure is inconsequential. A threshold of zero new roads has the same effect as a threshold of zero miles of new roads. Information on the area of disturbance (i.e., miles of new roads) may be collected, as this data may be used in court proceedings as individuals cited for this activity are charged or ticketed. However, the indicator of number of undesignated roads maintains a simple and easily monitored metric.

## Other/New Elements

### *NPS response to other/new elements comments:*

1. Some commenters noted that the plan should **include more loop trails** because visitors prefer not to retrace their path and because this would reduce traffic on trails. One commenter suggested that the park should consider designating a hiking trail that follows the entire course of both rivers at the park.

In response, the park offers both linear and loop trails, some which follow extended segments of the riparian corridors that afford views of both the Current and Jacks Fork Rivers. Currently, adding a trail section running the length of the rivers is not within the scope of the RTMP. Often, for this action to be successful, the National Park Service must partner with cooperating landowners adjacent to NPS land. The National Park Service understands that maintaining good relations with adjacent landowners, surrounding communities, and private and public groups is important for parks to be successful. Trail access across private lands outside park boundaries are at each individual landowner's discretion. As part of the trail management plan, the National Park Service would collaborate with landowners, interested citizens, and trail stakeholders to explore opportunities for the proposed additional 10 miles of trails outside the park boundaries that would connect to designated park trails. Only where it is in the mutual interest of the park and adjacent landowners would the National Park Service secure authorized and/or permitted access for such trails.

*NPS Management Policies 2006* emphasizes consultation and cooperation with local, state, tribal, and federal entities (section 5.2.1) and calls for cooperative conservation beyond park unit boundaries (section 1.6) and for cooperative planning (section 2.3.1.8). Director's Order 75A: *Civic Engagement and Public Involvement* provides further guidance on this matter.

2. A few commenters suggested that **certain areas should be designated for access from the river only**.

In response, the scope of the RTMP/EA does not include areas for access for the river only. A future river management plan could include this topic.

3. Commenters provided additional concerns about the plan's **protection of springs and scenic easements**. For example, one commenter suggested the plan should protect the 4,500-acre Big Spring area south of Van Buren from motorized use. Another commenter suggested that the plan should protect scenic easements on public and private lands within the park boundaries.

In response, resource protection of rivers and springs is incorporated into the RTMP/EA through the analysis provided in Chapter 3 Affected Environment. Additionally, water quality has been added to the RTMP/EA. Mitigation measures stated in appendix G of the RTMP/EA outline steps the National Park Service would take to protect rivers and springs from the proposed actions under the selected alternative. A future river management plan would also incorporate the protection of rivers and springs.

4. Several commenters indicated that **horse manure from equestrian activities is likely to spread invasive plants.**

In response, park managers have been working to minimize horse manure impacts on the natural environment, as well as on the visitor experience of those expressing displeasure with horse droppings on park trails. One potential solution—providing or mandating weed-free hay—is not currently a viable management option. Section 3.3.1 of the RTMP/EA indicates that motorized vehicles can also spread invasive plants throughout the park unit by transporting weed seeds on vehicle tires. The National Park Service would implement weed mitigation measures included in appendix G of the RTMP/EA and continue parkwide invasive plant control protocols. Examples include revegetating disturbed soils with native species seed mixes that do not include invasive or nonnative species and thoroughly pressure washing equipment to ensure that all equipment and machinery are clean and weed-free before being brought into the project area.

5. Several commenters suggested that the plan does not adequately address **closure and removal of illegally created trails and enforcement of existing regulations at the park.** Some also suggested the National Park Service should partner with agencies like the Missouri Department of Conservation and Back Country Horsemen of America or Missouri to help maintain designated and unauthorized trails instead of closing them.

In response, the RTMP/EA, Chapter 2 Alternatives, 2.4.2 Balancing New Trails with Rehabilitation of Existing Designated Trails and Restoration of Undesignated Trails, describes a funding strategy for rehabilitation, construction, and maintenance of roads and trails, including partnerships. The initiation and sequencing of trail and restoration projects would proceed according to available funding, resources (e.g., equipment, trail crews), and the availability of user groups and organizations to partner/assist with trail development and restoration efforts. The restoration of unauthorized trails would be prioritized, which includes trails illegally created on NPS lands.

