

National Park Service
US Department of the Interior

Ozark National Scenic Riverways
Missouri



PUBLIC SCOPING REPORT

Roads and Trails Management Plan / Environmental Assessment



February 2016

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SUMMARY

During the fall of 2015, the National Park Service (NPS), via a notice of intent in the *Federal Register*, announced a formal public engagement process for development of a Roads and Trails Management Plan / Environmental Assessment (plan/EA) for the Ozarks National Scenic Riverways (park). As directed by the National Environmental Policy Act (NEPA), public scoping for environmental assessments typically takes place over a 30-day period. The public was asked to share their thoughts, concerns, and vision for the plan/EA between October 26, 2015, and November 25, 2015.

The NPS Planning, Environment, and Public Comment (PEPC) website is a web-based system that allows the public to gain access to current plans and related documents that are available for review and open for comment. Public comments can be submitted through the PEPC system, and the public is able to access schedules for particular projects as well as specific information about public meetings. 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 held at Eminence High School in Eminence, Missouri on October 26, 2015; 23 people attended the public open house at the Van Buren Youth and Community Center in Van Buren, Missouri on October 27, 2015; 48 people attended the public open house at the Salem City Hall Auditorium in Salem, Missouri on October 28, 2015; and 57 attended the public open house at the Holiday Inn in Sunset Hills, Missouri on October 29, 2015. During the public open houses, approximately 180 comments on flip charts and 25 comment cards were received. All hand-written comments received during the public open houses or via standard mail were transcribed and entered into the PEPC system. In addition, approximately 1,800 form letters were received, most of which were from the Center for Biological Diversity. Please see “Definition of Terms,” below for an explanation of terms such as comments and correspondences.

To inform the public of the scoping process, the National Park Service distributed a newsletter describing the context for the plan and how to comment. This newsletter provided a general overview of the planning schedule; provided background on the purpose, need, and objectives of the plan/EA; and provided topic questions for the public to answer.

In order to reach a broad audience, the newsletter and information about public scoping were shared with the public in a variety of ways. Paper copies of the newsletter were mailed to individuals on the park’s general mailing list (1,836 newsletters were mailed). Additional paper copies were also provided at the public meetings and at the park’s visitor center. A press release, announcing public scoping, received coverage from a variety of news media and advocacy organizations. The press release was distributed to local and regional media outlets, including newspapers in Salem, Eminence, Van Buren, Poplar Bluff, and St. Louis, Missouri. E-mail was used to send updates about the public scoping period. E-mail is still being used to update individuals on the progress of this planning effort. Social media (Facebook) was also used during the scoping period to inform people about the planning effort.

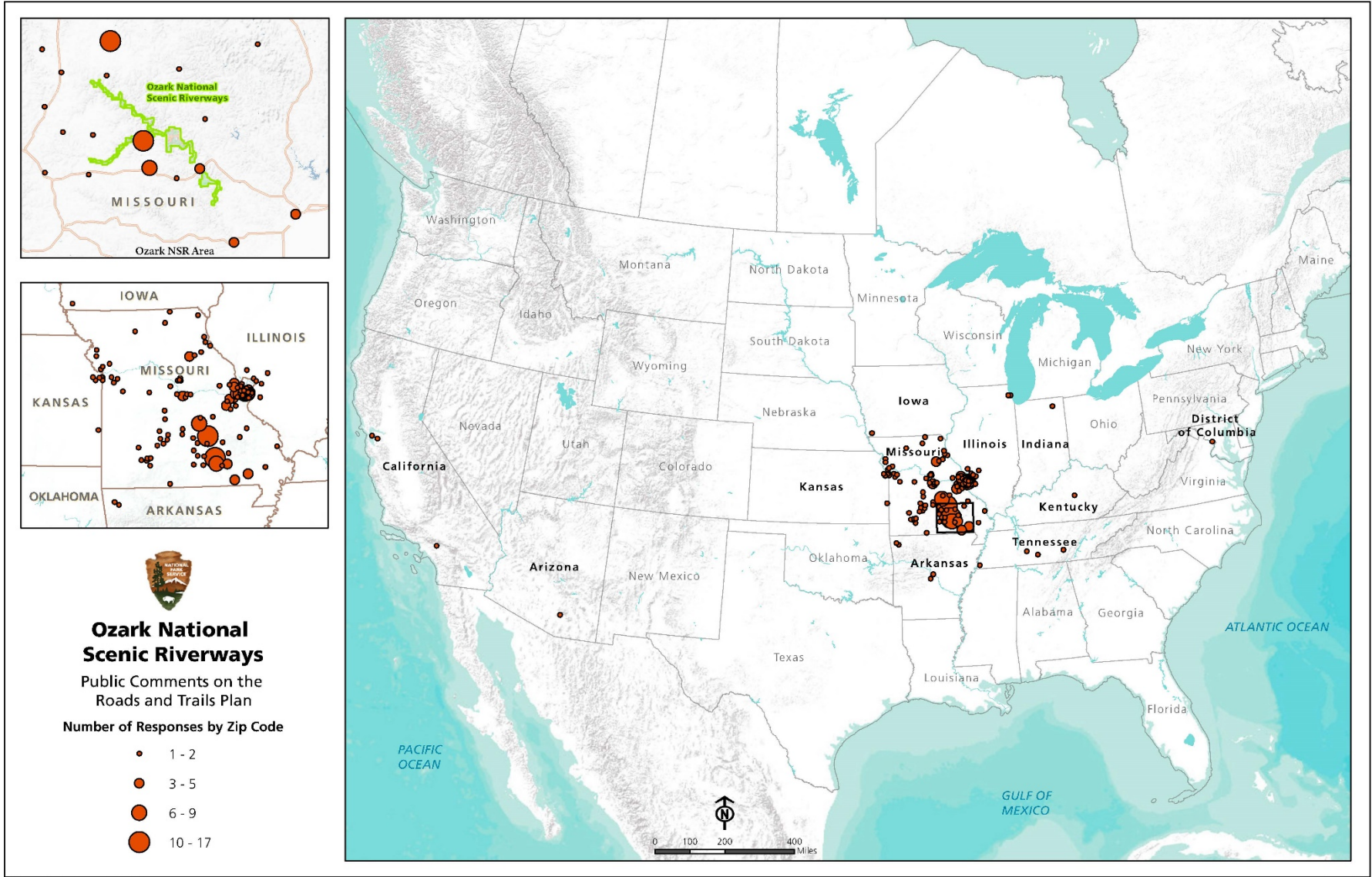
The National Park Service collected public comments during this scoping phase of the planning effort to understand the public’s perspectives on key issues and desires for plan/EA at the park. Within this NEPA process, thoughts and ideas from individuals, organizations, and agencies are analyzed and considered equally. For this reason, the unique content of comments, rather than

the number of times a comment was received, will be used to guide the development of a range of reasonable management alternatives for the plan. This scoping report summarizes all public comments received during the public scoping period.

The following table provides the distribution of public comments that were submitted directly to the PEPC system. The map on the next page depicts the distribution of these public comments by zip code.

Table 1. Distribution by State of Public Comments Received

State	Percentage	Number of Correspondences
Missouri	87.80%	259
Illinois	3.05%	9
Tennessee	1.36%	4
Arkansas	1.36%	4
Unidentified	2.37%	7
California	1.02%	3
Kansas	1.02%	3
Arizona	0.34%	1
Indiana	0.34%	1
Hawaii	0.34%	1
Iowa	0.34%	1
District of Columbia	0.34%	1
Kentucky	0.34%	1
TOTAL	100.00%	295



NPS Des Moines Service Center Planning Division

January 2016

Distribution by Zip Code of Public Comments Received

In addition to general public comments, the National Park Service also received letters from official representatives of the following agencies and organizations:

- BikeWalkKC
- Cave Research Foundation
- Center for Biological Diversity
- Extreme Electrical Racing
- Howell-Oregon Electric Cooperative
- Indian Trails Chapter of Show Me Missouri Back Country Horsemen
- International Mountain Bicycling Association (IMBA)
- Missouri Bicycle and Pedestrian Federation
- Missouri Parks Association
- Monroe County Saddle Club
- NEMO River Valley Chapter of Show Me Missouri Back Country Horsemen
- L-A-D Foundation
- Pinecrest Campground and Trail Ride
- Rock Island Trail
- Route 66 Trails Fund
- Saint Louis County Department of Parks and Recreation
- Sierra Club Missouri Chapter
- St. Louis Adventure Group
- St. Louis Mountain Bike Camps
- Trails End Stable LLC
- US Environmental Protection Agency Region 7

Definition of Terms

Correspondence. A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, note card, or open house transcript.

Comment. A comment is a portion of the text within a correspondence that addresses a single subject or issue. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis.

Comment Summary. A comment summary is a grouping that is centered on a common subject. Comment summaries combine similar comments. Representative quotes from the comments used to create a comment summary may also be presented.

PUBLIC SCOPING COMMENTS

The following topic questions were posed to commenters to frame and begin the conversation surrounding the plan/EA at Ozark National Scenic Riverways:

1. What types of opportunities should the park's land trail system provide more of for the public?
2. How do you feel about multi-use trails in the park (i.e., equestrians, hikers, and mountain bikers sharing the same trails)? What tools could we use to address potential conflicts between different user groups?
3. We will be analyzing the existing network of designated trails, unauthorized/user-created trails, and potential new trail alignments within the National Riverways. What factors should we consider as we update the network of park trails and consider where new trails might go?
4. We will be evaluating existing roads in the Riverways to determine the best road network for the future. We want to provide a road network that allows for adequate visitor access while also protecting the natural and cultural resources of the park. What factors do you think we should consider as we evaluate the existing road network?
5. Are there other considerations we should think about as we examine the park's road and trail system?

Within each topic question, comment summaries are listed with representative quotes taken from individual comments. Many commenters provided specific thoughts on management of the roads and trails in the park. These suggestions often were provided within topic questions 3, 4, and 5. However, within the report, similar topics may be presented under multiple topic questions.

Topic Question 1: What types of opportunities should the park's land trail system provide more of for the public?

In response to this topic question, commenters expressed the many types of land-trail based opportunities and recreational activities they wish to have inside the park. Commenters frequently identified hiking, biking, equestrian, and motorized vehicle trails, and access to trails as opportunities they wish to be expanded or added inside the park.

Comment Summary #1: Hiking Trails

Well-marked and maintained hiking trails were considered one of the most valued recreational pursuits at the park. Commenters indicated that the impacts associated with hiking trails are less intense than those associated with horse and unauthorized all-terrain vehicle (ATV) trails and suggested that hiking trails should be expanded along the river to fully experience the beauty and tranquility of the park. Some commenters requested trails that access remote areas, with plenty of options for camping. Others indicated that loop hiking trails are preferable.

I think the Ozark Trail should be maintained as a hikers only trail. It seems like the bulk of the trails in the area are along the Current River for equestrian travel. Perhaps some trails along the Jacks Fork?

The National Park Service should support completion of a foot traffic-only long distance hiking trail from Current River State Park to Owl's Bend.

Well marked hiking trails are always a plus

I would like to see more trails coming off the river, and better marked.

I would like to see more hike-only trails that are lower impact than ATV or Horse trails. There are many unique features off and near the river ways that could be opportunities to deepen the recreational options in the park and provide alternatives for colder weather recreation or off-river exploring.

-access to remote areas via trails to camp

There is a limited number of hiking trails currently. I would like to see more trails that are loop trails and offer short cuts so that a hiker can decide on short or long trips. One way trails, like the Ozark Trail, are fine but having a trail that loops back to the starting point is better for day hikers like me.

Loop trails of 10 to 15 miles suitable for one-night backpacking trips (primitive camping)

The park needs more hiking opportunities of all kinds. Short distance loop trails in the campgrounds and longer distance trails for backpackers and folks who just want to hike 5 - 7 miles. Currently the park has very few land based recreational opportunities beyond the confusing and poorly marked maze of trails near Big Spring

I would prefer to see the majority of the park's land trail system dedicated to hiking trails as I assume these would have the lowest impact to the natural and cultural resources. Any update to the

network of park trails should have as the primary objective, protection and enhancement of the natural resources.

Comment Summary #2: Biking Trails

Some visitors indicated that mountain biking was their favorite activity, and several suggested that mountain biking opportunities be provided in the park. Other suggestions included charging a permit fee for this user group, developing a mountain biking route on and along the Ozark trail or along tributaries, and providing biking trail segments of varying difficulty levels. Commenters suggested that increased biking opportunities would benefit tourism and the local economy.

Create mountain biking trails and segments of varying difficulty, catering to a variety of users and ability levels, a variety of lengths, and a variety of use types- -occasional use, day use, multi-day visitors, extended tours, mountain bike touring/camping, etc.

We support a through mountain biking route on and along the Ozark Trail. The Ozark Trail section within ONSR is one of the major remaining mountain biking gaps in the Ozark Trail. The plan should create a route through the ONSR and adjoining lands to plug this gap in the Ozark Trail mountain biking system. Creating a mountain biking connection through the ONSR area to connect the Ozark Trail for mountain biking use is a project of regional, statewide, and national significance.

Mountain biking opportunities on singletrack trail and on unpaved roads should be thoroughly explored. In addition to singletrack opportunities a "gravel network" of mountain bikable roads and trails in the area- -perhaps including roads inside and outside the boundaries of ONSR- -would be of major interest.

Allow mountain biking as a default unless there is a reason it needs to be restricted. Capitalize on the many cyclists who are already riding by on the TransAmerica Trail on Highway 106 and make the ONSR accessible to them as much as possible. The most family-friendly hiking/mountain biking trails would be ones that go along rivers and tributaries. The most successful trails are long and connect special features that people want to access.

Mountain biking tourism, if implemented in a way similar to other states, would be an ideal complement to float trips and other tourism opportunities currently available in ONSR. Mountain biking expeditions would help visitors stay longer, draw visitors from longer distances, drawing far more out of state and international visitors, and provide a positive impact to the local economy. Mountain bike tourism visitors are high quality visitors who respect the land, the environment, and the communities they visit. This a type of tourism that the ONSR communities want to foster and encourage, because it is good for the communities and good for the future of ONSR.

the trail system should be open to allowing people to ride bicycles, whether that be mountain bikes on trail or gravel/cross bikes, on gravel roads.

Mountain biking on trails and roads of significant length. They may need to be separated from horses depending on volume of users and types of trails.

Create mountain biking trails and segments of varying difficulty, catering to a variety of users and ability levels, a variety of lengths, and a variety of use types- -occasional use, day use, multi-day visitors, extended tours, mountain bike touring/camping, etc.

