

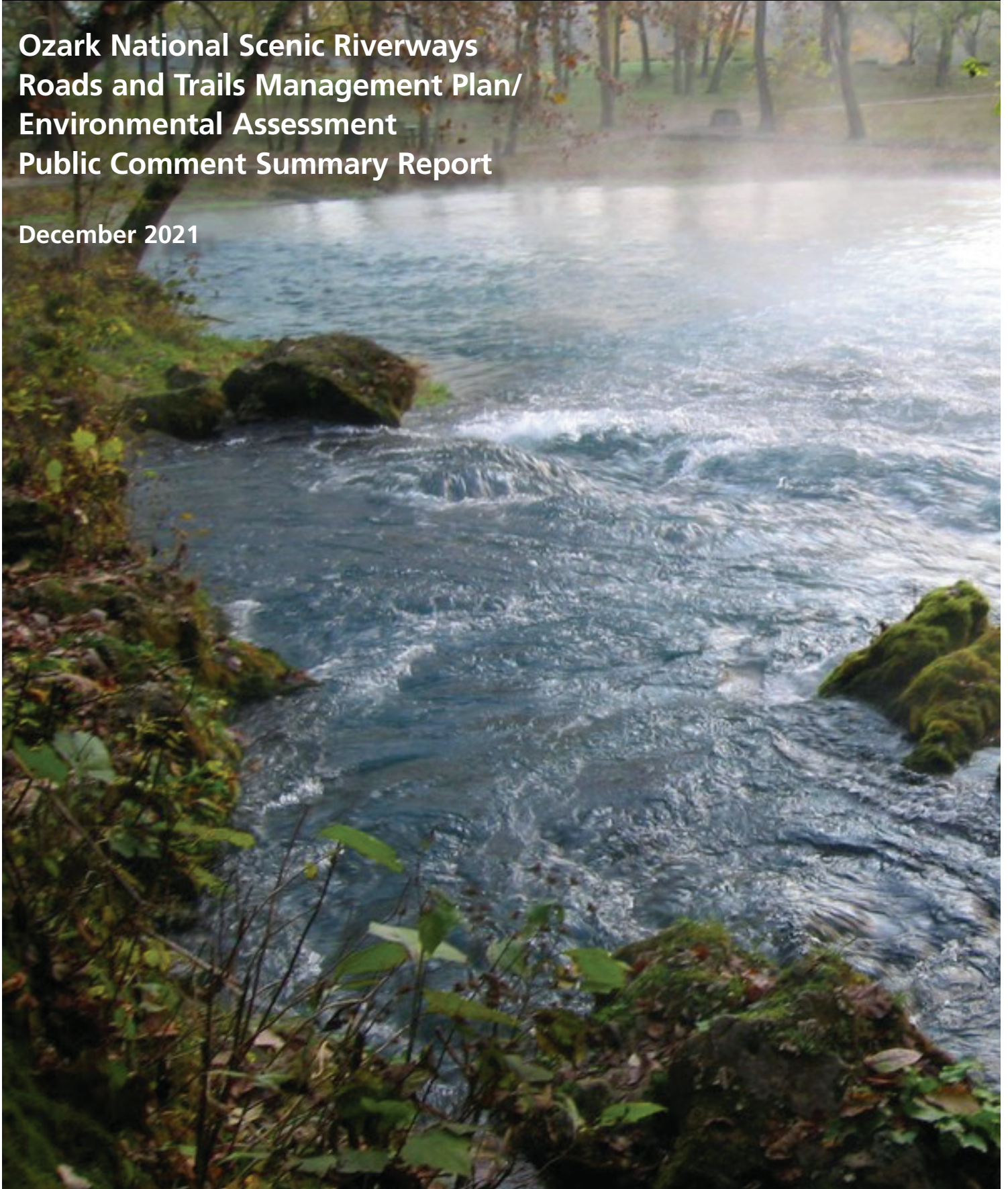
National Park Service
U.S. Department of the Interior

Ozark National Scenic Riverways
Missouri



Ozark National Scenic Riverways Roads and Trails Management Plan/ Environmental Assessment Public Comment Summary Report

December 2021



**Ozark National Scenic Riverways
Roads and Trails Management Plan/
Environmental Assessment
Public Comment Summary Report**

Prepared for—

National Park Service

Prepared by—

ERO Resources Corporation
1842 Clarkson Street
Denver, CO 80218
(303) 830-1188

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OZARK NATIONAL SCENIC RIVERWAYS ROADS AND TRAILS MANAGEMENT PLAN/ENVIRONMENTAL ASSESSMENT PUBLIC COMMENT SUMMARY REPORT

INTRODUCTION

The National Park Service (NPS) is considering a range of alternatives and management actions as part of the Roads and Trails Management Plan (Roads and Trails Plan) for Ozark National Scenic Riverways (ONSR or park). The NPS prepared a Draft Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) and released it for public review on June 18, 2021. At the conclusion of this EA and the decision-making process, one of the alternatives, or a combination of actions from multiple alternatives, will become the long-term Roads and Trails Plan.