6. Commenters suggested that existing **trails should be more clearly marked with signs.** Suggestions also included closing trails when conditions are too wet, eroded, or unsafe. Similar comments highlighted conservation benefits from more visitors learning and practicing Leave No Trace principles.

In response, the RTMP/EA, Appendix G: Mitigation Measures and Best Management Practices, describes methods the National Park Service would follow for specific situations. The National Park Service recognizes the need for increased signage to reduce confusion related to designated and undesignated trails. Designated roads, trails, river crossings, and recreation areas would be clearly and consistently signed for visitors on maps, on the ground, and in park informational materials to assist visitors with trip planning and reassure visitors that they are on a designated facility. These signs would display commonly used symbols and icons based on widely accepted sign standards. Vehicular travel will be limited to designated and signed roads only.

7. Similarly, periods of heavy or sustained precipitation often lead to flooding, saturated soils, and **muddy conditions along park trails**. Use of park trails during these periods can lead to rutting, trenching, braiding, social trail creation, and widening of tread. The inundation of some areas with water during flooding also presents serious threats to visitor safety. During or after periods of heavy precipitation, the park would implement temporary closures on a case-by-case basis to protect trails, improve visitor safety, and reduce negative resource impacts.
8. **Visitor education and interpretation** would continue as follows: seasonal roving interpretation by river rangers; updates to online information for interpretation and education; and use of all available information tools, such as social media, to provide up-to-date messaging about visitor opportunities, use patterns, congestion, and appropriate times to access popular areas. Additional visitor education will be provided through the permit system for equine and ATV/UTV use. Education is the most important management tool to ensure the safety of all visitors on NPS roads and is the top priority. Further, analysis of supply and demand (i.e., site characteristics that facilitate appropriate ATV and UTV use), monitoring use levels and indicators, and enforcement of the regulations would ensure accountability for all NPS road users. The visitor capacity could be adjusted in the future if monitoring indicates that it is appropriate given conditions.

## **Water Quality and Socioeconomics**

### *NPS response to water quality and socioeconomics comments:*

1. Many commenters suggested **that several topics should be analyzed more fully in the EA, including water quality and socioeconomics**. Some commenters suggested that water quality should have a detailed analysis in the EA. Commenters noted that equestrian users and ATV stream crossings adversely impact water quality. Some commenters also suggested that the EA improperly dismissed water quality from a detailed analysis.

Concerns raised about horse crossings and related contamination from droppings and sedimentation is addressed in section 3.6.4 of the EA: “Adverse impacts on listed species and their habitats from development of the crossings would be limited to minor, short-term erosion and sedimentation impacts on streams and hellbender habitat. Creation of new crossings would also have beneficial effects on hellbenders by directing use away from dozens of informal, unauthorized crossings.”

In response, the National Park Service has added water quality as an impact topic for environmental analysis in the RTMP/EA.

In response to concerns about potential socioeconomic impacts of implementing the selected alternative, the plan would likely have minimal impacts on the socioeconomic conditions in the local region. Section 1.2.6 Community Objectives of the RTMP/EA indicates that the park’s network of roads, trails, and recreation facilities would reflect the importance of the Current and Jacks Fork Rivers to communities and the surrounding region, both in terms of economy and lifeways. While proposed management actions would

restrict some existing recreational activities, these restrictions are expected to have only marginal impacts on visitation.

As stated in the RTMP/EA, 3.9.3 Environmental Consequences of Alternative B, the potential exists for a slight decrease in horseback riding visitation and slight reductions in visitor spending, regional economic benefits, and fiscal receipts compared to the no-action alternative. However, expanded formal access for horseback riding in the Upper Current River and new hiking and biking trails may increase visitation associated with these activities, resulting in increases in visitor spending, regional economic benefits, and fiscal receipts. Additional commercial use opportunities may occur. Additionally, the RTMP/EA states that construction activities associated with new trail development, trail and road closures, restoration work, and new parking lots and facilities would provide opportunities for construction jobs and income, with beneficial impacts on regional economic conditions.