I think that mountain biking is very popular and has a very active community. I think that to support the system you should consider an annual permit fee. Brown County State Park in Indiana does this and has a separate trail system for bikers. It works very well!

Comment Summary #3: Equestrian Opportunities and Trails

Several commenters recommended providing equestrian trails. Some commenters suggested specific amenities that would be desirable on equestrian trails, including adequate parking for trailers at trailheads, hitching rails, mounting blocks, tail bags for horses, additional miles of equestrian trails, and overnight camping for equestrians. In addition, some commenters noted the economic benefits that the local area derives from horseback riding.

How it will effect the economy in all the county's if you start limiting the horse traffic on the trails. The equestrian riders bring a lot of money to the local economy when they come from all over the US to see the beautiful Ozarks, and by increasing the trail systems along the upper current river it will help reduce some of the over crowding and wear on the trails around eminence.

Whispering Pines Campground and Trailride is up for sale, its already set up with stalls, electric, showerhouse ect. Nps could purchase Wp and purchase/lease the 400 acres next to it, to create an area just for horseback riders with a great revenue and charge for overnight camping and day riding

My hope is that your committee will consider the heritage of horseback riding in the Upper Current River area and provide a trail system that provides enough trail miles to allow for many miles of trail. My biggest fear is the overuse of a trail thus causing resource damage. Please keep in mind the number of riders in this area and plan for a system that provides the needs for the numbers. Hopefully more amenities will be available to riders such as an overnight camping area with restroom, and layout of sites that would be level and well planned for trailers and trucks of today's length.

Realizing that the horseback riders ride long distances, giving them a large network of trails with loops, rather than just linear trails. Keeping the trails in the scenic parts of the area and not relocating away from the beautiful sights available.

Maintain access to historic sites and trails for equestrian use. (Destinations should include Susie Nichols cabin and trail, Shafer Lakes, Baptist Camp, Cedar Grove community, Cedar Grove low water bridge and campground, Scenic Bluff area (mm 4.5), Akers store/ferry/picnic area, Mt. Zion Church, Howell-Maggard Cabin, Welch's Spring, hospital and trail, Spring Creek waterfall (mm 13), Bluff School, Parker Ford Crossing, Lower Parker School, Flying W. Beach and camping area, cemeteries, etc.) For many of us seeing nature is now limited to the time we can spend trail riding.

There is undoubtedly a need for designated equestrian trails in the upper Current River, where there is considerable equestrian use with no designated trails, but designated trails should be limited to approximately 35 miles, well designed, clearly marked, and with only a very few authorized river

crossings. The remaining trails must be closed and restored to a natural condition, with adequate enforcement to assure success.

As an equestrian I am in strong support for designated multiuse trails for the Park in the Upper Current River area. This will provide the opportunity for equestrians to have trails that are protected by law. Staging areas and trail heads should be adequate to support the parking of trailers. Amenities should be placed in these areas such as hitching rails, mounting blocks, restrooms, etc. What is really needed is an overnight camping area for equestrians. All other user groups have these amenities and horseback riders should be treated equally.

NPS should provide family orientated equestrian facilities located at Cedar Grove in Mery Field, across from B hwy and Mery Field or by the toilets before you get to the first bridge in the field across where the old ranger trailer use to sit. Due to flooding all 3 fields would be safe and would have a way out in case of emergency. All these fields could hold 25-40 campsites, the horseback riders would be away from the campers, swimmers, canoers, floaters and fisherman. The equestrians do need to cross a river to keep horses cool while riding during the summer, need an area away from the swimmers, so there will be no complaints.

-provide tail bags for horses so manure doesn't go in river/gravel bars

Comment Summary #4: Motorized Vehicle Trails

Commenters suggested that the park should provide more trails suitable for motorized vehicles, particularly with access to rivers and campsites, and noted that visitors have been driving motorized vehicles in the park for generations. One commenter suggested that ATVs/Utility Vehicles (UTVs) should be allowed by permit only with priority given to disabled and mobility impaired visitors, while another visitor suggested that the tram below Van Buren should remain open to ATV/UTV use.

Atv and Utv trails with access to the water.

Also the motorized guys could really use a place where they can enjoy the park systems as well. Jeeps and Motorcycles. Campsites accessible by offroad motorcycle would be really nice.

The Tram below Van Buren needs to stay open to atv and utv use. Being able to utilize this trail next to the river has been a tradition for generations of area residents. Not everyone can afford a jet boat. As the population ages there is a need for senior citizens to utilize their utvs and atvs.

I would open those gravel roads to choked down (35 mph maximum) slow, mufflered ATV or UTVs on a permit only basis with priority given to disabled and mobility impaired patrons. It would be nice to have trails marked by distance and difficulty.

Comment Summary #5: Continued Access

Commenters noted that additional restrictions on visitor access would reduce visitor enjoyment inside the park and suggested no further restrictions be placed on areas that visitors can access. Other commenters suggested that the park should create a network of trails connecting different park trails with one another and with regional trails outside the park. Commenters stated that

loops and through trails expand opportunities and allow visitors to experience more of the park; they also suggested including options for varieties of terrain and difficulty levels.

Please consider connecting new ONSR trails with existing, developing and proposed local, state, regional and national trails, such as the Ozark Trail system and the TransAmerica Trail/US National Bicycle Route 76.

In addition to proper design and construction is making 'through' trails. Not just loops, but trails that connect to other trails, which create opportunities for people to hike/bike/horse ride longer, multiday 'adventure/epic' journeys. The Appalachian Trail would not be such an epic trail if it was a series of disconnected loops and sections. I don't think the OT will ever rival it in popularity (or PCT, or CDT, etc) but it could be a big draw at some point when it connects through Arkansas (OHT) and stretches in one uninterrupted section all the way from St. Louis.

If possible, providing a network of trails with round trip options and possibly one way trails as opposed to only out and back trails would be ideal. Including options for varieties of terrain, difficulty levels, and distances is also important.

Trails with loops are always good. Cut throughs to shorten larger loops are also a good idea.

Offer beautiful Loops to various destinations as well as Linear connections to existing features, trail head parking, and future attractions (nature centers, etc)

Continue current access and add ZERO new restrictions to access. Continue to allow the taxpayers the opportunity to enjoy this beautiful country we live in with NO NEW RESTRICTIONS to access. For those who live in this area it is our heritage and we should be allowed to visit remote cemeteries, former family farms, locations we enjoyed while growing up and the places our ancestors have told us about/enjoyed freely. There is already TOO MUCH GOVERNMENT CONTROL!

Well maintained trails built to minimize erosion, but providing adequate views of the Rivers for hiking, biking and horseback riding. Trails should be well marked and easy to follow.

The trail system should be inclusive of as many groups as feasible, hikers, bikers, equestrian and handicapped.

We should create connected networks of trails and connect major regional and statewide trail systems for hiking, mountain biking and equestrian trails.

Hiking, mountain biking, equestrian, and motorcycling (off road) should be allowed. Hiking and mountain biking both present minimal impact to the environment, and therefore should be included even if other modes of transportation are not included.

Allow more access points to the river.

Comment Summary #6: Other Opportunities

Recommendations for additional opportunities in the park included overnight backpacking, open fields and trails for handicapped visitors, hardened surface trails for all-weather use, wayside exhibits, additional or larger parking lots, picnic areas, more restrooms, increased trail maps and education, cleaner rivers (which could be mitigated through limiting horses), fishing,

increased opportunities for solitude, prohibiting all motorized intrusion in the river for one full day, and established locations for painting and photographing the scenic vistas. Other commenters indicated that the park provides enough opportunities and that no other services are needed.

Mountain biking and overnight back packing

More open fields and trails especially for handicap individuals.

The park already provides plenty of opportunity for those who are willing to seek it. We don't need more trails and roads to pollute this ecosystem

Designate locations for placement for handicap accessible trails, such as with existing parking lots, campgrounds, and picnic areas at Cedar Grove, Ackers, Welch's Spring Trail and the Susie Nichols Cabin and Trail

**PROVIDE HARDENED SURFACE FOR ALL WEATHER USE/AND MULTI USE/
EQUESTRIANS, BIKERS AND HIKERS, ATV.**

Education pertaining to trail etiquette/ trash needed (long-term)

People always stop at interpretative signs. More of those on a variety of topics (historical, cultural, geographical, ecological, etc.) would be enjoyable.

Waysides, picnic areas and restrooms

Trail maps needed (Salem Natural Cultural Resource Center)

Cleaner swimming and floating opportunities by capping limiting number of horses with permit system (i.e. we do not have unlimited mules going up and down the Grand Canyon)

Marking of parking lots, size of parking lots based on size of vehicles to use them and number of vehicles.

FISHING

Restrooms need to be placed at each trailhead.

The roads and trails plan should include as a goal provision for at least one full day float, free of motorized intrusion.

The trail system at Big Spring is marvelous with various type of habitat and views including through proposed wilderness but some of the trail aren't kept up. Better maps and signage as well as interpretive nature walks and history. Visitors are not getting the real flavor of the park at Big Spring.

More opportunities for solitude.

Consider something like an art/photography trail with points along the trail with views and space for people to set up for painting, sketching or photography.

Topic Question 2: How do you feel about multi-use trails in the park (i.e., equestrians, hikers, and mountain bikers sharing the same trails)? What tools could we use to address potential conflict between different user groups?

In response to this topic question, commenters expressed their preferences regarding multi-use trails, including reasons for supporting or opposing multi-use trails. Commenters also offered suggestions on how to address potential conflicts among user groups (e.g., better education, clear signage, a system that allows certain uses on predetermined dates, collaboration opportunities, wider trails, and trail conditions).

Comment Summary #1: Opposition to Multi-Use Trails

Commenters provided a variety of reasons to support why they are against multi-use trails, including the following: equestrian use can leave trails in undesirable conditions and degrade the experience for other visitors, mountain bikes can scare horses and create dangerous situations, and horse use can make the trail surface incompatible with mountain biking. Commenters noted that different uses require different trail conditions and have different maintenance requirements.

As a hiker and mountain biker, I have discovered that trails open to equestrian use tend to be difficult to hike and bike on. Mountain bike trails need to be hard packed and horse hooves tend to chew up and soften dirt, especially when travelled when muddy. I am not against equestrian trails by any means and think that horse trail riding is a wonderful outdoor pursuit and horses are hard on trails. I've also noticed that horse trails tend to cross rivers a lot and that is not ideal for mountain bikes.

Equestrian users MUST HAVE SEPARATE trails. Why? Because horse hooves create much loose soil/powder on the trails they use. This powder gets mixed with horse manure that contains E. coli and other fecal organisms. Therefore, hikers and pedal bikers should NOT have to walk or bike in this horse manure dust which can be very harmful to people, especially those with asthma and allergies. Therefore, single use trails are essential, so that hikers do not have to deal with mountain bikes and horse traffic.

Mountain bikers pose a significant safety hazard for equestrians, because equines are often startled by the fast-moving and unfamiliar sight of a rider on a bike. The equines may spook and bolt, out of control; consequences can be disastrous, especially if the interaction occurs in a dangerous spot on the trail

Multi-use trails don't make anybody happy. Hikers do not get along with bikers. Bikers do not get along with equestrians. Equestrians tear up trails. Bikers want new and more trails ad infinitum, and will build them illegally. It's a sad situation of human selfishness transposed on the natural environment, and very difficult to manage, I'm sure. I don't know what the answers are, but I do feel certain that land sustainability, and quality bird/wildlife habitat should supercede selfish human use issues, and if users actually care about the habitat they visit, they will and should prioritize them. Whatever the protests, please don't indulge those who engage in "wreck-reation."

The main problems that mountain bikers present to backpackers are: 1) safety hazards due to incompatible speeds (Backpackers have a limited ability to see and hear traffic approaching from

behind and lack maneuverability due to heavy loads.) and 2) increased erosion, mud, compacting and widening of trail surfaces.

Comment Summary #2 Support of Multi-Use Trails

Supporters of multi-use trails also provided a variety of reasons for their support. Supporters believe multi-use trails are the best way to maintain trails; they maximize visitor satisfaction and number of users while encouraging more people to volunteer to assist with trail maintenance; and they are better constructed. One commenter stated that there is not enough use on some single-use trails, and they are at risk of becoming overgrown.

Multi-use trails, built and designed properly, have been proven to bring more access and enjoyment to trails systems. It would be great to have all users be able to enjoy one of the most beautiful places in the US.

I think multi-use trails would be a great addition to the Ozark National Scenic Riverways. Opening the trail to various groups will increase usage of the trail. I think this would increase awareness for the trail and would create more outlets for volunteer work when trail maintenance is required. In addition, more trail traffic would lead to more traffic for the local economy in the Ozark region. I think there are multiple trails in St. Louis that have been successful as a multi-use trail.

Multi use trails always get the best design and support. I am a mountain biker. I love bike/hike only trails but our population is usually not strong enough to support a major trail system outside of metro areas.

Many other trails in Missouri are multi-use, such as the Berryman trail, and Council Bluffs trail, and many sections of the Ozark Trail. Use of these trails is rather light most of the time, and there is no need to segregate different types of users onto different trails. Restricting users of trails just reduces the traffic, and creates more of a maintenance issue. Some parts of the Ozark Trail are closed to bikes, some even to horses, those sections are usually overgrown and in danger of returning to the forest.

I have no problem at all with multi-use trails. I only hike and generally just day hike and camp in the area at night by my car. In my experience, multi-use trails are better marked and maintained because more people use them, which makes them easier to follow, and they probably get more attention from the owning agency since they are used more. Yes, trails used by horses and bikes generally have more erosion and are muddier, but it isn't that big of deal. I think anything that gets people out of their cars and ATVs and in the woods is a plus!

Comment Summary #3: Construction and Maintenance for Multi-Use Trails

Commenters provided suggestions regarding construction, maintenance, and signage of multi-use trails. Some commenters noted that the trails need to be wide enough to safely pass other users, while other commenters suggested adding signage throughout the park to help mitigate conflict among users, including information such as proper trail etiquette, protocols, and user-friendly maps. Some commenters stated that trail conditions should be considered when determining appropriate use, including closing trails during wet weather/muddy conditions, making sure trails comply with the Americans with Disabilities Act of 1990 (ADA), and limiting delicate terrain areas to pedestrian-only use.

As an avid horseback rider, I feel that the trails should be open to everyone but precautions should be in place for the horses. Horses are easily spooked by mountain bikers. The bikers should be educated in approaching horses.