PUBLIC REVIEW PROCESS

Public comments on the EA were invited beginning on June 18, 2021. After receiving several extension requests, the NPS extended the comment period to August 18, 2021. During the review period, 1,453 comment correspondences (1,005 unique correspondences and 448 form letters) were submitted to the NPS. From each correspondence, comments were extracted and coded into categories (see *Comments Overview* below). Any additional public correspondences received outside of the review period will be included in the Decision File.

Public notices of the comment period and meeting were distributed through the following sources:

- An EA availability announcement posted to the NPS's Planning, Environment, and Public Comment (PEPC) website:
<https://parkplanning.nps.gov/projectHome.cfm?projectId=113284>
- A news release sent electronically (via email) to various stakeholders, agencies, and media groups announcing the initial 30-day comment period
- A news release sent electronically (via email) to various stakeholders, agencies and media groups announcing a one-month extension to the comment period.
- Emailed news release to all country, state, and federal elected officials, as well as the mayors and Chambers of Commerce for local communities.
- News releases posted on the park's social media accounts (Facebook and Twitter)
- Letters sent to affiliated tribes:
 - Absentee-Shawnee Tribe of Indians of Oklahoma
 - Cherokee Nation
 - Delaware Nation

- Delaware Tribe of Indians
- Eastern Shawnee Tribe of Oklahoma
- Osage Nation
- Shawnee Tribe
- United Keetoowah Band of Cherokee Indians in Oklahoma
- Letter to the Missouri State Historic Preservation Officer

PUBLIC COMMENTS

Correspondences

During the public comment period, the NPS received 1,453 correspondences. Of these, 1,030 were submitted through the PEPC website. A total of 448 form letters were received, which included variations of 15 master form letters. This total includes 180 variants of a form letter generated by the Sierra Club and an additional 226 identical form letters generated by the Sierra Club. One correspondence was a petition with 841 signatures. The remaining correspondences were unique letters submitted by individuals and organizations (Table 1).

Table 1. Summary of Correspondences

Correspondence Type	Number of Correspondences
Web Form (PEPC)	1,030
Other	
• Identical form letter – Sierra Club	226
• Variant of form letter – Sierra Club	180
• Letter or email	16
• Petition	1
Total	1,453

Most correspondences were from residents of Missouri and nearby states. The state distribution is shown in Table 2.

Table 2. Correspondence Distribution by State

State	Percentage	Number of Correspondences
Missouri	81.6	1,002
Illinois	5.3	65
Iowa	2.0	25
Arkansas	2.0	24
Kansas	1.4	17
Other (28 states and the District of Columbia)	7.7	95
Total	100.0	1,228*

*The 226 identical form letters are only counted once in this total. These form letters were mostly also from Missouri residents.

The following organizations submitted correspondences:

- Arkansas Back Country Horsemen
- Back County Horsemen of America
- Broke n Busted Saddle Club
- Burroughs Audubon Society of Greater Kansas City
- Capital City Flyfishers
- Cave Research Foundation
- Columbia Audubon Society
- Conservation Federation of Missouri
- Dent County Historical Society
- Douglas County Saddle Club
- East Ozarks Audubon Society
- Friends of Ozark Riverways
- Greenwood Forest Association
- Illinois State Stock Horse Association
- L-A-D Foundation
- Missouri Back County Horsemen
- Missouri Coalition for the Environment
- Missouri Parks Association
- National Parks Conservation Association
- Ohio Horsemen's Council
- Osage Group of the Sierra Club
- Ozark Ridge Riders Saddle Club
- Ozark Riverways Foundation
- Ozark Society
- Salem Area Chamber of Commerce

- Schoolcraft Chapter Ozark Society
- Sierra Club
- Sierra Club Missouri Chapter
- St. Louis Audubon Society
- Stream Teams United
- The Nature Conservancy
- Tornado Ridge Chapter of Back Country Horsemen
- Trout Unlimited

The following government agencies or officials submitted correspondences:

- Congressman Jason Smith, U.S. House of Representatives
- Missouri Department of Conservation
- Missouri State Historic Preservation Officer

The following Native American tribes submitted correspondences:

- Cherokee Nation

COMMENTS OVERVIEW

In total, 2,142 comments were extracted and coded into categories from the unique correspondences, 15 master form letters, and unique portions of form letter variants. A summary of public responses to the question prompts are provided below. A more detailed breakdown of comment themes is also provided below. The comment summary is organized into the following topics:

- Alternatives
 - Alternative A (General Support/General Opposition)
 - Alternative B (General Support/General Opposition)
 - Alternative C (General Support/General Opposition)
- Alternative Elements
 - Equine Use
 - Mountain Biking
 - Hiking