The National Park Service acknowledges concerns raised regarding closing trails during new trail construction and associated economic impacts. As stated in the RTMP/EA, Appendix G, Section Trail Management, flooding, storm damage, and use levels may require modifications to the trail maintenance schedule. An implementation strategy in the plan would prioritize trail and road restoration, maintenance, rehabilitation, and development. This strategy could include redirecting use to other areas where the use is appropriate or previously designated and temporary closures until archeological surveys, trail maintenance, and restoration is completed, thereby likely maintaining visitor spending in local areas and equestrian campgrounds.

## **Threatened and Endangered Species**

### *NPS response to threatened and endangered species comments:*

1. Some commenters requested additional clarification on **how plan actions and best resource management practices under the selected alternative would be implemented to avoid impacts on federally listed species**. Chapter 3 of the RTMP/EA, Section 3.6 of the Selected Alternative, Federally Listed Threatened and Endangered Species, addressed the impacts to these species from actions proposed under the selected alternative. Most listed species would not be affected by the proposals in any alternatives. The implementation of the selected alternative on bats and hellbenders may affect, but are not likely to adversely affect, either of these species.

Regarding federally listed bat species, commenters noted that gating all caves near roads or trails could have adverse effects on bats using the caves because different types of bats require different types of gates.

In response, in the RTMP/EA, Appendix G: Mitigation Measures and Best Management Practices, Caves section, the National Park Service would gate off access to any caves proximate to trails to prevent human disturbance, as needed.

Regarding potential impacts of nonnative trout, which are noted as a threat to federally listed Ozark hellbenders, commenters indicated the RTMP/EA should include an analysis of

cumulative impacts on Ozark hellbenders and threatened and endangered bat species. Sedimentation and degraded water quality from multiple sources outside park boundaries are additional threats to the Ozark hellbenders, commenters noted.

In response, the National Park Service and the USFWS have an affirmative responsibility to implement plans and strategies to protect and manage the endangered Ozark hellbender under the terms of the Endangered Species Act. Combined with the high quality of the Current River watershed, the park continues to provide an important center for conservation of the ecological systems and processes that are unique to the Ozark Plateau and that contribute to the park's high biological diversity.

As noted in Chapter 3, Affected Environment, section 3.5.1 of the RTMP/EA, "Rainbow and brown trout, nonnative species to Missouri, are present in the Upper Current River and are periodically stocked by the Missouri Department of Conservation (MDC)." Although the National Park Service is responsible for managing fisheries and other aquatic resources and providing fishing opportunities in the park, the Missouri Department of Conservation sets, administers, and enforces fishing regulations in the park. Therefore, modifying the content or enforcement of fish stocking is beyond the scope of the RTMP/EA. However, the effects of nonnative game fish stocking and timing/locations of fishing activities will be considered in the future conservation plans and management actions. For example, the effects of nonnative fish stocking on Ozark hellbender habitat will be analyzed when the National Park Service works with the USFWS to develop a hellbender conservation plan, fulfilling the intent of Section 7(a)(1) of the Endangered Species Act.

As noted in the RTMP/EA and this FONSI, the selected alternative would reduce unauthorized horse crossings, which would have beneficial impacts on managing visitor access to gravel bars and have a positive, indirect effect on federally listed species habitat. With additional miles of trails added, the endangered Ozark hellbender would likely experience short-term erosion and sedimentation impacts on its waterways habitat, although impacts from trail development are not expected to exceed a small level of overall effect to this species.

## **Adequacy of the NEPA analysis**

### ***NPS response to purpose and need planning process and policy comments:***

1. Some commenters questioned the National Park Service's **ability to administer current management policies and actions** and are skeptical that the National Park Service could implement the plan's action alternatives.

Regardless of the alternative selected for implementation in the RTMP, the park will continue to implement guidance and planning actions—to the best of its ability—from its 2014 General Management Plan. Among several functions that ongoing implementation of the general management plan achieves, the park would continue to meet statutory requirements in 54 *United States Code* (USC) 100502 that address measures for preservation of resources, types and general intensities of development, and the identification of visitor carrying capacities. Accordingly, the purpose of implementing the selected alternative in the

RTMP/EA is to improve the system of park roads and trails to ensure that it provides access to a variety of locations and experiences while also protecting the park's fundamental resources and values.