Multi-use trails need to be 8-10 inches of hard tamped gravel, well maintained and patrolled at least quarterly so that multi-use by horses, bikes and people do not result in torn up trails. I wouldn't be opposed to concrete-hardened sand and soil (lay down dry cement, let it harden on its own) to avoid these trails getting torn up. They should be to ADA grade, with plenty of switchbacks. The trails need to be wide enough for passing by bicycles. I wouldn't attempt them without a commitment from horse and bike people to patrol and report in on road conditions. There need to be adequate turnouts for passing and standing, and horsemen would be responsible for clearing any horse apples off the roadway. I would use a stem and loop arrangement, with some trails being only for one manner of conveyance. If there were some major event of one type of conveyance, I would close it to other forms.

I'd suggest any trails that are designated for multi-use, be built wide enough for passing each other. Other trails that might be more remote or challenging could be narrower single-track and designated for mountain bikers and hikers. In any case, trails should be cleared well enough to avoid blind corners so we don't all spook each other or collide.

Wider trails.

For most trails multi-use works. Signage at trail heads would give trail protocol. Racing a mountain bike around blind curves is dangerous for equestrians; taking a skiddish horse out on public trails is dangerous for everyone. (I hike, bike and ride a trail horse.) Trail improvements include eliminating blind curves, creating passing spots, creating 'adopt-a-trail groups' to educate trail users in sharing the trails.

consider temporary closures when it very wet (2-3 rain/day)

Weighing the pros and cons of how each group affects the others in different situations such as weather, seasons, and time spent on the trails together.

The most ecological sensitive and delicate terrain should have only pedestrian trails.

Comment Summary #4: Developing a Date system for Different Users

Commenters suggested implementing trail sharing between multiple uses using a date system (e.g., restricted use on alternating days for different user groups) to avoid congestion and conflict on the trails.

I think that all of the trails should be multi-use when the terrain allows. I have recently ridden in Colorado on trails where hikers, bikers, and horses were all using the trails at the same time and experienced no problems. I would have some of the trails multi-use all of the time and some of the trails use some type of even/odd date system to allow one type of activity at a time. This would allow all users to use some trails any day of the week, but would also provide a single activity environment for the three main user groups on some days and on some trails.

I recently visited Tsali Recreation Area in North Carolina to bike and they had a unique trail sharing arrangement that I hadn't seen before for bikers and equestrians. Hikers could use any trail

at any time. Bikers and equestrians rotated trail use so that at anytime on a given trail section it was either open to bikers or equestrians but not both on the same day. The days were clearly posted at each trailhead and the area website. This again requires respect from each user group to follow the rules but the trails were in good shape and it seemed like a system with some merit.

Directional guidelines for alternating days, restricted use on alternating days.

Topic Question 3: What factors should we consider as we update the network of park trails and consider where new trails might go?

In response to this topic question, commenters identified factors that should be considered as the network of park trails is updated. Commenters frequently suggested creating and maintaining trails that are sustainable, inclusive to all users, and well-marked. Commenters also suggested that unauthorized trails should be closed, and new designated trails should be created to replace them.

Comment Summary #1: Sustainable Trails

In response to a question regarding how the network of park trails should be updated, several commenters recommended creating sustainable trails. Commenters suggested that the National Park Service should construct trails that limit or mitigate erosion and protect the riparian corridor, as well as withstand the impact of various types of trail users.

View, grade and drainage for ease of upkeep and minimization of erosion have the greatest long term impact on continual use.

Providing trails that afford enjoyment of the river area, without damaging the riparian ecosystem is a challenge. We recommend placing most trail mileage above the 100 year flood mark.

Good trail design is essential. Trails should be constructed to mitigate erosion, withstand the impact of the type and number of users, follow topographical contours / use switchbacks as appropriate, maintain the natural state of the landscape (i.e. not be too wide, blend with the landscape), protect ecologically sensitive areas, have a balance between markers and signs for guidance and unnatural clutter.

Move trails back from the river's edge to protect the riparian corridor. Remove trails from places with nearby wetlands. Limit total trail capacity by issuing trail tags for each section of the park. Establish a horse camp in a non-karst area. Like you do with canoeing, close parts of trail if it just too soggy.

River degradation should be a big factor in all trails...hiking and multi-use. It would be nice if these two trail systems were far away from each other and far away from the rivers.

New and older trails should consider the ecology of the area, the potential for erosion, and user experiences. Trails should not be constructed if they damage natural systems or features. Hobbs State Park in Arkansas does a fine job of protecting stream crossings on their trails. This is the one location where I have seen horses and mountain bikes on the same trail without damage. But this is due to the underlying rock, which minimizes the potential for erosion. Trails need to be constructed to prevent erosion to start with and older trails may need to be re-routed in places to do that.

Comment Summary #2: Impacts from Horse Trails and River Crossings

Commenters voiced concerns about the impacts of horse trails, including river crossings, on both visitor experience and the environment. Commenters urged the National Park Service to take precautions in response to elevated levels of *Escherichia coli* (*E. coli*) bacteria found in the river that commenters attribute to horse river crossings. Some commenters expressed specific

concern regarding the impacts of horses in the designated campgrounds and on horse trails suffering from frequent use. In addition, some commenters were concerned about illegal horse trails that equestrians have created in the park.

Now our main concern that, although quieter, cause just as much destruction, if not more due to the sheer numbers of horses, is the ever multiplying usage by the horse folks of illegal trails that cause heavy erosion and eco-system damage in the form of excessive silting and equine waste in the river. The Upper Current is currently in as filthy of a condition as I've ever experienced, with water clarity never anymore the "pristine clear" that it has been in the past and the fishing quality had degrades so much that I now choose the Eleven Point or North Fork rivers as my main trout fishing streams.

You should consider limiting equestrian access on designated campgrounds. While scouting campgrounds on Oct. 11th, we observed equestrians cooling their horses on the Cedar Grove gravel bar and in designated campsites (#4 and #5). Unfortunately, the horses were defecating on the gravel bar and in the campsites. We didn't want to camp in #4 and #5 after seeing that. On Oct 12th, at the Nichols Farmstead, we observed handmade non-NPS signs (unauthorized?) that had been nailed onto trees. One of those signs indicated an unauthorized trail from the Nichols farm road through the brush to the Lower Parker School. That trail is starting to show the effects of frequent use.

We've experienced too many instances of horses being ridden through our campsite, stepping on tents urinating and defecating without the riders doing anything about it. We've seen horses "tied up" right next to our tents for illegal overnight stays and horses and their riders stopping in mid-stream, so much so, I thought I was going to run into a couple of horses and riders with my canoe two weekends ago, just about 1/3 of a mile downstream from Baptist Camp at an illegal crossing. As I had nowhere to go and couldn't stop I was lucky they moved just in time. I know the upper Current like the back of my hand having floated and wade fished it well over hundreds of times. The number of highly eroding illegal horse crossings have increased dramatically in the last 10 years. There is even an illegal horse trail that goes right through the Great Blue Heron rookery just upstream from Flying W access.

Impacts of horseback riding on the ONSR must be considered in the context of other horseback riding that contributes nutrients or sediments to the Current River and its tributaries, including illegal horseback riding in the ONSR and horseback riding outside the ONSR. As explained below, pressure from horseback riding in and near streams inhabited by Ozark hellbenders has increased substantially and may affect the amphibians by degrading the water quality of the riverways (76 Fed. Reg. at 61,967). It is also possible that horseback riding in the rivers may also directly harm or disturb hellbenders or their cover rocks.

Please reduce the number of horse trails. The area around Two Rivers, Jerk Tail and lower Jacks Fork is becoming ruined do to the overuse of horses. The upper current is now being overrun with illegal horse trails. This summer the number of illegal crossings has increased to 6 between the Baptist Camp access and Parker's Ford Access. You can no longer enjoy the Parker's access without the stench of horse manure and urine. Pinecrest Campground is now hanging signs on public and private property directing horses to their illegal trail network. Its a shame that you allow private company to profit off the parks land. I am a steam team member and have noticed a decline in the water quality at the Parker's Ford crossing. We need to protect this wonderful park that we have for future generations.

All the illegal horse trails and horse crossings should be closed and restored to native vegetation as soon as possible. The U.S. Geological Survey has confirmed that horse manure in the Jacks Fork River is responsible for dangerous levels of e. coli there. The NPS needs to crack down on this abuse of our Park.

The GMP also found 7 designated river crossings for horse trails, as well as 24 undesignated river crossings. All the undesignated river crossings should be closed immediately. The elevated levels of e. coli bacteria in the river, which is caused by horse traffic in the rivers, shows the need for quick action here.

Comment Summary #3: Scenic Views and Access to Campsites

Commenters noted the importance of scenic views while using the park trail system. In addition, commenters suggested that primitive campsites should be accessible from trails. One commenter noted that the only backcountry camping currently permitted is on gravel bars and suggested establishing campsites along new trails. This same commenter noted that a change in regulations may be needed to address this. Another commenter suggested that short distance hiking trails should be developed near the campgrounds.

All users want trails that take them to a view of nature. Whether that is a high mountain lookout or a low valley creek. It's not just how you get there but what you get to see that makes the journey a great story for others and great memories for all.

Take advantage of the terrain so that the trail system provides views of the river from the nearest ridges as well as following pathways nearer to the river.

These long distance trails imply that the park needs a change of regulation regarding backpackers. At the moment the only backcountry camping permitted is on gravel bars, not along trails. (Except in deer season where this rule seems to relax considerably.) The park can either establish campsites along the new trails or set up regulations similar to other parks like Shenandoah where backpack camping is permitted within such rules as being out of sight of the trail.

-more trail access to primitive area Owl's bend and primitive camping

The park needs at least one short distance hiking trail that begins at each campground. People like to walk, even if they came to the park primarily to float. Trails are also useful to the park's interpretive efforts to get its message communicated to the public. This is one of the very few national parks with an active interpretive program that does not (and cannot) offer interpretive hikes in the campgrounds.

Comment Summary #4: Safe for All Users

Commenters suggested that the park trails be safe for all users. Commenters suggested making trails ADA accessible and accessible for emergency transportation.

A good location for placement of handicap accessible trails would be exciting parking lots, campgrounds and picnic areas. We would suggest Cedar Gove, Ackers and Welch's Spring trail and Susie Nichols Cabin and Trail.

Accessibility for emergency transportation if necessary

Comment Summary #5: Close Unauthorized Trails and Create New Designated Trails

Commenters suggested closing unauthorized or user-created trails. Some commenters suggested converting these trails to designated trails, and others suggested that the park simply create new trails (including the proposed Current River Trail). Commenters also noted that the park's general management plan calls for closing about 5 miles of roads in primitive zones and replacing them with hiking trails. One commenter suggested that unauthorized trails are created after authorized trails get flooded and obstructed with debris and suggested that better maintenance is needed on authorized trails.

Again, I strongly urge this plan to remove unauthorized/user created trails and to try creative means of identifying and fining those creating such trails.

Are some of the "unauthorized/user-created trails" in fact trails the public had/has used for many, many years to access culturally important areas? Of so they should be designated and permanently maintained by the ONSR.

Many 'unauthorized trails' are a result of not cutting out fallen trees, cutting drainage at low spots and generally not keeping up what started as good trails. After flooding we equestrians create new trails around washed in trees and debris. Usually that shouldn't be a problem but no one comes through to cut out debris and trees for the preferred trail. The old roads are a mess. No one has cut water bars or has been concerned with erosion with the result being there is severe erosion on what could be perfectly good roads and trails. Many trail segments are a muddy mess, especially in a wet year. Scout and create new trail segments around problem areas.

Please consider the unauthorized and user-created trails known as the trails going to Susie Nichols cabin, Schafer Springs and lake to be designated as a trail, these trails has been rode for over 50 years before NPS purchased the property owned by Susie Nichols family, she rode these trails while she was alive.

The GMP calls for closing about 5 miles of roads in primitive zones, replacing them with hiking trails. That should be done immediately.

Look at some of the unauthorized trails, and if they aren't hurting anything, turn them into official trails. Also make more of an effort to educate the public that creating their own horse trails is not legal.

The GMP indicated that there were 23 miles of designated horse trail in ONSR, as well as at least 90 miles of undesignated horse trails. The GMP calls for adding 25-45 miles of designated horse trails. The 90 miles of undesignated trails should be evaluated to see if any of those miles meet standards for the new designated trail miles. All other miles which do not should be closed.

The long-proposed Current River Trail should be approved by NPS staff as soon as possible.

Comment Summary #6: Restrictions to Mitigate Impacts

Use restrictions and increased law enforcement were frequently suggested to mitigate the impacts on trails. Commenters suggested limiting both horse and unauthorized ATV use in particular areas, as well as building trails on land where hunting is prohibited. Commenters also stated that enforcement to limit use of unauthorized trails should be stronger.

Align the trails however you like, but limit horse and ATV use to particular areas. Document these areas as such, and provide the public with a way of reporting infractions.

Build the trails on land that cannot be hunted. There is too much land in the state to have to share it with hunters.

Unauthorized use or making of trails should be strictly enforced. Without enforcement, there is no control.

unauthorized ATV trails near waterways change the character of the park and need to be reigned in or restricted.

Comment Summary #7: Maintenance of Existing Trails and River Crossings

Commenters stressed the importance of maintaining existing trails and river crossings before building new trails and river crossings. Commenters noted that issues such as littering and the placement of river crossings should be addressed in the current trail system. One commenter noted that the trail from the Powder Mill Campground to Blue Spring gets overgrown and should be maintained.

First we should maintain the existing trails before building new or changing to multi-use. I spend hours and days clearing debris and removing trash from the horse trails after every storm.

Your existing trails are not maintained as is. I feel these should be taken care of before any more trails are built.

Also, I would strongly prefer that the trail from Powder Mill Campground/Owls' Bend to Blue Spring be widened a bit so that it doesn't get so overgrown in the warmer months. Once again, this doesn't affect me personally since I've visited Blue Spring enough that I don't need to see it that often. However, I often see families walking to Blue Spring on that trail through the high grass knowing that they (and their children) could be picking up ticks.

The placement of water crossings needs to be addressed. It is important to keep the crossings to a minimum but there are certain times of the year that the rivers are unsafe to cross at the designated crossing spot due to flooding or trees. It would be nice to have a couple of crossing options close together for times like this.

Topic Question 4: What factors do you think we should consider as we evaluate the existing road network?

In response to this topic question, commenters provided factors that they felt should be considered regarding the road network at the park, including safety, unauthorized roads, accessibility, access to attractions, amenities, and natural resource impacts.