- River Use/Crossings
- Roads
- Trailheads and Parking
- All-Terrain Vehicles and Utility Terrain Vehicles (ATVs and UTVs)
- Permits and Fees
- Commercial Use
- Other/New Elements
- Trail Access to Specific Area
- Indicators, Thresholds, Monitoring, and Visitor Capacity
- Alternative Maps
- Illegal Use and Enforcement
- Issues
 - Water Quality
 - Socioeconomic Impacts
 - Erosion
 - Fish
 - Threatened and Endangered Species
 - Vegetation
- Purpose and Need
- Planning Process and Policy

COMMENT SUMMARY

The NPS is required to respond to substantive comments submitted during the public review period for draft environmental impact statements (EISs) (1503.4). For EAs, the NPS must consider all comments that are timely received, and the standard NPS practice is to respond to substantive comments (as defined in the 2015 NPS NEPA Handbook) that are submitted during the public review period (43 Code of Federal Regulations (CFR) 46.305(a)(1)).

Substantive comments are those that

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or
- cause changes or revisions in the proposal.

In other words, substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response. Comments in this report are not labeled as substantive or nonsubstantive but are simply representative of the categories and range of comments received during the review period. National Park Service responses to substantive comments are included in the “Response to Comments and Issues” section of the Finding of No Significant Impact, found at [Parkplanning – Ozark Roads and Trails Management Plan](https://parkplanning.nps.gov/projectHome.cfm?projectID=56591) (<https://parkplanning.nps.gov/projectHome.cfm?projectID=56591>).

The comment summary below was developed to summarize the nature and content of public comments.

Alternatives

Alternative A

Commenters who supported Alternative A mentioned fewer restrictions on access, continuation of current management, and reduced maintenance costs as benefits of this alternative. Some commenters who supported Alternative A expressed a desire to see undesignated roads and trails closed, while others appeared to believe that existing undesignated roads and trails would continue to be open under Alternative A.

Commenters who opposed Alternative A expressed concern about closure of existing trails under this alternative, while others stated that Alternative A does not go far enough in limiting access. Other commenters stated that Alternative A would adversely affect horse camps or would be expensive to manage.

Alternative B

Commenters who supported Alternative B mentioned protection of natural resources, development of new hiking and biking trails, additional horse crossings, limiting access to ATV/UTVs, closing and restoring undesignated trails, and reducing equestrian overuse as benefits of this alternative. Some commenters noted that Alternative B balances the needs for resource protection and recreational use.

Commenters who opposed Alternative B cited reduced access for equestrians and increased maintenance costs. Several commenters also suggested that Alternative B should contain 25 to 45 miles of equestrian trails, as provided in the 2014 General Management Plan.

Alternative C

Many commenters who supported Alternative C identified themselves as equestrians and stated that Alternative C was preferred because it has more trails and is perceived as more beneficial to equestrians. Some commenters supporting Alternative C stated that current undesignated trails should be kept open, and trails should not be closed while new trails are constructed. Some supporters of Alternative C stated that it should include more trails and more facilities for equestrians.

Commenters who opposed Alternative C mentioned opposition to allowing mountain bikes on the Ozark Trail, increased maintenance costs, and opposition to new designated equestrian trails.

General Support or Opposition to Action

In addition to support or opposition to a specific alternative, members of the public offered several position statements (i.e., general support or opposition to an action). Comments in this category often included statements urging NPS to protect the rivers, not close the trails or other general statements of support or opposition to an action. Commenters in this category generally expressed a desire for undesignated trails to remain open or, alternatively, expressed general support for an action to protect ONSR and its resources.

Alternative Elements

Equine Use

Different user groups generally had opposing comments regarding equine use (i.e., equestrians typically wanted more trails and fewer restrictions on equestrian use, while other commenters wanted more restrictions on equestrians). Many commenters suggested that the NPS consider keeping or designating existing undesignated equestrian trails or constructing additional trails at ONSR. Commenters stated that many of these trails predate the creation of the park. Commenters also stated that removing trails would result in overcrowding on the remaining trails. Some commenters mentioned that closing trails would force equestrians onto roads shared with motor vehicles, resulting in unsafe conditions. Some commenters stated that they would go elsewhere to ride if equestrian access is reduced at ONSR. Several commenters suggested that ONSR should have more trails for equestrian use. One commenter suggested that the NPS create a new alternative that provides more equestrian trails.