As the RTMP/EA indicates, a plan is needed to ensure that designated<sup>14</sup> roads and trails and associated public recreation areas are clearly documented going forward and that undesignated<sup>15</sup> roads and trails are properly restored<sup>16</sup> to protect the park's natural and cultural resources and improve visitor safety. Use of undesignated, visitor-created roads and trails have led to resource concerns and safety issues for visitors, including longer response times for law enforcement personnel and more complex search and rescue operations. Restoring redundant and undesignated roads would improve visitor experience, visitor safety, and resource conditions; provide cost savings; and allow more investment in designated visitor facilities throughout the park.

2. One commenter suggested that an **environmental impact statement (EIS)** should be prepared for the project. Other commenters questioned why **water quality** was dismissed from full analysis.

In response, the National Park Service determined that, after preparing the RTMP/EA, the proposed action does not require the preparation of an EIS. The National Park Service prepared a finding of no significant impact, which details why the action will not have a significant effect on the human environment (see questions 1–10 in the decision document—specifically responses to question 1, 3, 6, 8 and 9). In response to dismissing water quality from the full analysis, the impact topic was added to the RTMP/EA for detailed analysis.

In addition, the selected alternative includes mitigation measures to avoid impacts to resources and minimize adverse effects on natural and cultural resources in the park (Chapter 3 Affected Environment of the RTMP/EA): vegetation and soils; fish and wildlife; water quality; threatened and endangered species; archeological resources; and historic buildings, sites and cultural landscapes. Avoidance, minimization, and mitigation measures and best management practices would prevent or minimize potential adverse effects associated with the implementation of the alternatives (Appendix G: Mitigation Measures and Best Management Practices of the RTMP/EA). Past and ongoing monitoring would inform future mitigation measures to avoid impacts on the park's cultural and natural resources and visitor experience; future monitoring would do the same (Appendix G: Mitigation Measures and Best Management Practices of the RTMP/EA). For example, management strategies included in the RTMP/EA are designed to avoid water crossing

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<sup>14</sup> Designated roads include roads within the park that have been authorized by the National Park Service through a formal planning process and which are designed, constructed, and maintained by the National Park Service in accordance with NPS road standards.

<sup>15</sup> Unauthorized, visitor-created trails that are not part of the official road and trail system.

<sup>16</sup> Additional information on restoration is provided in chapter 2 and "Appendix G: Mitigation Measures and Best Management Practices" of the RTMP/EA.

locations that could add contaminants to habitat and affect wildlife species that are sensitive to water quality conditions, such as the Ozark hellbender.

3. One commenter suggested that the EA should **include an analysis of cumulative impacts**.

In response, Section 3.1 Cumulative Impacts Analysis Methodology of the RTMP/EA states that cumulative impacts were analyzed by combining the impacts of the alternatives included in this document with the impacts of other past, present, and reasonably foreseeable future actions. These identified actions comprise the cumulative impact scenario. See table 2 (NPS Past, Present, and Reasonably Foreseeable Actions) and table 3 (Non-NPS Actions) for more information on cumulative impacts. Unfunded and unapproved conceptual plans that broadly focus on long-term goals and objectives have not been included in the cumulative impact scenarios. The geographic scope of the analysis includes actions in the project area as well as other actions in the park or surrounding lands and adjoining counties where overlapping resource impacts are possible. The geographic extent generally includes the entire park and possibly some of the immediate surrounding area.

Additionally, for all impact topics retained for analysis, the organizational structure of Chapter Three Affected Environment of the RTMP/EA includes a section titled “cumulative impacts” for each impact topic before the “conclusion” section.

4. Several commenters said that the purpose and need for the project improperly **favor access for recreation over the protection of resources** and that the **difference between alternatives B and C are minimal**.

In response, Section 1.1 Purpose and Need of the RTMP/EA states that the purpose is to improve the system of park roads and trails to ensure that it provides access to a variety of locations and experiences while protecting the park’s fundamental resources and values. In addition to the purpose of conservation, interpretation, and preservation, the park’s enabling legislation also includes “provisions for use and enjoyment of the outdoor recreation resources thereof by the people...”