Comment Summary #1: Safety

Commenters stated that the existing road network should be evaluated based on safety and security, and mentioned reasons such as preventing car break-ins, river rescues, fire and flood control, and extracting injured visitors.

Public Safety, for extracting injured visitors is hindered by limiting access

Is there a way to consider security a factor? I say this with the current situation at the Hwy DD/ Hwy 32 trail head. It is remote and cars are getting broken into with some frequency because the thief knows that the owners won't be back for several hours after parking and heading out on the trails.

Consideration should given to road access for emergency fire and flood control for user safety or rescue when required.

Minimizing blind spots near entrances to parking lots/trail heads is important due to the 'wide turn' needs discussed earlier.

When roads and trails cross I would hope that the speed limit would be reduced or good visibility for both driver and rider would be good (i.e. not just over a hill, not right by a curve) I would hope that where the trail crosses the road the road is sufficiently rough that the horses feet/shoes don't slip and slide out from under them.

Other factors are whether a road serves a useful purpose and if roads can safely accommodate vehicles, pedestrians, equestrians, and cyclists. (For example, are they wide enough for a bus hauling canoes and also someone else who is out walking or riding?)

Another argument one hears is that these roads provide access for emergency vehicles to the river for evacuation of injured parties. I've been a ranger at Ozark NSR for twenty two years before retiring and joining the local fire department as an Emergency Medical Responder. The simple fact is that this just isn't going to happen. The ambulances cannot drive on this kind of rugged narrow road. Even if they could, they'd have to proceed so slowly that the victim could be carried by boat somewhere more accessible long before the ambulance ever reached the river. In every rescue I've ever heard of, or been involved with, the victim was transported to a developed access for evacuation or airlifted by helicopter. Road access for emergency vehicles is not a legitimate argument.

Comment Summary #2: Unauthorized Roads and Enforcement/Remove Existing Roads

Commenters supported closing unauthorized roads in the park and encouraged stricter enforcement of road closures. Commenters also suggested implementing road closures detailed in previous plans, including the general management plan. Additionally, commenters suggested

closing roads that connect to private property, roads that run along the river, and any road that does not lead to a designated campsite.

Close some or all of the unauthorized access points. The road into Big Creek has had a negative impact on the area as the road has eroded in places. The area around Big Creek is heavily used by people floating the river, the additional burden of people from the road degrades the experience for everyone.

Stiffer penalties for those who drive off designated roads.

If you close a road enforce to keep it closed

The first procedure ought to be to look back at the proposed road closures from the 1990 plan that were never implemented. This would be a good start.

The NPS should also implement the recommendations in the 2014 GMP preferred alternative, to close & restore 40 miles of roads, close undesignated roads, traces, crossings, and river access points. The GMP allows closing on case by case basis without waiting and additional 2.5 years for this new Study to be completed.

Close the roads that connect to private property. I am tired of people trespassing. The funny thing is, if they would have asked, we would probably would have said yes.

I was somewhat surprised at the number of roads within the park. Both the roads on the map and the ones that are not shown. In general, I didn't see a whole lot of damage from use of the roads. My thought would be fewer roads and retaining the roads that create access points to the river itself rather than ones that run along the rivers.

In 1991, the NPS conducted a Roads and Trail Study, which concluded that Alternative 3 should be the preferred alternative- this alternative called for closing 54 "traces" that provide duplicate access and/or no identifiable NPS function. It is time to act on at data, and close these roads. The GMP explicitly allows the NPS to take action without waiting for the entire Roads and Trails Study to be complete. The NPS should act now on the recommendations made 25 years ago.

Eliminate as many vehicle roads as possible. There are more than enough official accesses to the river, the park does not need hundreds. Each road should be evaluated for other uses. If it does no environmental harm from erosion or whatever, then they can be rehabilitated and used for horse or foot trails. Otherwise close them off, replant, including with fairly large trees and boulders at regular intervals, not just at the beginnings.

The park needs to remove every road that does not go to an established campsite or river access. If they do not serve the needs of the park they should simply not exist. They simply cause trouble. The informal party spots most lead to are foci for litter, habitat destruction and incompatible park uses.

Ozark National Scenic Riverways simply has too many roads cutting into the forest. As the situation stands today, you'd be hard pressed to find a place more than a half mile from a gravel road. Roads reach the river around nearly every bend. It is not unusual at all to see pick up trucks along the river as you float down the allegedly "scenic" riverway. This intrusion on the natural scene is anything but scenic and at odds with Congressional intent in establishing the park. The park has made some

efforts to control the "viewshed" from the river, by controlling clear cuts outside the park and such, but has neglected the internal viewshed.

Such roads lead to trouble. I have cleaned up debris and litter, including things like picnic tables and cinder blocks, that could have only been brought in by vehicle and left on gravel bars and river bank camps. Some of these "auto-camps" are even mowed on a regular basis. It's hard to get a lawn mower on a boat.

They also cause erosion; these roads are typically sunken below the adjacent ground level. All that soil and gravel went somewhere, and that is downhill to the river. This siltation is bad for fish, aquatic invertebrates and the larvae and eggs of the endangered Ozark hellbender. It is also simply ugly. Ozark National SCENIC Riverways should be opposing uses that create eyesores along the riverways.

Comment Summary #3: Minimize New Roads/Improve Road Quality/Visitor Experience

Commenters indicated that the park should not create many new roads because the existing number of roads is adequate. Commenters suggested that existing roads should be maintained, and that additional roads could detract from the scenery. Additionally, commenters noted concerns regarding how motor vehicles affect their experience at the park and expressed support for preserving the viewshed and soundscape of the area.

Limit the number of roads to those designated already. This is a national park. Too much access will take away from the experience and damage the river ecosystem.

Use and maintain existing roads. Minimize building new roads

Roads are necessary, but in the context of a National Park (well, 'park like' here!) system, they should be regarded as a necessary evil. And minimized to the extent possible. It's not a Wilderness Area, but I think the 'Scenic' part of 'ONSR' is certainly diminished by roads. Let people get there, but then most of the exploring they do should be by trail or canoe.

Please minimize the visibility of roads from the river.

The ability for trailers and RV to access all roads is not necessary. Back country roads for 4x4 vehicles can also be shared with equestrians, bikers, hikers, and ATV vehicles too. But with vehicle access comes noise. So to allow but limit the amount of these type trails would allow other to still have the peace and quiet of nature.

The quality of the road will naturally attract the volume of visitors to areas that the park service wants to emphasize.

New roads should be carefully planned, existing roads should be maintained.

First, improve existing roads by creating water bars where needed and by funding enough maintenance to keep roads and trails in good condition.

To protect the cultural resources, people need to be able to get to their destinations. They will get there. You should not shut off roads, but rather maintain them better.

If there are existing roadworks that are useful keep them unless they are a huge harm to the area's resources. Keep and create roads that are useful and convenient to people and allow people to see beautiful areas, unless they are a very big harm to the area's resources. Remember that people's enjoyment and satisfaction with things is the key thing to aim for, unless there is a very significant harm to resources that is very large in scope. Think big picture with protecting resources. Ask if the trails/roads are damaging only a small, immediate area, or is it a relatively big area? And ask: how significant is the resource damage going to be for people, compared to the benefits of the road or trail?

I would like to see some of the existing roads improved, particularly those that provide access to major tourist destinations. Some examples include the dirt/gravel road to Klepzig Mill and Blue Spring on the Current River. It has been years since I've visited Bay Creek, but last I was there it could have used some improvement.

Comment Summary #4: Accessibility/Access to Attractions

Commenters stated that roads and the tram are necessary to provide access for people with disabilities and the elderly population. One commenter felt that the park does not have an obligation to provide access to all visitors in backcountry and wilderness areas. Additionally, commenters suggested that roads provide easy access to trailheads, scenic areas, historical sites, and landmarks. Some commenters suggested adding more access points to the river, while others felt that there is currently too much access.

Any area closed to motor vehicles and is walk-in only, restricts access to the physically handicapped population. They need to be reopened so this population can have access to those areas.

Seniors and handicapped are excluded when roads are closed

The Tram and possibly other roads are essential recreation for senior citizens, elderly and handicapped to enjoy this wonderful river and the surrounding environment.

Lastly, some folks often throw up a ridiculous argument about disabled access. The simple fact is that nowhere in the United States are undeveloped national park backcountry areas required to be "accessible." The Americans With Disabilities Act does not apply to the federal government in any case. The whole point of wilderness is that access is difficult, attaining places is a challenge and its own reward. There is no obligation on the part of the park to level this playing field, nor is it desirable.

The same as for trails. Easy access to parking and scenic areas, loops through scenic areas or historical sites.

Access to trail heads for horseback riding throughout the park. Large parking lots for trailer parking at trail heads. These access points could be placed along the river system to allow equine use of sections of the waterway. Equine camping in addition to the camping already available. These sites can be a distance from the rivers.

Roads close to landmarks with a short hike are good.

Directions to the trail head. Adequate parking at or near the trail head.

Parking areas to accommodate small and extra large extended vehicles.

Sufficient parking at trail heads for both day use and overnight usage (backpacking)

Reduce/ eliminate "riverside" parking- it spoils the floater experience

As a canoer, I do not like to see vehicles parked near the water. Parking lots made of pourous materials like gravel are best. An example is at Baptist Camp.

We have great river systems and access to them is hard sometimes. I would love for it to be easier.

Would like to see more river access (i.e. Martin's Bluff, Grassy)

Reduce the # of access points to the river. Have sections of the river where there are no motorized or reduce access points

Less vehicle access to the river. There are too many ways people can drive their vehicles out on gravel bars, and into the river. The river isn't a place to drive your vehicle right next to and have a party, there are plenty of other places for that. Also no new roads across the river.

There are too many roads that access the river, allowing trucks to drive onto the gravel bars, and ATVs to drive through the rivers.

Comment Summary #5: Erosion/Natural Resource Impacts

Commenters felt that roads should be improved to prevent erosion. They also suggested that wildlife and wildlife habitat, endangered species, river resources, and floodplains should be considered when developing any new roads.

Much of Ozark land is sensitive to erosion, and plants communities are fragile, so as with trails, roads should be kept to a minimum in sensitive areas.

Have roads that can sustain traffic (horse traffic) without excessive erosion

All roads should be paved to prevent erosion. Throughout this whole process erosion is a major problem.

Affect on the local environment. Proximity to sensitive areas.

Wildlife safety.

Preserving rivers as pristine waters to extent possible

Flood plains should be avoided for trail and road use.

Protect endangered species, obviously, and avoid areas of high biodiversity if they would be too delicate to put roads near.. Use pervious pavers instead of asphalt. It is more friendly to wildlife and less prone to erosion.

Comment Summary #6: Amenities and Parking

Commenters suggested amenities that they would like to see along the road network, including equestrian friendly facilities, bike lanes, increased signage, gas stations, a hardened surface, and pedestrian/bicycle facilities on bridges. Commenters also indicated support for adequate parking spaces and accommodations for large vehicles at trailheads. However, some commenters were opposed to parking near the river.

Bike lanes would be amazing. Gravel roads are also great options if they're well maintained.

The current road network and parking allows for many good trips on the river and some hiking. But trailheads are not too obvious in the park and the signage seems minimal at places. For example, the hiking trail at Pulltite is great, but not easy to find.

For equestrians, please consider road condition, parking availability, variety of trails, access to trails from campgrounds, availability of water for horses (and humans). Regarding road condition and parking availability, keep in mind that some people have quite large trailers that require wide turn radiuses. We need to be able to "swing wide" to enter and exit parking lots as well as to navigate around vehicles and other obstructions in parking lots.

Having a road network that has gas stations that accomodate bigger rigs somewhat frequently is also desired. Because we are typically driving larger trucks hauling more weight (as equestrians), we don't like to let the gas get under a half tank if possible.

Provide a hardened surface for all weather use

If the road network is going to be modified, it might be advantageous to include pedestrain/biker facilities on bridges that cross major rivers and streams. The new trail network then could share this bridge and quickly jog away from the roadway alignment after crossing.

Directions to the trail head. Adequate parking at or near the trail head.

Parking areas to accommodate small and extra large extended vehicles.

*Sufficient parking at trail heads for both day use and overnight usage (backpacking)
Reduce/ eliminate "riverside" parking- it spoils the floater experience
As a canoer, I do not like to see vehicles parked near the water. Parking lots made of pourous materials like gravel are best. An example is at Baptist Camp.*

Comment Summary #7: Improved Signage

Commenters expressed support for better signage in the park, including signs to warn visitors about dangers in upcoming road conditions.

More and better signage/ both directions

PLEASE PROVIDE PLENTIFUL AND INFORMATIVE SIGNAGE (BOTH COMING AND RETURNING) TO DIRECT PEOPLE FROM ONE VISITORS' SITE TO ANOTHER, AS WELL AS RETURN TO HIGHWAYS.

The roads need to be well maintained for trailer and vehicle traffic. If the road becomes narrow, washed out, or unsafe for trailers, small cars, etc then signage needs to be put up and the information needs to be on the parks website. As a reference in the Big Horn Mountains in Wyoming, the NPS webpage tells of different trail access points on this page it tells you when you should stop or not use at all with certain vehicles. I feel the roads are a necessary thing to give multi users easier access to our forests and also gives the four wheel riders a place to ride and stay off the trails.

Topic Question 5: Are there other considerations we should think about as we examine the park's road and trail system?

In response to this topic question, commenters suggested additional ideas for the National Park Service to consider as it develops the park's road and trail system. Commenters suggested creating additional informational signs and maps, fostering partnerships and utilizing volunteers, protecting natural and historical resources, improving trails, and increasing regulations within the park.

Comment Summary #1: Informational Signs and Maps

Commenters stated that informational signs and maps would improve visitor experience and noted that existing signs are confusing and difficult to follow. Some commenters suggested that signs could explain the unique ecosystem and history of the park and clearly identify park rules and regulations. One commenter suggested providing interpretive Civil War signs throughout the park.

It would be nice to see more informational signs, not only telling visitors proper etiquette and rules but why the area is important/special, its unique ecosystems or history, etc.

User friendly signage and mapping of the roads and trail system, also helps with compliance, enjoyment and reduced conflicts

Lastly, although I realize the short "shelf life" of posted signage is a real problem, more signage with simple English explanations of park rules and regs might go a long way toward improving better behavior by park visitors.

Trails should be well marked, especially at junctions with other trails or other roads. The east side of the Devils Well trail crosses and follows many old roads, and it can be confusing. One consideration on trail usage is the number of each type of user.