Additional concerns related to equine use included:

- Hiking, equestrian use, and ATV use are not compatible on the same trail and separate trails should be designated for these uses. These comments cited safety concerns from other users startling horses, risks to hikers from walking on trails damaged by horses, and aesthetic issues with hikers or other users encountering horse manure on the trail.
- The Roads and Trails Plan should include additional trails as proposed in the 2014 General Management Plan (GMP). Commenters specifically cited that the GMP included an additional 25 to 45 miles of equestrian trails at ONSR.
- The NPS should consider reducing or eliminating equestrian use in the park. Commenters noted observations of horses defecating in waterways and general adverse impacts on natural resources and trails.
- Some visitors are not physically able to experience ONSR by hiking, so equestrian access should continue to be allowed on existing trails.
- The Roads and Trails Plan should limit the size of equestrian groups to no more than 10 horses and create a permitting system.
- The NPS should not add more horse trails until they are able to manage the current volume of equestrian use and ensure equestrians are not violating the rules and damaging resources.
- The Roads and Trails Plan should not include a new horse staging area at Cedar Grove until there is stronger enforcement throughout the upper Current River Conservation Area.
- Equestrian trails should not be designated in fragile riparian areas.
- Access to historic sites should be on foot only. These commenters suggested that hitching racks could be placed a distance away from these sites so equestrian users would travel to these sites on foot only.
- The Roads and Trails 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.
- The horse trail north and east of Maggard Cabin is unnecessary and will cause resource damage.

Mountain Biking

Some commenters expressed support for bicycle use in ONSR, while others were opposed to allowing bicycles. In addition to statements of support or opposition, specific concerns related to mountain biking included:

- Bicycles should be allowed on roads at ONSR but not on trails.
- The Roads and Trails Plan should designate separate trails for mountain bike and equestrian use. One commenter expressed concerns that horse trails are too deeply rutted to be used for biking.
- Old Tram Road should be designated as a bike trail; however, commenters questioned whether the trail would remain open to motorized travel.
- Mountain bikers should be allowed to bike the Ozark Trail end-to-end but noted that this is not currently possible because bikes are prohibited in ONSR.
- Trails designated for bicycles should be redesigned before bikes are allowed on them, otherwise trails will be damaged because they were designed for hiking.
- The Pulltite Nature Trail is not an appropriate trail for mountain bikes and should not be opened to mountain biking. One commenter stated concerns including use of the trail by families with children, the narrowness of the trail, and impacts on the nearby campground. Another commenter suggested that the NPS consider allowing mountain biking on the Round Spring Spur of the Ozark Trail before changing use of the Pulltite Nature Trail.
- Erosion caused by mountain biking would adversely impact karst resources. The commenter specifically mentioned potential impacts on McDonald Cave and Pulltite Spring.
- The NPS should establish guidelines for how they plan to address e-bikes on trails. The commenter stated that there are multiple classes of e-bikes, which may result in greater impacts on trails compared to hiking.

Hiking

Many commenters supported designating additional hiking trails at ONSR. Commenters supported the proposed designation of new segments of the Ozark Trail and suggested a general increase in designated hiking trails in the park. Comments also supported increased signage on hiking trails, increased partnerships with other land management agencies to develop trails, and stated that additional hiking trails were needed to address increased use. Additional concerns related to hiking included:

- The Roads and Trails Plan should keep all existing hiking trails open to the public. These commenters opposed closing undesignated trails that are used for hiking.

- The NPS should consider designating a hiking trail that follows the entire course of both rivers at ONSR.
- The trails from Susie Nichols Cabin to Schaefer Springs and from Round Spring Spur south to the Jerktail Loop Trail should be for hikers only, and not open to equestrian use.
- The trail layout shown for the Jacks Fork Natural Area is not viable.

River Use/Crossings

Comments related to river use and crossings mostly focused on equestrian river crossings. Many commenters suggested that the number of horse crossings or motorized crossings should be reduced. Commenters suggesting that horse crossings be eliminated or reduced often expressed concerns about the illegality of undesignated trails and crossings, lack of enforcement, and impacts from horse manure on water quality and on the experience of other visitors using the rivers. Some commenters suggested that no new horse crossings should be created. Other commenters, who often identified themselves as equestrians, suggested that additional crossings should be added, or existing undesignated crossings should remain. These commenters often stated that reducing the number of river crossings and reducing access would create crowded, less enjoyable conditions for equestrians. Additional comments related to river use and crossings included:

- All motorized crossings should be prohibited. Commenters stated concerns about water quality issues related to these crossings, including contamination from petroleum products.
- The Roads and Trails Plan should create a section along the upper Current River that is not impacted by horse crossings.
- The Roads and Trails Plan should limit or eliminate vehicle fords, citing water quality impacts and opposition to motorized vehicles driving in the river. Commenters suggested that vehicle fords should be removed or replaced with spanned bridges. One commenter stated that vehicle fords are used as access points for ATVs and UTVs to travel up and down the river.
- Section 2.2.8 of the EA is not clear as to whether access to the gravel bar at Log Yard will be closed. The commenter stated that Reynolds County residents were not consulted about changing access to this area. Other commenters stated that closing access to the Log Yard area would close the closest access available to the town of Ellington.
- The river crossings north of Cedar Grove should be eliminated.
- The low water dam at Cedar Grove impedes fish passage and should be removed.