Objectives for the RTMP/EA were outlined early in the planning process. The selected alternative meets all the stated objectives: design and locate roads, trails, river access points, and river crossings to minimize adverse impacts on important water quality, vegetation and wildlife communities; make use of existing disturbed areas; help restore heavily impacted and environmentally sensitive areas and direct trail use to other designated trails or new trails having more suitable soils; promote appropriate types and levels of visitor use associated with roads and trails; avoid and/or protect cultural resources that are important and integral to understanding the human history of the area, including sensitive archeological and ethnographic resources, cultural landscapes, precontact or historic structures, and ethnographic resources; and provide clearly defined access to a variety of opportunities and locations in the park with minimal duplication. Appropriate access would facilitate education and interaction with natural resources as well as cultural landscapes and historic sites.

The differences between what is proposed in the two action alternatives goes beyond the miles for roads and trails, as outlined in chapter 2 of the RTMP/EA, Table 2.5 Summary of Key Alternative Elements. Additional differences include mileage for biking, horse trail river crossings, and designated recreation areas along the river. A number of lesser impacts would occur with the selected alternative. The environmental consequences are fully described in chapter 3 of the RTMP/EA, Affected Environment for proposed alternatives. For example, visitor use and experience is also considered when comparing action alternatives.

Alternative C provides the most trail mileage and therefore, more beneficial impacts for hikers, bicyclists, and equestrian riders. Further, increased trail connectivity throughout the park would have beneficial impacts on visitor use and experience, including the connection to the Ozark Trail. With the number of river crossings in alternative C, additional adverse impacts could affect water-based recreation and increase user conflicts on multiuse trails. Short-term adverse impacts may also potentially affect permitting equestrian, UTV, and ATV use.

5. Some commenters suggested that the purpose and need for the plan should **improve the park system of roads and trails instead of limiting access.**

In response, section 1.1 of the RTMP/EA, Purpose and Need, states that the purpose of the plan is to improve the system of park roads and trails to ensure that it provides access to a variety of locations and experiences, while also protecting the park's fundamental resources and values. At first glance, the RTMP/EA may appear to be limiting access. However, undesignated roads and 14 miles of duplicative, NPS-administered roads would be closed and properly restored to protect park's natural and cultural resources and improve visitor safety. The selected alternative expands visitor access and experiences to include 49.5 miles of new trails (7.5 outside jurisdictional boundary), new bike trails, additional horse crossings, and more, all the while balancing resource protection.

The National Park Service recognizes that Jacks Fork and Current Rivers are designated as Outstanding National Resource Waters because of their exceptional water quality. Many of the proposed actions under the selected alternative are aimed at managing visitor use and would ultimately benefit the water quality by reducing potential erosion and sedimentation impacts by visitors (through closure and rehabilitation of unauthorized river crossings). A future river management plan may address public concerns that are not within the scope of the RTMP/EA.

## ATTACHMENT B: DETERMINATION OF NON-IMPAIRMENT

### The Prohibition on Impairment of Park Resources and Values

Section 1.4.4 of NPS *Management Policies 2006* explains the prohibition on impairment of park resources and values: “While Congress has given the Service management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the 1916 Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them. The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by the legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.”

### What is Impairment?

Section 1.4.5 of NPS *Management Policies 2006*, What Constitutes Impairment of Park Resources and Values, and section 1.4.6 What Constitutes Park Resources and Values, provide an explanation of impairment. “Impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values.” Section 1.4.5 of NPS *Management Policies 2006* states:

“An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified as a goal in the park’s general management plan or other relevant NPS planning documents as being of significance.”

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. An impact that may lead to impairment could result from NPS activities in managing the park or visitor activities or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.

Per section 1.4.6 of NPS *Management Policies 2006*, park resources and values at risk for being impaired include:

- “the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.”