Using the existing road and trail system, determine outstanding destinations within the park. Use park maps to help the park users to navigate the trail system to experience the natural beauty and wonders of the park, as well as the old landmarks and historical sites of yesteryear.

Have interpretation at Tan-Vat -Upper Current fir the Civil War and for the Trail of Tears National Historic Trail. Also have signs along the Current River where the Union Troops traveled from Sinkin Creek south on the Current toward Chilton Mill and possible signs along the Upper part of the Current River about the activities of the Union Troops.

Signs showing who can use the trail (instead of who can't)

Install trail markers and signage along the way, so casual visitors feel more confident in taking a trail. For example, use "3Ds" distance, difficulty and direction markers periodically, so they know what they're getting into, and so even when the leaves are covering the trail, people can still find their way out.

Since numerous undesignated trails cross boundary lines between the park and private land it is suggested that small signage be used to warn trail users that they are leaving the park and trespassing on private land.

Comment Summary #2: Volunteers and Partnerships

Commenters suggested establishing partnerships with non-profits and other organizations whose members use the park. Commenters also recommended providing volunteer opportunities to members of the community, including semi-annual river cleanups and trail maintenance.

Also consider creating some type of a partner program with end users such as myself in all the communities (bikers, hikers, equestrians, campers) that can be trail advocates and help with trail maintenance as well as trail communication. Use the power of social media and crowd-sourcing to strengthen the trail network!

The updated Ozark National Scenic Riverways (ONSR) General Management Plan (GMP) calls on the National Park Service (NPS) to partner with other non-profits to benefit the Park. I would advocate the continuation of the partnership with Sierra Club, L.A.D., etc. to help with trail maintenance near the Current River.

Conduct semi-annual cleanups of the river and haul out the trash and recyclables.

Take advantage of volunteer resources already available, support those organizations with education and tools, and encourage more people to volunteer. Too many people are under the impression that our trails build themselves... This is not something the NPS can do alone.

Comment Summary #3: Education

Commenters recommended educating park users about proper trail use, noting that visitors should be educated about the proper disposal of waste and keeping trails free of horse manure. Commenters recommended educating visitors through programs sponsored by user organizations and by providing easy access to information about trail use and events.

Trail use education. Closing trails when trail conditions are wet is important to long term use of the trail as well as safety. Keeping trails free of all litter including horse manure on horse approved trails. If you pack it in then pack it out.

Educate park users about proper disposal of waste, before being allowed on the river. We needed to watch films about safety and waste management before getting a permit and being able to go into the Boundary Water Canoe Area. The same was required to get a permit to enter the Grand Canyon.

A cultural shift towards acceptable and proper usage of the NSR needs to occur. Like with other shifts in societal behavior (no smoking, recycling) the biggest strides are to be made with the youth and what they learn in school.

Shared trails can be an issue, especially when not all user groups contribute to maintenance. Making sure trail maintenance days are well-publicized would bring more awareness to the various user groups in how they contribute to damaging trails.

A program to teach about trail etiquette, with organization that use trial. IE our Mountain Bike Camp teaching trail etiquette

It also helps if major events are posted well ahead of time at the access points and online so that bike riders know there is a big horse ride happening and Vice versa. This prevents frustration and allows each to find alternate trails before making a trip.

Education of all user groups on how to interact on the trail will ease concerns of some users and allow better understanding of the needs of all trail users.

Comment Summary #4: Keeping the Park a Natural Experience and Providing a Sense of Wilderness

Commenters stressed the importance of maintaining a natural experience and a feeling of wilderness in the park. One commenter suggested limiting lighting in the park to protect the natural night skies.

NPS is the most pristine left - we would not have the tourism economy without it. Fight to keep it pristine, please. There is National Forest Area all around it; plenty of area for people to ride horses and bikes. Believe it or not, I am a horse person and love horses, but I learned early in life to keep them away from springs, creeks and rivers except to drink.

As a canoe and hiker, I appreciate the feeling of wilderness. It is surprising to find a car near a river bank, or motor boat on the water. For me, retaining a sense of wilderness is important.

Limit lighting / use smart lighting to protect natural night skies on roads and parking lots in developed areas. No lighting in natural and primitive areas.

Comment Summary #5: New Facilities and Infrastructure

Commenters recommended building new facilities and infrastructure in the park, including building better toilet facilities and resources for visitors to learn about the park such as a natural history museum. Some commenters suggested improvements in infrastructure, including extending the tram and constructing ADA-compliant sidewalks.

At key locations concrete vault toilets are needed. Those locations are where pumper trucks can get to and should be located to serve everyone including floaters. As an equestrian it is extremely gross to ride a trail to a river crossing through a field of human waste. There is too much trash along trails. Hire maintenance workers willing to pick up trash and create a program to allow trail users to do the job....

A visitors Center with a Museum of Natural History Including Ice Age Animals (especially Predators), its People, and Ecology Education.

I often ride the old tram from van buren to chilton. would be nice if it were extended. nice, scenic ride.

If you could include a museum such as what you started to have at Acres Ferry, you can include more about how to treat the land while riding, floating and hiking. Perhaps include a store in it as well for hikers and riders. Encourage trail manners and keep it as is as much as possible.

I recommend ADA sidewalks at the Alley Spring park. New ADA sidewalk from the parking lot to the main Alley pavilion. Then a sidewalk from the Alley pavilion to the restrooms. Handicap parking off 106 at the Alley Pavillion with a side walk made down to the pavillion. I would also like to see the Overlook trail made ADA accessible. It could be made wider and paved to accomodate manual or motorized wheelchairs.

Comment Summary #6: Protection of Natural and Historical Resources

Commenters expressed the importance of protecting the natural and historical resources in the park. In addition, commenters stated that the preservation of biodiversity in the park should be a priority, including protecting species like the Ozark hellbender. Commenters noted that increased sediment in rivers pose a major threat to the Ozark hellbender, and that erosion and the degradation of water quality attributable to roads and trails contribute to the decline of this species. One commenter noted that monitoring invasive species such as knapweed also should be a priority.

For the reasons explained below, the Center asks the National Park Service (“NPS”) to prioritize the preservation and recovery of the Ozark hellbender as it goes through its roads and trails planning process. Prior to considering management plan alternatives in this process the NPS should first analyze its activities occurring under its current RTMP to determine the existing effects on the Ozark hellbender and other sensitive species.

Always prioritize land and habitat sustainability, biodiversity and bird/wildlife survival needs before human recreational desires.

I would just like to stress that the ONSR is a unique and valuable park resource and should be given as much protection from overuse by humans and horses as possible.

The preservation of the habitat of endangered animals, including the Ozark hellbenders' habitat needs to be of highest importance. The public needs to have the opportunity to know that these animals are being protected.

I am writing to ask that you prioritize the preservation and recovery of the endangered Ozark hellbender in your Roads and Trails Management Planning. Ozark hellbenders are habitat specialists in the Ozark's rivers, highly dependent on good water quality, and are thus critically affected by roads and trails that cross over or are adjacent to rivers and streams in the Ozark National Scenic Riverways.

Increased sediment in rivers is a major threat to hellbenders, as it can suffocate their eggs, eliminate habitat, destroy water quality and reduce prey. The impacts of horseback riding are of particular concern, as riding is extensive in and near the Riverways and damages hellbender habitat.

Any new roads and trails considered on the Riverways must be analyzed for impacts to the Ozark hellbender and designed to avoid any potential erosion and any increase in sedimentation or horse waste. Currently existing roads and trails must also be analyzed, with trail closure and rehabilitation for sites affecting Ozark hellbenders and limitations imposed on the size and number of large commercial horseback rides allowed in the park.

Most importantly, try to restore the river to how it was 10-15 years ago. Keep the 4-wheelers and horses out of the river and the adjacent area.

Yes, is anyone concerned about invasives? You have spotted knapweed growing in your maintenance yard at Cedar Grove. Any gravel or fill taken from this yard will now spread the invasive to where you haul the material. Cedar Grove and other areas are loaded with locust trees. You need to make war on those trees or they will take over.

Please manage it with preservation of its natural and historic values as the primary mission.

Comment Summary #7: Improve Campsites, Parking Lots, and Trails

Commenters suggested making improvements to the park, including adding electricity, water, and fire rings to campsites; making parking lots more accessible and sustainable; and adding pump wells and trash cans to trails.

Might consider camping areas with electric and water.

Back country camp sights w/fire rings.

I've noticed in some parks that equestrian parking is taken over completely by other groups. Equestrians cannot just park anywhere, so make sure these areas have good indicators.

I encourage the use of porous or permeable pavement construction techniques for parking lots, pull-offs, trailheads, and maybe even road shoulders and side-roads, etc., instead of hard-packed gravel, asphalt or concrete. This allows precipitation to infiltrate and recharge the groundwater, while minimizing erosion and siltation that can typically occur from channeling drainage from large areas like parking lots.

I don't know how practical it might be but I wondered if it was possible to put in a pump well every 20 or so miles. I say this because there are many (from what I've seen) that go on long hikes or long mountain bike trips and something like this along the trail system could be so valuable to those desiring an epic / possibly multi-day experience.

Start mowing and picking up trash again. I saw the pile of trash cans that you all took out of all the camping/recreational areas and just smashed up. Sure that saves money picking up trash, but does it really help the park or the users? That was really a bad idea and does not achieve the goals of the park.

I encourage drinking water access at all possible trailheads, along with trash cans & recycling cans, air pumps, and restrooms if possible.

Purpose and Need: Planning Process and Policy

Under the planning process and policy code, commenters suggested ways to improve the planning process, including public involvement, public meeting locations, and the timeline of the plan.

Comment Summary #1: Public Involvement

Commenters suggested ways to improve public involvement during the planning process, including creating a small committee of local users, providing the public with a copy of comments from prior public meetings, maintaining contact with interested individuals via email, and holding meetings in areas farther away from the park to include a larger portion of the public (such as Springfield, Columbia, St. Louis, and Kansas City).

Have a committee of 12-14 people who use the roads.

Provide a copy of comments from prior public meetings

Just try to keep emailing up

When holding events such as the open houses held in October 2015, the NPS should include additional metro areas such as Springfield, Columbia, St. Louis, and Kansas City, even Chicago, to allow wider participation. The NPS has already identified the population centers having interested park visitors (see "Ozark National Scenic Riverways Public Comments on Preliminary, Alternatives Newsletter #3, Response Density by Zip Code). Holding public involvement meetings in those population centers would allow more park visitors to participate in the process.

Comment Summary #2: Planning Process

One commenter questioned the logistics of this plan and asked from where the funding and manpower will be provided.

Where is the budget.

Where is the equipment to build or maintain or the people to use the equipment?

Is this just another on the projects that is actually not funded?

Consultation and Coordination: General Comments

Commenters suggested different agencies and organizations to consult with during the development of this plan/environmental assessment, including examples of successful road and trail networks elsewhere.

Comment Summary #1: Working with Other Organizations/Requests to be Involved

Commenters suggested that the park consult with other agencies and organizations during the development of this plan/EA, specifically local mountain biking and horseback riding organizations, non-profit organizations, local users of the roads and trails, and adjacent landowners. Additionally, some commenters expressed interest in being involved in activities such as mapping, maintaining access for utility suppliers, and identifying needs.

Consult with local, state and national hiking/biking organizations such as Missouri Bicycle and Pedestrian Federation and Adventure Cycling (a national advocacy organization for bicycle trails).

The mountain biking community in Missouri, especially GORC, has a stellar record of cooperation and stewardship with multi-use trails. Many multi-use trails have been constructed and are maintained by the mountain biking community (GORC), which are enjoyed by hikers and equestrians. This record should be considered as a example of how to foster cooperation and avoid conflict.

Consider consulting with IMBA, or experienced mountain bikers to help assess existing trails and share said knowledge with NPS staff before deciding fate of each existing trail, and which user will be on these trails. As well, consult with IMBA or another professional trail building organization to help with conceptual design and master planning, especially with 'new' mt bike trails.

NPS has qualified staff regionally and nationally to support this effort. Maybe some input from locals who 'use' these roads would help.

In order for you to consider "new and updated trail" placement you need to include the Back Country Horsemen of America and each local chapter. These horsemen know the land and have more experience in creating and maintaining trails than the Park Service.

The only other consideration you might ponder, if you don't do so already, is how to improve partnerships with the surrounding federal, state, local, and private (Pioneer Forest) landowners to better manage these precious resources entrusted to your protection.

Please consider utilizing IMBA's service as far as trail recon, mapping, and consultation for existing trails and any new trail development. IMBA is a non-profit advocacy group with field staff willing to help with this project.

We would like to work with the ONSR on any road/trail closings that impact access to our facilities within ONSR property.

Often the lines that run on ONSR property continue on to serve other members in the area as well as ONSR facilities.

If the road/trail is to be closed and gated then we would request being able to put one of our locks in the chain. This will ensure that we can restore power to ONSR and other members in the most efficient way possible as often it is in the middle of the night and during the worst weather conditions.

As this study progresses, we particular ask that we be viewed as partners in identifying needs. This is based on decades of visiting the backcountry in the course of our work. Few other park partners know the backcountry of the park as well as CRF.

Comment Summary #2: Examples of Other Road and Trail Networks

Commenters suggested looking at road and trail networks at other recreational areas as successful examples. Suggested examples include: Warsaw, Missouri; Rocky Mountain National Park; Hobbs State Park, Bentonville, Arkansas; Greensfielder Park; Brown County State Park, St. Charles County; Truman Lake Mountain Bike Park; Two Rivers Mountain Bike Park; Landahl Park; Blue River Parkway Trails; Swope Park Trails; Berryman Trail in the Mark Trail National Forest; Council Bluff Recreation Area; Crowder State Park; Castlewood State Park; Rock Bridge Memorial State Park; and Poosey Conservation Area.

A good example of this can be seen in Warsaw, Mo., where a nice network of trails has been built using federal lands managed by the Corps of Engineers.

RMNP is a great place to Study as far as trails, imagine that with multi-use availability and you have a great place.