- It is unclear if the EA identifies all existing vehicle fords, including unauthorized fords. The commenter expressed concern that ATVs and UTVs are illegally fording the river via unauthorized access points.
- It is unclear in the EA what the widths of the proposed equestrian crossings will be. The commenter stated that the EA suggests crossings will be 100 feet wide, which would impact riparian habitat.
- The ford at Akers Ferry should be removed due to conflicts between canoes and motor vehicles.
- The Roads and Trails Plan should include a study of the effects from visitors who float the river, specifically citing trash left by these users.
- "Water creature friendly" sunscreen should be used by floaters.
- The Pine Crest River Access in Texas County should be closed to vehicle traffic. Commenters associated with the Mountain View Health and Recreation Club noted vehicles regularly getting stuck in the river and needing to be rescued, vandalism, trash left by vehicle users, and damage to the riverbed.
- There should be a quota system to limit the number of boats on the river, otherwise equestrian and ATV users would be unfairly singled out. Commenters also expressed their concern about overuse of the river by floaters and suggested limiting the number of floaters.

Roads

Many commenters supported removal of unauthorized roads. Specific concerns mentioned included sediment and gravel from roads in floodplain washing into waterways resulting in water quality impacts and concern that unauthorized roads enable motorized access to sensitive areas such as gravel bars. Several commenters suggested that removed roads should be restored to a natural state.

Other commenters suggested that existing unauthorized roads should remain open to motorized vehicles or be converted to multiuse trails. Some commenters requested that motor vehicle access continue to be allowed to areas that have been traditionally accessed by vehicles.

Some members of the public suggested that existing roads should remain to provide access for emergency vehicles or to provide access for visitors with disabilities.

Additional concerns related to roads included:

- The EA does not list all existing unauthorized roads, making it difficult for the public to know if these roads will be closed.

- The EA's accounting of the number of existing roads in the park is inconsistent. One commenter stated that the EA states the miles of authorized roads in the park as either 230 or 211 miles in separate places in the document. Another commenter stated that the number of roads listed changed between the preliminary alternatives and the Draft EA, but no explanation is given for the changes.
- Cemeteries should be accessible by road.
- Road access to the Log Yard landing should be maintained.
- Commenters suggested specific roads or road segments that should be closed:
 - NPS 786 should be closed to the public.
 - NPS 5-3179 should be converted to a walk-in trail.
 - Route 2-3007 should be closed at the boundary of NPS land.
 - The proposed park-maintained road NPS 666 is unnecessary and should be eliminated.
 - On Map B-11, near Jacks Fork mile 19, removed Routes 5-3194 and 5-3195 should be physically blocked.
 - Shannon County Road (CR) 308 should be closed and converted to a hiking trail.
 - The number of roads in the Clubhouse area should be reduced.
 - CR 425, Road 2-3055, NPS 810, NPS 4-3075, NPS 207, NPS 2-3036, NPS 771, NPS 807, NPS 786, NPS 2-3039, and Road 5-3193 should be closed.
 - NPS 123 should be a designated biking trail.
 - PS 819 should be administrative use only because it provides parking for a major gray bat maternity cave, which does not need to be visited except by park personnel.
 - The road to Lewis Hollow should be closed.
- Closing roads will prevent access to private property.

Trailheads and Parking

Some commenters suggested that additional parking and horse staging areas are needed beyond those proposed in the Roads and Trails Plan. Commenters suggested that additional parking for trailers could be located at Baptist Camp and Akers Ferry. Commenters expressed concern that without more designated parking for equestrians, users would park along roads or other unsuitable areas. Commenters also stated that additional horse staging areas would help to disperse equestrian users and reduce crowding.

Other commenters opposed any expansion of parking and horse staging areas. Several commenters stated that no additional horse staging areas should be created beyond the proposed staging area at Cedar Grove. Commenters expressed concerns that horse staging areas would result in increased fecal coliform bacteria and water quality issues. Other commenters opposed increasing infrastructure for equestrians, which they stated would encourage increased equestrian use of the park.

Additional concerns related to trailheads and parking included:

- Vehicle access to gravel bars should be limited, and parking areas should not be visible from the river, except at Two Rivers and Log Yard. Some commenters were opposed to allowing any motorized access to gravel bars.
- If parking lots are full, visitors should not be allowed to park on roadsides.
- The Powder Mill trailhead should be formalized and improved.

All-Terrain Vehicles and Utility Terrain Vehicles (ATVs and UTVs)

Many commenters suggested that ATVs and UTVs should not be allowed on roads and trails in the park. Noise associated with ATV/UTVs was a concern of many commenters, some of whom noted that visitors enjoy the quiet and tranquil setting at ONSR and stated that ATV/UTV use disrupts the experience of other visitors. Water quality impacts associated with motorized crossings and leaking gasoline and other automotive fluids were cited by some commenters as a concern from ATVs and UTVs use. Other commenters stated concerns that ATV and UTV use would result in erosion, damage to wetlands and riparian areas, air quality impacts, harassment of wildlife, and safety risks for other visitors. Some commenters stated that allowing ATV and UTV use in the park would inevitably lead to an increase in illegal trails and off-road use. Some commenters stated that ATV/UTV use areas are present in the nearby Mark Twain National Forest and, therefore, ATV/UTV use in the park is not needed.