### **Impairment Determination for the Selected Alternative**

Based on the evaluation of potential impacts identified in the EA, the topics evaluated for impairment include the following:

**Visitor Use and Experience.** The increase of overall trail mileage and diversity of visitor opportunities will positively impact visitor use and experience. Horseback riders will at first need to adjust to the new permitting system, but this adverse impact is reduced by the positive effect of the permitting system reducing congestion on the trails. The removal of undesignated horse trail river crossings will reduce visitor confusion, resulting in a long-term benefit to visitor use and experience. The increase of designated horse trail river crossings will positively benefit horse trail users and adversely impact river users. Visitor use management strategies for indicators, thresholds, and visitor capacity will help reduce crowding at popular areas and enhance visitors' overall experience. Impacts to visitor use and experience under the selected alternative will not cause impairment.

**Vegetation and Soils.** Restoring unsuitable designated roads and all undesignated roads will result in long-term benefits to vegetation and soils. The addition of new trails would have a small, long-term adverse impact on vegetation and soils, and the restoration of non-designated trails will result in a long-term benefit to vegetation and soils. Additional horse trail river crossings under the selected alternative will have a small adverse impact on vegetation and soils, but this impact would be localized and negligible in the context of the entire park. Restoring a subset of the designated recreation areas will result in a benefit to vegetation and soils. Impacts on vegetation and soils under the selected alternative will not cause impairment.

**Fish and Wildlife.** Restoring roads and trails to natural conditions will result in long-term benefits to fish and wildlife. Increasing trail mileage will result in adverse impacts to fish and

wildlife, but the new trails will be aligned to avoid impacts on sensitive resources. Equestrian permitting and managing visitor access to gravel bars will result in a benefit to fish and wildlife. Introducing bicycling and additional horse trail river crossings will have a small adverse impact on fish and wildlife. Impacts to fish and wildlife under the selected alternative will not cause impairment.

**Threatened, Endangered, and Sensitive Species.** Restoring roads and trails to natural conditions will result in long-term benefits to threatened, endangered, and sensitive species. Increasing trail mileage will result in adverse impacts to threatened, endangered, and sensitive species. Equestrian permitting and managing visitor access to gravel bars will result in a benefit to threatened, endangered, and sensitive species. Introducing bicycling and additional horse trail river crossings will have a small adverse impact on threatened, endangered, and sensitive species. Impacts to threatened, endangered, and sensitive species under the selected alternative will not cause impairment.

**Archeological Resources.** The increase of overall trail mileage, new horse staging areas, parking areas, and trailheads will result in a small adverse impact on archeological resources. These sites would be avoided in new development to reduce adverse impacts. Equestrian permitting, restoring roads and trails, and managing visitor access to gravel bars will result in a benefit to archeological resources. Impacts to archeological resources under the selected alternative will not cause impairment.

**Cultural Landscapes, Historic Sites, and Structures.** The increase of overall trail mileage will result in a small adverse impact on historic buildings, sites, and cultural landscapes. These resources would be avoided in new trail development to reduce adverse impacts. Equestrian permitting, restoring roads and trails, and managing visitor access to gravel bars will result in a benefit to cultural landscapes, historic sites, and structures. Impacts to cultural landscapes, historic sites, and structures under the selected alternative will not cause impairment.

**Socioeconomics.** The expansion of visitor opportunities through increased trail mileage will result in a benefit to socioeconomics and the regional economy. Road closures will affect local populations but will not affect nonlocal populations of visitors. Equestrian permitting may deter some users from recreating, and commercial use providers may have to adjust to the permit requirements. Construction activities associated with the selected alternative will provide opportunities for more jobs, resulting in a benefit to the regional economy. Impacts to socioeconomics under the selected alternative will not cause impairment.

**Water Quality.** Short-term impacts of erosion and sedimentation on streams will be reduced by adhering to the mitigation measures and best practices outlined in appendix G of the RTMP/EA. Long-term impacts of erosion and sedimentation will be reduced by actions outlined in the preferred alternative, including restoration of undesignated roads and trails, formalizing the park's system of roads, trails, and river access points, clarifying allowable uses on roads and trails, and determining appropriate levels of effort needed to maintain the transportation network.

## **Summary**

As described above, adverse effects and environmental impacts anticipated as a result of implementing the selected alternative for a resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified as significant in the park, general management plan, or other relevant NPS planning documents, will not rise to levels that will constitute impairment of park values and resources in the park.

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