Study several successful mountain biking trail systems across Missouri in similar natural areas to create a blueprint for success in ONSR, including:

Truman Lake Mountain Bike Park in Warsaw

Two Rivers Mountain Bike Park in Highlandville

Landahl Park in Blue Springs

Blue River Parkway Trails

Swope Park Trails

Berryman Trail in the Mark Trail National Forest

Council Bluff Recreation Area

Many state parks and state recreation areas, including Crowder State Park, Castlewood State Park, Rock Bridge Memorial State Park, and Poosey Conservation Area

A good example being the trail system in St. Charles County which is a very well done multi use trail system. I just returned from a trip to Brown County State Park in Indiana and they have separate trails for Mountain bikers and equestrian users. Hikers are allowed on all trails. This is a fantastic trail system with some of the best trails in the Midwest and would be a worthy model to follow. It is becoming a destination point and from the number of people I observed it has provided quite an

economic boost for nearby Nashville, Indiana. Paved sections of trail for handicap access should be considered as well.

Again, an example is Hobbs State Park near Rogers, AR.

Trails should be purpose-built. Other examples around the country should be studied and used as examples. We are blessed with an abundance of potential. Bentonville, Arkansas provides great examples of purpose-built trail systems.

Greensfielder Park in Saint Louis County has been a model for multi use trails that work. At each trail head signs are posted with a diagram for how to respect and share the trail with each other.

Comment Summary #3: Consultation Requirements

One commenter (the Center for Biological Diversity) stated that the park must engage in formal consultation with the U.S. Fish and Wildlife Service and should receive a “biological opinion” regarding the impact on the Ozark Hellbender.

The NPS should also engage in consultation, under Section 7 of the Endangered Species Act (“ESA”), with the U.S. Fish and Wildlife Service, to ensure that its plan will ensure against jeopardy, as well as contribute to the recovery of the Ozark hellbender.

To complete formal consultation, the FWS must provide the NPS with a “biological opinion” explaining how the proposed action will affect the listed species or habitat. 16 U.S.C. § 1536(b); 50 C.F.R. § 402.14. Consultation must generally be completed within 90 days from the date on which consultation is initiated. 16 U.S.C. § 1536(b)(1)(A); 50 C.F.R. § 402.14(e).

If the FWS concludes that the proposed action “will jeopardize the continued existence” of a listed species, the biological opinion must outline “reasonable and prudent alternatives.” 16 U.S.C. § 1536(b)(3)(A). If the biological opinion concludes that the action is not likely to jeopardize the continued existence of a listed species, and will not result in the destruction or adverse modification of critical habitat, the FWS must provide an “incidental take statement,” specifying the amount or extent of such incidental taking on the listed species, any “reasonable and prudent measures” that the FWS considers necessary or appropriate to minimize such impact, and setting forth the “terms and conditions” that must be complied with by the NPS to implement those measures. 16 U.S.C. § 1536(b)(4); 50 C.F.R. § 402.14(i). Taking of listed species without the coverage of an incidental take statement is a violation of Section 9 of the ESA. 16 U.S.C. § 1538.

References: General Comments

Commenters referred to various sources of information that the National Park Service should consider when developing the Roads and Trails Management Plan/Environmental Assessment. Suggestions include *Equestrian Trail Guidelines for Construction and Maintenance* by Kyle Tabor, and other successful mountain biking trail systems in Missouri.

Comment Summary #1: Equestrian Trail and Mountain Biking References

Commenters suggested implementing the suggestions in Kyle Tabor's report called "Equestrian Trail Guidelines for Construction and Maintenance" from 2007. One commenter suggested studying other successful mountain biking trail systems across Missouri in similar natural areas. The commenter provided examples of these trail systems.

*In a world where money was not an issue, I would like to see a world class trail built according to the guidelines in Tabor's 2007 publication *Equestrian Trail Guidelines from Montauk to Two Rivers* (or even further.could be hooked up with the Ozark Trail past there). In the best of all possible worlds, this would be a multi-use trail that hikers, bikers and riders could use, but that would require a totally new trail since the existing trails require crossing the river and that's pretty hard to do if you're hiking.*

If new trails are developed, the recommendations in the report done in 2007 by Tabor et al should be followed.

Study several successful mountain biking trail systems across Missouri in similar natural areas to create a blueprint for success in ONSR, including:

Truman Lake Mountain Bike Park in Warsaw

Two Rivers Mountain Bike Park in Highlandville

Landahl Park in Blue Springs

Blue River Parkway Trails

Swope Park Trails

Berryman Trail in the Mark Trail National Forest

Council Bluff Recreation Area

Many state parks and state recreation areas, including Crowder State Park, Castlewood State Park, Rock Bridge Memorial State Park, and Poosey Conservation Area

(List your favorite mountain biking areas that may be a good model for what ONSR's mountain biking opportunities could look like.)

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**APPENDIX A: CORRESPONDENCES FROM ALL ENTITIES
(GOVERNMENT, ORGANIZATIONS, BUSINESSES, ETC.),
EXCLUDING THOSE FROM INDIVIDUAL COMMENTERS**

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 19

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Correspondence Text

Topic Question 1:
More trails, access to the trails, and amenities on and near the trails.

Topic Question 2:
Multi-use trails are only good if there are set rules that are enforced. For instance, not allowing horses on the trail during muddy periods where trail damage can occur. Hikers and mountain bikers are priority.

Topic Question 3:
Amenities along the route as well as scenic routes and also routes that could have the potential to expand again some day.

Topic Question 4:
Does existing roadway have proper bicycle and pedestrian infrastructure to allow for safe and easy access to and from trails? People shouldn't be required to drive to get to these places.

Topic Question 5:
The best parks are easily traversed by foot or by bike. Hit those points.

Comments:

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 250

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Topic Question 1:

More foot trails. We note heavy use at the Powder Mill trailhead. Loop trails should be expanded allowing for better experiences. The experience at Powder Mill shows us that visitors will utilize trailheads that are associated with major use areas which are perceived as safe places to leave vehicles. There exists a great need for a trail beginning at Round Spring and going to Akers, utilizing the west side of the river. Shorter trails could easily be constructed at several of the use areas, giving campers a greater diversity of experiences without having to drive to another locale. Several old, even historic, trails should be rehabbed for use.

Topic Question 2:

While it sounds like a good idea, the reality is that horse trails do not mix all that well with hikers or bikers. Mountain biking is something best limited to backcountry gravel roads, which there are plenty of. If some roads were closed, these could theoretically be utilized for all purposes because the old road beds are wide enough to contain different types of traffic. A mixture of types can be accomplished as elsewhere, although both horses and bikes do create a considerable amount of resource damage.

Topic Question 3:

First priority should be on identifying, for closure, roads and traces that are causing degradation of visitor experience and the loss of resources. Then analyze how these road beds could best be utilized for alternative forms of recreation. In this way, the park can create new horse, bike, and foot trails utilizing old roads. The added benefit in this is that the act of creating new trails, in itself, takes time, money, and causes some unavoidable resource damage; utilizing old roadbeds for this purpose has been successfully done at Buffalo NR and Mammoth Cave NP. In this way, almost immediately NPS can

add new trails, while minimizing costs, compliance paperwork, and resource damage. Second priority should be on creating connecting trail systems to allow for a variety of trip lengths. The construction of totally new trails should be done only when existing trails or roads cannot be repurposed.

Topic Question 4:

The first procedure ought to be to look back at the proposed road closures from the 1990 plan that were never implemented. This would be a good start.

Secondly, examine threats to cultural and natural resources such as the visitation to caves harboring endangered species and other species of conservation concern. This would include threats to hellbenders from fords in rivers.

Thirdly, look at the development of impromptu campsites and river accesses that have since been condoned or codified. Sites that quickly come to mind include Bacher Landing (Round Blue Hole), Bee Bluff (Current River), Roberts Field, Broadfoot (goes on for a mile of riverfront), Bay Creek, Lipps Hole, or just upstream of Two Rivers on the Current.

Topic Question 5:

The important consideration ought to be the enabling legislation which states that the prime purpose for establishing the park as "...conserving and interpreting unique scenic and other natural values and objects of historic interest..." It can well be argued that those values are at risk by the non-traditional and non-historic development of unauthorized roads, trails, and backcountry use areas.

In January of 1985, I wrote Superintendent Art Sullivan the following: "It is becoming increasingly apparent that unless steps are soon taken, much of the primitive qualities will be lost. Of extreme concern is the problems generated by vehicular traffic encroaching on every area. We have noted a marked increase in the use of some camping areas which used to be mostly inaccessible to vehicles. As vehicular camping increased, the quality of such campsites decreased." That was thirty years ago and the problem keeps getting worse.

Comments: Dear Reader:

Thank you for giving us the opportunity to offer our scoping comments for the upcoming roads and trails study. In the years we have worked in the park we have become increasingly concerned about these issues. Since the park's establishment we have watched as more and more drivable roads accessed the river with attendant loss of those values for which the park was established.

As this study progresses, we particular ask that we be viewed as partners in identifying needs. This is based on decades of visiting the backcountry in the course of our work. Few other park partners know the backcountry of the park as well as CRF.

Most of the visitor experience and natural resource management problems we have noted are directly related to the development of roads. What was a trace in 1970 is now a road that trailers can be pulled down, ATV used has blossomed, and serendipitous horse trails appear like magic.

In short, many areas that were once remote and rustic have become campgrounds, access areas, and fords. The view-shed from the river has greatly declined in quality and the river experience now includes viewing squatter camps, trailers, and RV's even on the beaches.

Caves have been impacted, including ARPA violations, and even instances of off-road vehicles being driven into caves (Bay Branch Arch Cave, for example). Natural areas such as the Jacks Fork NA (Jam-Up Cave) have been degraded by ORV traffic.

We hope that this present study will be effective and lead to a re-establishment of those values which led to the establishment of America's first National Park Service unit created to protect a river system. Again, we offer our help in evaluating the roads and trails situation in the park.
Sincerely,

Scott House
Ozarks Operation Manager
Cave Research Foundation

">

PEPC Project ID: 56591, DocumentID: 68296
Correspondence: 261

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Correspondence Text

November 25, 2015

Submitted Online

Ozark National Scenic Riverways
Roads and Trails Planning Team
404 Watercress Drive
P.O. Box 490
Van Buren, MO 63965

Re: Scoping Comments on the Roads and Trails Management Plan for the Ozark National Scenic Riverways

I submit the following scoping comments for the Roads and Trails Management Plan ("RTMP") for the Ozark National Scenic Riverways ("ONSR") on behalf of the Center for Biological Diversity ("Center"). The Center is a national, nonprofit organization with over 900,000 members and online activists whose mission is to protect and restore endangered species and their habitats through science, policy, education, advocacy, and environmental law. The Center and its members are concerned with the conservation of imperiled species, including the endangered Ozark hellbender.

For the reasons explained below, the Center asks the National Park Service ("NPS") to prioritize the

preservation and recovery of the Ozark hellbender as it goes through its roads and trails planning process. Prior to considering management plan alternatives in this process the NPS should first analyze its activities occurring under its current RTMP to determine the existing effects on the Ozark hellbender and other sensitive species. The NPS should also engage in consultation, under Section 7 of the Endangered Species Act ("ESA"), with the U.S. Fish and Wildlife Service, to ensure that its plan will ensure against jeopardy, as well as contribute to the recovery of the Ozark hellbender.

I. ONSR's Prime Recreational Waters

The Ozark National Scenic Riverways was established in 1964 as the nation's first federally-protected national river. The park extends along 134 miles (approximately 80,000 acres) of the free-flowing Current River and one of its tributaries, the Jacks Fork, in the Ozark Highlands of southeastern Missouri.

The Current River and Jacks Fork are prime recreational waters attracting approximately 1.5 million visitors each year. A 2011 study estimated visitor spending at more than 55 million dollars with nearly 90 percent of spending from non-local visitors. Because of this spending and employment by the NPS, the ONSR has generated 845 jobs, which is approximately 15 percent of the total employment in Shannon and Carter counties. Accordingly, maintaining water quality is important for the local economy that depends on these waterways for recreational uses, such as boating, fishing, and floating.

As a unit of the National Park System, management of the ONSR must ensure protection of the Park's resources in an unimpaired condition for public recreation, education, and scientific value.

II. Status of Ozark Hellbenders in the ONSR

Ozark Hellbenders are endemic to the White River drainage in northern Arkansas and southern Missouri. Hellbenders are habitat specialists that depend on consistent levels of dissolved oxygen, temperature, and flow. See U.S. Fish and Wildlife Service, Endangered Status for the Ozark Hellbender Salamander, 76 Fed. Reg. 61956, 61,957 (Oct. 6, 2011).

Evidence indicates Ozark Hellbenders are declining throughout their range, and no populations appear to be stable (76 Fed. Reg. at 61,958). Likely less than 600 Ozark hellbenders remain, and the U.S. Fish and Wildlife Service listed the Ozark hellbender as endangered in October of 2011. 76 Fed. Reg. 61956 (Oct. 6, 2011).

Historically, Ozark hellbenders could be found in portions of the Spring, White, Black, Eleven Point, and Current Rivers and their tributaries (North Fork White River, Bryant Creek, and Jacks Fork) (76 Fed. Reg. at 61,958). Currently, Ozark Hellbender populations are known to occur in Bryant Creek, North Fork of the White River, Eleven Point River, and Current River, with some individuals possibly still present in the White River, Spring River, and Jacks Fork (USFWS 2012).

In the Current River, which flows through the ONSR, it has been estimated that 80 hellbenders remain (76 Fed. Reg. at 61,960). Scientists documented Ozark hellbenders in Jacks Fork, a tributary of the Current River that flows through the ONSR, in 1992. But no hellbenders were found during investigations of Jacks Fork in 2003 nor were any found in 2006 during 7 person-hours of searching (76 Fed. Reg. at 61,960).

III. Planning Documents for Park Management

Every park in the national park system is required by law to have a current general management plan. The ONSR's last plan was done more than 25 years ago, in 1984. The 1984 General Management Plan ("GMP") authorizes numerous activities on the ONSR (NPS 1984). The plan called for a more detailed study of river access sites and of other roads, traces, and horse trails in the riparian corridor (Flader 2011). These studies resulted in a river management plan issued in 1989 (NPS 1989) and a roads and trails study issued in 1991 (NPS 1991). Along with the annually issued Supervisor's Compendium, these documents authorize ongoing activities on the ONSR, for example, by setting maximum use limits for canoe use, setting horsepower limits for motorboats in some areas, identifying areas on the Current River and Jacks Fork where boats can be launched, and designating which roads are open for travel.

In 2006, the NPS began the process of developing a new plan for the ONSR. On March 8, 2013, the NPS provided the FWS with the draft revised GMP and Draft Environmental Impact Statement ("EIS"). As a result of this analysis, the NPS initially concluded that the revised GMP "may affect, but not likely to adversely affect" the Ozark hellbender, Indian bat and gray bat. See Memorandum dated March 18, 2013 from Bill Black, Superintendent, Ozark National Scenic Riverways, to Amy Salveter, Field Supervisor, U.S. Fish and Wildlife Service.