Commenters stated that ATV and UTV use in the park is inconsistent with the Organic Act, NPS Management Policies, and Executive Order (EO) 11644. One commenter stated that operation of motor vehicles is prohibited EO 11644, Section 2.12 and 36 CFR Section 2.12(a)(1) if the noise is unreasonable considering the nature of the area, the impact on other park users, and other factors such as the effect on wildlife.

Several commenters suggested that if ATVs and UTVs are allowed on park roads, then a permitting system should be implemented. Comments stated that a permit system is in place for ATV/UTV use in Mark Twain National Forest.

Permits and Fees

Commenters suggested that the Roads and Trails Plan should implement a fee-based permit system for equestrian use. Commenters stated that permits are needed to better manage the number of equestrians using the park. Some commenters also stated that a permit system would provide an opportunity to educate visitors about which trails are designated for

equestrian use. Some commenters stated that they would not mind paying a fee for equestrian use in the park, while many others were opposed.

Some commenters expressed concern that requiring a permit for equestrians but not for other users is unfair, and permits should be required for all users if required for equestrians. Some commenters stated that permitting for equestrians is not necessary because current levels of use are acceptable. Several commenters stated that enforcing a permit system would be burdensome for park staff. Several commenters also stated that acquiring a permit would be burdensome to equestrians and could deter some visitors from coming to the park if they could not be assured of acquiring a permit in advance.

Additional concerns related to permits and fees included:

- A fee-based permit system should be implemented for ATV and UTV use in the park.
- Permits should be required for all users, including boaters and floaters.
- Permits should be required for all activities in the park except for hiking.
- No permits or fees should be required for any users.
- Fees collected should be used to support trail maintenance and enforcement.
- A permit should be required for river users on busy summer weekends.
- A special use permit should be established to allow mobility-impaired individuals to access the river and historic sites.

Commercial Use

Comments related to commercial use included the following issues:

- Limits should be placed on the number of boats, floaters, or equestrians allowed in the park by commercial outfitters.
- Commercial horse outfitters should have quotas for riders and their customers should be required to attend Leave No Trace training.
- Fines should be implemented for commercial outfitters if riders using their quota are caught in unauthorized areas of the park.

Other/New Elements

Members of the public suggested changes to alternatives or new alternatives, including the following:

- The Roads and Trails Plan should not close trails for five to seven years while new trails are constructed. Several commenters stated that trails scheduled for closure should remain open until proposed new trails have been constructed.

- The Roads and Trails Plan should increase the number of loop trails, which commenters stated would reduce the crowding along the linear river corridor and provide a better experience for equestrians, who prefer loop trails over out and back trails.
- Closed undesignated trails should be physically blocked off and restored with vegetation.
- The Roads and Trails Plan should provide the highest feasible amount of access, including river crossings and multipurpose trails. Commenters expressed concern that the Roads and Trails Plan would result in more crowded, less enjoyable conditions for the public due to reduced access.
- Undesignated roads and trails should be closed on an accelerated schedule.
- Certain areas should be designated for access from the river only. Specific areas mentioned included the right bank of the river between Baptist Camp and Round Spring, and the Welch Spring area.
- The Roads and Trails Plan should use volunteers to help maintain trails, instead of closing them. Commenters specifically mentioned the Backcountry Horsemen of Missouri would be willing to volunteer to help maintain trails.
- The NPS does not have the staff capacity to implement and manage the trails outlined in the Roads and Trails Plan.
- The Roads and Trails Plan should protect scenic easements on public and private lands within the ONSR boundaries.
- The EA should include a new alternative that better protects rivers and springs. The impacts of equestrian trail runoff in the Upper Current River watershed were not adequately assessed.
- The EA should consider what will happen to trails across private land if the ownership of the private land changes (for example, future landowners may not allow access).
- Vehicular access to gravel bar campsites should be reduced because vehicular use of these areas impacts water quality and is a safety hazard if flooding were to occur.
- The mileage of Americans with Disabilities Act (ADA)-accessible trails should be increased.
- The Roads and Trails Plan should protect the 4,500-acre Big Spring area south of Van Buren from motorized use.
- No new trails or crossings should be built until after existing unauthorized trails are closed.

- The NPS should partner with the Missouri Department of Conservation to upgrade the Blue Spring Nature Area Trail at the Current River Conservation Area.
- The Roads and Trails Plan should include scenic drive stops with interpretive signs.
- The Roads and Trails Plan should consider archeological looting in caves as it relates to vehicle access.
- No new trails should be constructed upstream from Cedar Grove.
- Leave No Trace principles should be taught to visitors and strictly enforced.
- Motorboat, equestrian, and ATV/UTV use should be restricted on the upper and middle portions of the Current and Jacks Fork rivers to reduce resource damage.
- Existing trails should be more clearly marked with signs.
- Trail conditions should be monitored, and trails should be closed when conditions are too wet, eroded, or unsafe.
- On Map B-8, the abandoned fire tower and access road are no longer shown on the map and should not be used by motor vehicles for either public or administrative purposes.
- Mile markers should be installed along the river so visitors will know where they are in relation to take outs.
- Additional campgrounds and other facilities should be constructed.