In a letter dated April 25, 2013, the FWS explained that it could not concur with the NPS's determination. The FWS recommended that NPS conduct "a programmatic consultation in which effects from all actions occurring within the park are evaluated." See Memorandum dated April 25, 2013 from Amy Salveter, Field Supervisor, U.S. Fish and Wildlife Service to Bill Black, Superintendent, Ozark National Scenic Riverways.

On November 8, 2013, the NPS released the draft GMP, and the Final General Management Plan/Environmental Impact Statement was released on December 12, 2014.

IV. Roads and Trails Management at ONSR Affects the Endangered Ozark Hellbender

The Ozark hellbender is primarily affected by water quality, including sedimentation and nutrient loads. As such, any activities on the ONSR that impact water quality may in turn impact the salamander and its habitats. Ongoing activities near or on the riverways of the ONSR that deposit sediment or nutrient loads in waterways include: use of the road and trail system and recreational activities (such as boating, ATV use, and horseback riding). 76 Fed. Reg. 61,966. These activities in the rivers may also directly harm or disturb hellbenders or their cover rocks.

Studies conducted by the USGS (Barks 1978), NPS and the Missouri Department of Natural Resources (1998) have suggested that "heavy recreation use is causing adverse impacts on the water quality of the Jacks Fork River, including elevated fecal coliform bacteria densities that exceed the standard for whole body contact recreation" (Vana-Miller 2007). Indeed, in May 2011, ONSR was identified as one of America's ten most endangered rivers due to inadequate management by the NPS (American Rivers 2011).

Dirt and gravel roads within the Ozarks in general are the largest source of sediments to streams, outweighing the combined impacts of pasture erosion, logging, and natural erosion (Vana-Miller 2007, citing USDA 1986). Heavily used gravel roads can contribute 100 times more sediment than paved or

abandoned roads (Reid and Dunne 1984). Roads can cause marginally stable slopes to fail, and they can capture surface runoff and channel it directly into streams resulting in increased sediment deposition (Allan 1995). The 1991 NPS study of roads and trails found that the existing system of roads results in "substantial sediment loading to small creeks that empty into the Jacks Fork and Current Rivers," which reduces water quality and adversely impacts riparian vegetation (NPS 1991).

Over 130 motorized vehicular river-access points exist on the ONSR, according to a 2007 analysis (Friends of the Ozark Riverways 2010). Virtually all gravel bars (used for canoe and boat camping) are accessed by all-terrain vehicles (ATVs) and other motorized vehicles (American Rivers 2011). ORV activity also increases erosion and sedimentation by exposing bare erodible soils in areas with frequent activity. ORVs frequently cross rivers inhabited by hellbenders and are driven in riverbeds where the water is shallow enough to enable this form of recreation. ORV use in the riverways could also directly impact hellbenders, as well as displace cover rocks (76 Fed. Reg. 61,967). Horseback riding near or in the riverways can also increase sedimentation and nutrient loads and reduce available dissolved oxygen, as explained in detail below.

The practice of removing large rocks and boulders to reduce damage to canoes is common on many hellbender streams (76 Fed. Reg. 61,967). The areas under these large rocks are important habitat for cover and nest sites; therefore, overturning or removing these rocks can diminish available cover and nest sites for hellbenders. The force delivered by a boat hitting a rock could easily injure or kill a hellbender, in addition to displacing or disrupting cover rocks (76 Fed. Reg. 61,967). Indeed, hellbenders encountered with gashes in their heads suggest that watercraft traffic likely impacts these animals (76 Fed. Reg. 61,966). The NPS has found that "increased use of jet boats has created a more constant level of disturbance to aquatic and riparian animals as well as physical disturbance to bank and bottom substrates" (Vana-Miller 2007).

V. Horseback Riding Near and in Rivers Causes Adverse Impacts to the Ozark Hellbender

Impacts of horseback riding on the ONSR must be considered in the context of other horseback riding that contributes nutrients or sediments to the Current River and its tributaries, including illegal horseback riding in the ONSR and horseback riding outside the ONSR. As explained below, pressure from horseback riding in and near streams inhabited by Ozark hellbenders has increased substantially and may affect the amphibians by degrading the water quality of the riverways (76 Fed. Reg. at 61,967). It is also possible that horseback riding in the rivers may also directly harm or disturb hellbenders or their cover rocks.

A. Extent of Horseback Riding

Horseback riding in and near the ONSR is extensive. Currently, through an annually issued Supervisor's Compendium, NPS authorizes horseback riding by the public on unpaved state and county roads and four designated horse trails with designated river crossings. Within the ONSR, there are five designated river crossings on the Current River and two designated river crossings on Jacks Fork. The 2015 Supervisor's Compendium was approved on May 8, 2015, and is effective for one year. Supervisor's Compendium, http://www.nps.gov/ozar/learn/management/upload/OZAR-Supt-Com_Signed-050815.pdf (last visited Nov. 25, 2015).

The four designated horse trails in the ONSR total approximately 25.5 miles (<http://www.nps.gov/ozar/planyourvisit/horseback-riding.htm>). Even just considering the four

designated horse trails on the ONSR, there are several miles of trail where the proximity to the riverways would allow runoff of nutrients from horse waste or sedimentation through soil erosion.

Yet this only accounts for a fraction of miles of the available horseback riding routes because the NPS allows unlimited horse use of unpaved state and county roads. A 2000 analysis led by NPS found that within the 56-mile stretch of the Current from the upstream boundary to Goose Bay, there were 51 miles of horse trail running parallel to the river and on the flood plain, 83 percent of which were used exclusively for horse riding (Fenders 2011). There were nearly 30 miles of additional flood plain trail in other sections, in addition to numerous trails on higher ground (Fenders 2011). These trails include more than 80 places where horses cross the rivers and harm water quality with erosion and fecal coliform pollution (Fenders 2011). Moreover, when the water is low, many people use the river as a trail, riding along the river's edge.

In addition, the NPS authorizes commercial horseback riding operations through annual issuance of Commercial Use Authorizations ("CUAs"). For example, on July 26, 2012, the NPS authorized Trail Ride Guides LLC (aka Cross Country Trail Rides) to use the Two Rivers confluence area of ONSR from Jerktail to below Two Rivers and up the Jacks Fork to the Alley Mill area. This essentially amounts to the entire designated horse trail system on the ONSR. On November 2, 2012, Trail Ride Guides LLC reported that it served approximately 10,000 clients and took about 20 trips in the ONSR that year, utilizing three designated horse trails: Broadfoot Loop, Jerktail Loop, and Shawnee Loop. Although the Commercial Use Authorizations limit group size for guided rides to 25, it is not uncommon to observe groups with several dozens of horses on unpaved roads and trails near and on the ONSR.

To illustrate the demand for horseback riding in the area, consider that Trail Ride Guides LLC, which is located on the banks of Jacks Fork, boasts over 3000 horse stalls (<http://crosscountrytrailrides.com/general-info/>). At one study site on the Jacks Fork, observers documented up to 500 horses crossing per hour (Davis and Richards 2002).

A 1991 NPS study of roads and trails found that about 95 percent of horse use in the ONSR is attributable to the large organized multi-day trail rides, such as those held by Trail Ride Guides LLC (NPS 1991). That study suggested that the NPS consider restricting the total number of horse riders by utilizing a permit system (NPS 1991).

B. Impacts from Horseback Riding

The adverse impacts to the hellbender from horseback riding are caused primarily by erosion and sedimentation along the river and at river crossings, and manure being deposited into the river (76 Fed. Reg. at 61,966). Increased siltation may affect hellbenders in a variety of ways, such as suffocating eggs, eliminating suitable habitat for all life stages, reducing dissolved oxygen levels, increasing contaminants (that bind to sediments), raising water temperatures, impeding movements, and reducing prey populations. (76 Fed. Reg. at 61,966-67). Undoubtedly, sedimentation is a major threat to hellbenders (Quinn et al. 2013; Lawson 2012). Moreover, hellbenders require consistent levels of dissolved oxygen, which can be reduced when organic wastes like horse manure are deposited into waterways (76 Fed. Reg. at 61,957). Because hellbenders require high levels of water quality (e.g. Briggler et al. 2007), even minor alterations to stream habitat are likely to be detrimental to hellbender populations (76 Fed. Reg. at 61,964).

C. Erosion and Sedimentation

Horseback riding can lead to erosion and sedimentation when horses' hooves dig into the soil, especially when descending steep banks at river crossings. Impacts caused by horses generally occur to a much greater degree than other trail users because the large weight of the horse is transferred to the ground at the hooves, which are relatively sharp points that easily dig into and loosen soils (Wilson and Seney 1994; DeLuca et al. 1998; Newsome et al. 2004). The hooves loosen soil particles that are mobilized and transported into waterways (Newsome et al. 2004).

The movement of soils from the trails often results in trail proliferation and widening as users seek to avoid deeply incised or wet areas of trail. Prolonged sedimentation can eventually decrease the water depth and cause changes in the water flow and temperature, which also may affect hellbenders.

Widespread erosion problems may also undermine the soil-rooting zone of nearby vegetation, causing localized loss of individual plants and an extension of the erosion problem, as the protective function of plant cover continues to be lost (Newsome et al. 2004). The destruction of this vegetative cover can result in excessive solar heating of the water. Increased temperature regimes can affect oxygen levels in the waterways and affect respiration of aquatic animals.

D. Horse Wastes

Waste produced by horses ridden in and near waterways also affects Ozark hellbenders by increasing nutrient loads and reducing available dissolved oxygen. As a 2007 NPS report on water resources in the ONSR explains, "bodily wastes from animals is a major contamination threat to the park as well as a human health risk" (Vana-Miller 2007). For example, increased levels of nitrates (that reach waterways as surface runoff or leachate from horse manure) can affect amphibians by inhibiting growth, decreasing survivability, and impairing their immune systems (76 Fed. Reg. 61,966-67). Fecal coliform bacteria are present in horse manure and are indicative of potential viruses and pathogens that cause swimmer-associated sickness in water bodies. Also, when horses walk in the river, they stir up sediment. Bacteria tied up in the sediments can be released whenever the streambed sediment is disturbed (Missouri Dept. of Natural Resources 2004; Marino and Gannon 1991). These water contaminants not only pose a threat directly to the Ozark Hellbender but also to the larger aquatic ecosystem and humans (see 76 Fed. Reg. 61,967).

There is evidence that horseback riding operations have degraded water quality in the ONSR (see, e.g., Emrie 1986; Vana-Miller 2007; Missouri Department of Natural Resources 2004). In 1998, a five-mile stretch of the Jacks Fork River from the town of Eminence to its confluence with the Current River was included on Missouri's list of impaired waters as required by Section 303(d) of the federal Clean Water Act. The identified pollutant on the Jacks Fork was fecal coliform bacteria, whose presence in large numbers indicated contamination by fecal wastes of warm-blooded animals (Davis and Richards 2001). The length of the impaired reach was increased to seven miles in 2002 because of data indicating the fecal coliform bacteria problem existed over a broader area (Davis and Barr 2006). From 2003 to 2008 the Missouri Department of Natural Resources again expanded the impaired stretch of the Jacks Fork, to eight miles (76 Fed. Reg. at 61,966). In 2002 at river mile 4.5 the annual coliform geometric mean was 26, and in 2009 it was 116 (Friends of the Ozark Riverways 2010).

The USGS conducted a three-phase study to better understand the extent and sources of microbiological contamination in the impaired reach. Davis and Richards (2001) found fecal coliform

densities were generally larger in that reach and that the standard was exceeded at some sites. Data from Phase II (Davis and Richards 2002) indicated that, after accounting for wet-weather flow, the largest densities were during horse trail rides - this occurred in both water and streambed sediment samples. That study did not positively identify sources of contaminants but runoff from a commercial horse trail ride outfitter and horse stream crossings were identified as likely sources (76 Fed. Reg. at 61,966, citing Davis and Richards 2002, pp. 1, 3, and 36).

Phase III (Davis and Barr 2006) was an attempt to determine the causes and sources. The scientists found that increases in fecal coliform bacteria densities in the Jacks Fork are associated with cross-country horseback trail-riding events (Davis and Barr 2006). A total of 501 fecal coliform bacteria isolates were analyzed via a methodology that identifies presumptive sources of fecal bacteria in the Jacks Fork River - 70 isolates were from sewage, 132 to horses, 118 to cattle, and 181 unknown. In short, recreational users (including boaters and swimmers) are not the primary source of fecal coliform bacteria in the Jacks Fork; rather, the presence of fecal coliform bacteria is associated with other animals, of which horses are the primary sources (Davis and Barr 2006).

VI. Legal Requirements for Consultation under the Endangered Species Act

When a species has been listed or critical habitat designated under the ESA, all federal agencies - including the NPS - must ensure through consultation with the FWS that their programs and activities are in compliance with the ESA. 16 U.S.C. Â§ 1536(a)(2). Through consultation under Section 7 of the ESA, federal agencies work with FWS to determine whether their actions will jeopardize listed species' survival or adversely modify designated critical habitat, and if so, to identify ways to modify the action to avoid that result. 50 C.F.R. Â§ 402.14. An agency is required to review its actions "at the earliest possible time" to determine whether the action may affect listed species or critical habitat. 50 C.F.R. Â§ 402.14(a). As such, at this stage the NPS should already be considering how its possible actions in the new RTMP may affect the Ozark hellbender and any other relevant listed species.

Section 7 applies to all actions in which there is discretionary Federal involvement or control. 50 C.F.R. Â§ 402.03. The scope of agency actions subject to consultation are broadly defined to encompass "all activities or programs of any kind authorized, funded, or carried out, in whole or in part, by Federal agencies." 50 C.F.R. Â§ 402.02 (definition of "action"). Planning documents, such as the NPS's roads and trails management plans, are ongoing agency actions subject to Section 7 of the ESA. See *Pacific Rivers Council v. Thomas*, 30 F.3d 1050, 1053-54 (9th Cir. 1994).

For each federal action, the NPS must ask the FWS whether any listed or proposed species may be present in the area of the agency action. 16 U.S.C. Â§ 1536(c)(1); 50 C.F.R. Â§ 402.12. If listed or proposed species may be present, the NPS must prepare a "biological assessment" to determine whether the listed species may be affected by the proposed action. *Id.* The biological assessment must generally be completed within 180 days. 16 U.S.C. Â§ 1536(c)(1); 50 C.F.R. Â§ 402.12(i).