Trail Access to Specific Areas

Many commenters expressed their desire for specific trails to remain open. Many commenters mentioned concern that trails to Susie Nichols Cabin, Schaefer Lakes, and YY were shown in previous plans and are no longer shown as designated trails. Commenters expressed a desire for designated equestrian trails in these areas. Commenters also suggested keeping or designating trails near Pinecrest Cabins and Campground, Baptist Camp, Akers Ferry, Banks Ford Primitive Area, Howell-Maggard Cabin, Bluff School, Baptist Landing, Welch Spring Hospital, and Bee Bluff Cemetery. Commenters stated that many of these trails have been in use for decades and are sustainable.

Additional comments relating to specific trails included:

- The proposed trail north of Cedar Grove should be changed to a loop trail.
- On Map B-1, equestrians should be routed to a hitching post to reduce impacts at Susie Nichols Cabin and a loop trail should be created northwest of Parker Ford.
- The trail on the west side of the river from Cedar Grove to Parker Ford should be eliminated.

- The Roads and Trails Plan should include a loop trail that includes Gouldsmith Ridge and connects Shannon County Road No. 294 to the trail at Howell Ford above Akers.
- The trail from Baptist Camp to Akers Ferry, and other trails, should be linear rather than loop trails.
- The Cave Spring River Trail should be extended to Hickory Landing and a trail should be provided from Buck Hollow to the proposed Jacks Fork Natural Area Trail.

Indicators, Thresholds, Monitoring, and Visitor Capacity

Several commenters mentioned indicators, thresholds, monitoring, or visitor capacity. Concerns related to these topics included:

- The NPS should assess visitor capacity for equestrian use.
- The NPS should seek funding to determine visitor capacity, indicators, and thresholds.
- The EA does not contain sufficient information on what the desired conditions are and the impacts on the desired conditions.
- The number of visitors should be maintained at the current level.
- Removal of four primitive recreation areas is contrary to increasing visitor capacity. The commenter stated that the EA is not clear on the current usage levels for these areas.
- The Roads and Trails Plan should use miles of road as a monitoring indicator instead of number of roads.

Alternative Maps

Members of the public also provided suggested corrections to the location or status of various roads and trails in the park as shown on the maps in the EA. Specific comments about the alternative maps included:

- Maps in the final plan should make new hiking and horse trails look more different, horse crossings should have a map symbol, and recreation areas should have a symbol.
- Maps in the EA show inaccuracies for CR 539, Ridge Road, and NPS 733. The commenter also stated that Shannon County Road labeled on the map as a spur to CR 539 is actually a primitive unmaintained road.
- The proposed new trailhead in the Middle Current section is not shown on the maps.
- A portion of the Mose Prater Cave tract is incorrectly shown on private land.

- Williams Landing should be added to the map.
- The Partney River Trail labeled on the map does not really exist.
- The trail that passes into the NPS portion of the Tunnel Bluff Natural Area should be shown on the map.
- There is a steep drop off, not a ford, at Blue Spring/Bluff View.
- Bluff School is shown on the map on the wrong side of the horse trail from the ford to lower Flying W.
- Road 5-3191 is private and should not be shown on the maps.
- The historic Civilian Conservation Corps trail to Alley Overlook is not named on the map.

Illegal Use and Enforcement

Commenters had numerous concerns about illegal use and enforcement of existing regulations at ONSR. Concerns expressed regarding illegal use and enforcement included:

- The Roads and Trails Plan does not adequately address closure and removal of illegally created trails and horse crossings at ONSR. Commenters stated that the Roads and Trails Plan should commit to remove all unauthorized trails.
- A lack of law enforcement has allowed the proliferation of unauthorized trails. Commenters stated that the 2014 GMP proposed increased enforcement against off-road and off-trail travel, yet unauthorized trails have continued to increase.
- The park should receive adequate funding and staff to allow it to close unauthorized trails. Commenters suggested the Roads and Trails Plan will not be successful without additional staff for enforcement.
- Past lack of enforcement and unauthorized use demonstrates that new trails will not be used as authorized.
- Closure of unauthorized trails and increased enforcement should occur before any new trails are constructed.
- There is a lack of enforcement against equestrians trespassing on private property.

Suggested New Information

Members of the public provided suggestions for new information and changes to the information in the EA. These comments included suggested new information about the effects of equestrians on water quality, and suggested information about threats to Ozark hellbenders. Suggested new information included:

- Two commenters stated that horse manure does not have adverse effects on water quality and provided references to information on this topic.
- One commenter stated that equine crossings are not a threat to Ozark hellbenders and provided information about impacts from nonnative trout on hellbenders.

Issues

Water Quality

Many comments related to water quality focused on the effects of erosion and other impacts of equestrian use. Commenters stated that water quality should be carried forward for detailed analysis in the EA. Commenters cited the Current River's status as a designated Outstanding National Resource Water and a Tier Three Water and noted that the river is affected by runoff and animal waste from equestrian use and is also used by people for swimming. Other commenters noted that the Jacks Fork River is impaired due to excessive levels of *E. coli*. Several commenters stated that no degradation of these rivers is permitted under water quality regulations. Several commenters disagreed with the EA's dismissal of water quality from detailed analysis and stated that the EA does not take a "hard look" at water quality impacts as required under NEPA.

Additional concerns related to water quality included:

- Equestrian and ATV/UTV crossings of streams have adverse impacts on water quality. Concerns included increased erosion, fecal coliform pollution from horses, and adverse impacts on the health and enjoyment of swimmers and floaters when encountering animal waste in the river.
- The EA should address cumulative impacts on water quality. Commenters stated that cumulative water quality impacts of nearby timber operations, sand and gravel mining, and nonpoint sources of pollution should be considered.
- The Roads and Trails Plan should consider the effects of human waste in the river.
- There is no scientific evidence that horse crossings of the Current River cause adverse effects.

Socioeconomic Impacts

Many commenters stated that spending by equestrians contributes to the local economy and supports local businesses. Many commenters expressed concern that limiting access to equestrians and ATV/UTVs would cause these users to go elsewhere, with resulting adverse impacts on local businesses that depend on tourism.

Additional comments related to socioeconomic impacts included:

- Closing trails for five to seven years while new trails are constructed will result in adverse economic impacts on local equestrian campgrounds.
- The EA does not consider the socioeconomic impacts on the town of Ellington in Reynolds County.

Erosion

Most comments related to erosion expressed concern that river crossings by horses and ATV/UTVs result in erosion, as discussed under *Equine Use, ATVs and UTVs, and River Use/Crossings*. Some commenters suggested that erosion on trails and at river crossings was one of the main environmental issues caused by horses and ATV/UTVs. Some commenters stated that overuse by horses and ATV/UTVs damaged vegetation, which in turn results in erosion. Commenters specifically mentioned erosion issues on the river from Tan Vat to Akers Ferry, and in the area around Schaefer Lakes and the Susie Nichols Cabin. Several commenters stated that erosion caused by horses is a minor issue compared to periodic flooding along the rivers.

Fish

Commenters expressed concern about the quality of the trout fishing in the upper reaches of the Current River, especially the Blue Ribbon Trout Area set up by the Missouri Department of Conservation. Commenters expressed concern that increased access along the river will increase the number of fishermen, which will adversely affect trout and adversely affect the fishing experience. Several commenters also stated that horse trails should not be allowed in the upper Current River Blue Ribbon Trout fishery, citing concerns about erosion and habitat damage resulting from equestrian use.

Threatened and Endangered Species

Comments related to threatened and endangered species were focused on impacts on the Ozark hellbender and threatened and endangered bat species. Comments on threatened and endangered species included:

- Sedimentation and degraded water quality resulting from equestrian and ATV/UTV use are threats to the Ozark hellbender.
- Nonnative trout are a threat to the Ozark hellbender and should be reduced or eliminated from the Current River.
- The EA should include an analysis of cumulative impacts on Ozark hellbender and threatened and endangered bat species.
- 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.

Vegetation

Many commenters stated that equestrian and ATV/UTV use damage or remove vegetation, resulting in erosion. A commenter stated that vehicles have minimal impacts on vegetation on gravel bars because these areas are regularly flooded. Another commenter stated that horse droppings are likely to spread invasive plants.

Purpose and Need

Some commenters suggested that the purpose and need for the project improperly favor access for recreation over protection of resources. These commenters stated that protection of resources should be the primary mission of the NPS, rather than balancing protection with recreational uses. A commenter stated that favoring visitor access is a violation of the ONSR Enabling Act, the NPS Organic Act, the General Authorities Act, and the Redwoods Act. Another commenter cited the requirements of the Wild and Scenic Rivers Act for scenic rivers to be largely undeveloped and primitive. Another commenter stated that the purpose and need for the Roads and Trails Plan should prioritize improving the park system of roads and trails instead of limiting access.

Planning Process and Policy

Several comments questioned the adequacy of the NEPA analysis presented in the EA. Some stated that the EA improperly analyzes Alternative A by relying on the NPS's failure to implement and enforce current management policies. One commenter stated that Alternative A was not selected partially based on funding constraints related to enforcement, although Alternatives B and C would be subject to the same funding constraints. As previously described, some commenters suggested that the EA improperly dismisses water quality from detailed analysis. Several commenters stated that the EA should analyze cumulative impacts. Finally, several commenters stated that an EIS must be completed to comply with NEPA because the project may significantly affect the environment.