If an agency determines that its action "may affect" but is "not likely to adversely affect" a listed species or its critical habitat, the regulations permit "informal consultation," during which FWS must concur in writing with the agency's determination. 50 C.F.R. Â§ 402.14(a)-(b). If the agency determines that its action is "likely to adversely affect" a listed species or critical habitat, or if FWS does not concur with the agency's "not likely to adversely affect" determination, the agency must engage in "formal consultation," as outlined in 50 C.F.R. Â§ 402.14 ("General Formal Consultation"). 50 C.F.R. Â§ 402.02, 402.14(a). An agency is relieved of the obligation to consult on its actions

only where the action will have "no effect" on listed species or designated critical habitat. Effects determinations are based on the direct, indirect, and cumulative effects of the action when added to the environmental baseline and other interrelated and interdependent actions. 50 C.F.R. Â§ 402.02 (definition of "effects of the action").

To complete formal consultation, the FWS must provide the NPS with a "biological opinion" explaining how the proposed action will affect the listed species or habitat. 16 U.S.C. Â§ 1536(b); 50 C.F.R. Â§ 402.14. Consultation must generally be completed within 90 days from the date on which consultation is initiated. 16 U.S.C. Â§ 1536(b)(1)(A); 50 C.F.R. Â§ 402.14(e).

If the FWS concludes that the proposed action "will jeopardize the continued existence" of a listed species, the biological opinion must outline "reasonable and prudent alternatives." 16 U.S.C. Â§ 1536(b)(3)(A). If the biological opinion concludes that the action is not likely to jeopardize the continued existence of a listed species, and will not result in the destruction or adverse modification of critical habitat, the FWS must provide an "incidental take statement," specifying the amount or extent of such incidental taking on the listed species, any "reasonable and prudent measures" that the FWS considers necessary or appropriate to minimize such impact, and setting forth the "terms and conditions" that must be complied with by the NPS to implement those measures. 16 U.S.C. Â§ 1536(b)(4); 50 C.F.R. Â§ 402.14(i). Taking of listed species without the coverage of an incidental take statement is a violation of Section 9 of the ESA. 16 U.S.C. Â§ 1538.

VII. Recommendations

To reduce erosion and sedimentation, the NPS should emphasize restoring and stabilizing the riparian corridor. There should be no new conversions of bottomland riparian forests to open fields, and impaired and eroded riverbanks should be restored with native vegetation. In addition, any new developed facilities along rivers should be considered only after analyzing impacts on water quality and Ozark hellbenders

The NPS must use great caution when planning any additional stream crossings to ensure no adverse impacts to the hellbender. We strongly believe that an expansion of the horse trail system cannot occur unless the impacts are fully analyzed. In addition, the NPS must consult with the U.S. Fish and Wildlife Service under the Endangered Species Act on how such it's RTMP would impact the Ozark hellbender.

As required under Section 7 of the Endangered Species Act, the NPS must consider impacts to both the survival and recovery of the Ozark hellbender in its analysis of its current roads and trails system, as well as its analysis of options for the new RTMP. Impacts of horse use on Jacks Fork cannot be dismissed by arguing that Ozark hellbenders may be extirpated from this river. Reestablishment of Ozark hellbenders to Jacks Fork is important for the recovery of the subspecies, and nevertheless, Jacks Fork flows into the Current River, which is currently occupied by the salamanders.

We support the NPS's intention to consider possible closures and rehabilitation of highly impacted areas such as some unauthorized roads and trails. The NPS should work with the U.S. Fish and Wildlife Service to prioritize those areas where closures and rehabilitation will provide the most benefit for the Ozark Hellbender.

We are very concerned that the NPS lacks the funding and personnel to implement expanded recreational use and new developments. The ONSR has seen a reduction in staff in the last decade due

to funding decreases, and NPS should hesitate to make changes to park management that would require increases in staff to monitor resources and provide enforcement to respond to increases in use.

The NPS must work with the U.S. Fish and Wildlife Service to prepare an Endangered Species Act Section 7 biological opinion on the effects of its proposed RTMP on endangered wildlife within the OSNR, including the Ozark hellbender, Indiana bat, and gray bat. We also recommend that the NPS adopt any mitigation measures recommended during consultation.

If you have any questions or would like to discuss these comments, please contact me.

Sincerely,

Jennifer Loda
Amphibian and Reptile Staff Attorney
Center for Biological Diversity
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Correspondence: 287

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Status: Reviewed Park Correspondence Log:
Date Sent: Date Received: 11/20/2015
Number of Signatures: 1 Form Letter: Master
Contains Request(s): No Type: Letter
Notes:

Correspondence Text

To the Roads and Trails Planning Team:

I am writing to ask that you prioritize the preservation and recovery of the endangered Ozark hellbender in your Roads and Trails Management Planning. Ozark hellbenders are habitat specialists in the Ozark's rivers, highly dependent on good water quality, and are thus critically affected by roads and trails that cross over or are adjacent to rivers and streams in the Ozark National Scenic Riverways.

The National Park Service must consider the effects of its roads and trails on the Ozark hellbender and follow the Endangered Species Act's requirement to ensure not only that habitat is not further damaged, but also that the park's plans support the species' recovery. Roads and trails contribute to poor water quality in riverways by causing sedimentation through soil erosion, as well as contributing to horse-waste runoff into streams.

Increased sediment in rivers is a major threat to hellbenders, as it can suffocate their eggs, eliminate habitat, destroy water quality and reduce prey. The impacts of horseback riding are of particular concern, as riding is extensive in and near the Riverways and damages hellbender habitat.

Any new roads and trails considered on the Riverways must be analyzed for impacts to the Ozark hellbender and designed to avoid any potential erosion and any increase in sedimentation or horse waste. Currently existing roads and trails must also be analyzed, with trail closure and rehabilitation for sites affecting Ozark hellbenders and limitations imposed on the size and number of large commercial horseback rides allowed in the park.

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Correspondences - Ozark Roads and Trails Management Plan - PEPC ID: 56591

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 16

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Correspondence Text

Topic Question 1:

Multi - use trails are great for many different people. Equestrians, hikers, and mountain bikers. With several years of mountain biking throughout the Midwest some of the best trails are in the Mark Twain National Forest and they are restricted to mountain bikers for some reason.

Topic Question 2:

Multi-use trails are great and provide opportunity for everyone to enjoy the beauty of Missouri. I ride weekly at a multi-use park in St. Charles County and have never encountered a problem. It is helpful to post "trail etiquette" signs so that users know how to be courteous to other users. We all just want to enjoy the land.

Topic Question 3:

Access to camping as many of the user groups like to make long weekend outings involving several activities like camping, floating, mountain biking, hiking, and equestrian.

Comments: Please consider allowing mountain bike usage in these areas. Mountain bikers are a courteous group who just enjoy the outdoors. Often they are first to lend a hand in trail work days in helping to maintain trails. They also are very often involved in organizations and events that can help raise funds for trail maintenance.

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 7

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Correspondence Text

We would like to work with the ONSR on any road/trail closings that impact access to our facilities within ONSR property.

Often the lines that run on ONSR property continue on to serve other members in the area as well as ONSR facilities.

If the road/trail is to be closed and gated then we would request being able to put one of our locks in the chain. This will ensure that we can restore power to ONSR and other members in the most efficient way possible as often it is in the middle of the night and during the worst weather conditions.

Thanks

Troy Hogsett
Manager of Engineering
Howell Oregon Electric Cooperative

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 52

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Correspondence Text

Topic Question 1:

Please realize I live in Springdale, Arkansas, and work in the 'field' for International Mountain Bicycling Association, as Regional Director. IMBA is based out of Boulder Colorado, FYI...

Mountain Biking, as well, multi-use recreational opportunities on existing and future trails. ONSR is a vital link to connect many other trails in Missouri for mt biking and hiking. Opening these trails up for mt biking will no doubt increase Tourism and revenue for the local community and bring more visitors to this wonderful park.

Topic Question 2:

Equestrians would be better served if trails could be designated for their use only. Provide trails for other users that fit hiking/biking, and secure area's for each group based on trail recon/assessment for each group. Most common multi-use trail includes hikers/runners/mt bikers all together, equestrians separated. Educational awareness, collaborating ALL user groups with meetings and in-services on trail etiquette, etc, is a vital component to help with user conflict and understanding each trail and the users.

Topic Question 3:

Consider consulting with IMBA, or experienced mountain bikers to help assess existing trails and share said knowledge with NPS staff before deciding fate of each existing trail, and which user will be on these trails. As well, consult with IMBA or another professional trail building organization to help with conceptual design and master planning, especially with 'new' mt bike trails.

Topic Question 4:

NPS has qualified staff regionally and nationally to support this effort. Maybe some input from locals who 'use' these roads would help.

Topic Question 5:

Please consider utilizing IMBA's service as far as trail recon, mapping, and consultation for existing trails and any new trail development. IMBA is a non-profit advocacy group with field staff willing to help with this project.

Comments: ~~1/4~~PUBLIC COMMENT IN REGARD TO OZARK NATIONAL SCENIC RIVERWAY'S NEW MAINTENANCE PLAN.

My name is Steve Schneider and I am the Regional Director for International Mountain Bicycling Association's South Central Region.

For those of you that don't know, IMBA [as we are called] is the worldwide leader in mountain bike advocacy, and our mission is simply to create, enhance, and preserve great mountain biking experiences.

I would like to share with all of you why IMBA sees an important value in this new plan at the Ozark National Scenic Riverway. Regionally, and nationally, new trails and bike parks are popping up all over, why?, because more and more folks are recreating, and that is what the public wants. South Central Region alone has a new \$1million bike park opening in Rogers Ar next week, OKC is investing in a similar project next to a \$40 million kayak center downtown, SE Kansas is developing trails, Louisiana is now building trails in State Parks, Texas and Oklahoma have new trail projects as well, all due to communities understanding the relevance recreation has to combat health and wellness issues and allow folks a natural experience outside. Arkansas is now a top 10-mountain bike destination, due to a collaborative effort, including the volunteers, lands managers, local communities, and private investors all harmoniously working together. Missouri has all these factors in place as well. Many trail projects are flourishing in St Louis, Warsaw, Kansas City Metro area, Branson, Lake of the Ozarks, Poplar Bluff, Columbia, and the recently expanded 2Rivers Bike Park just south of Springfield. Trail specific Volunteers and non-profits thrive in Missouri, like Urban Trails LLC, Trail- springs, Mid-West Off-Road Cyclists, Ozark Trails Association, and Gate- way Off-Road Cyclists. These organizations have developed incredible partnerships in each community the reside in, and would be more than IMBA.com ~~â€~~ PO Box 7578 ~~â€~~ Boulder ~~â€~~ CO ~~â€~~ 303.545.9011 ~~â€~~ 303.545.9026

~~1/4~~~~1/4~~

~~1/4~~willing to help rally locals around this National Scenic Riverway's trail system. A reminder, back in 2013 Missouri was named 'best trails state' in America, showing the diversity this state has for hikers, runners, equestrians, and mountain bikers alike. And we believe opening up trails for mountain bikers through this park will improve the potential to link other existing trails in Missouri, helping create a magnificent world-class bike and pedestrian plan. Doing so will generate more visitors and revenue into this area of the state, undoubtedly. ONSR has an awesome network of trails and roads ready for cyclists, this access has not been encouraged up until now. Due to trails and infrastructure already in place, cost would be minimal for NPS to navigate off-road cycling on ONSR lands. As well with proper signage, public education, and instructed trail awareness, liability becomes insignificant as well. To date, The National Parks Service already allows mountain biking in New River Gorge WV, Big South Fork, Tn, and Mammoth Caves Ky with great success. IMBA has and continues to support the NPS, instilling local chapter association volunteers as trail stewards, providing aid for the parks service with trail restoration, and on-site GIS through our MTBProject interacting mapping team. If needed, IMBA is willing to join forces and provide service to ONSR and the NPS, which could include volunteer trail stewardship development, trail recon/assessment, GIS/mapping, or other specific

tasks geared towards this new general management plans success.
Thank you for allowing me this opportunity to comment, and to share IMBA's position of advocacy and encouragement for mountain biking on National Parks Service lands.
Steve Schneider steve.schneider@imba.com
IMBA.com • PO Box 7578 • Boulder • CO • 303.545.9011 • 303.545.9026
1/4
">

**PEPC Project ID: 56591, DocumentID: 68296
Correspondence: 164**

Author Information

Keep Private: No
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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 11/09/2015 Date Received: 11/09/2015
Number of Signatures: 1 Form Letter: Master
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
See Letter

Topic Question 2:
See Letter

Topic Question 3:
see letter

Topic Question 4:
see Letter

Topic Question 5:
see letter

Comments: Indian Trails Chapter Show-Me Missouri Back Country Horsemen
7127 Highway FF
Lonedell, Missouri 63060

United States Department of the Interior
National Park Service
Ozark National Scenic Riverways

PO Box 490
Van Buren, Missouri 63965

Roads and Trails Planning Team,

Indian Trails Chapter is please to give comment on the Ozark National Scenic Riverways Roads and Trails Management Plan. The plan is to improve the systems of roads and trails to ensure that it provides access to a variety of locations and experiences while protecting the Riverways' resources. As there are many trails already established along the river and ridges, showcasing the Ozark's scenic beautiful, with outstanding views and natural wonders, this would be the most logical place to start designating multi-use trails. Park trails should be multi-use, single track for equestrian, hiking and biking. The best tool to use to address potential conflicts between different user groups is education. Such education can be provided by different user groups such as Show-Me Missouri Back Country Horsemen and the Ozark Trail Association. All of the Ozark Trail should be designated as multi-use. When calculating the trail mileage Public and Utility right-of-way roads and Park Service roads should not be counted as multi-use trails.

A good location for placement of handicap accessible trails would be exciting parking lots, campgrounds and picnic areas. We would suggest Cedar Gove, Ackers and Welch's Spring trail and Susie Nichols Cabin and Trail.

Some opportunities we would like to see included in the trail system would be developing overnight campgrounds for equestrian users as there are overnight facilities for hikers and bikers presently. We suggest the creation of public access of staging and parking areas for multi-use trail users. At major destination locations we would like to see rest areas with picnic tables, hitching rails, mounting blocks and portable toilets.

When developing the new designated trails systems there are some outstanding destinations outside the park that should include access in the new system:

Big Creek Trail Rides and Campground
Whispering Pines Campground
Pine Crest Cabins and Campground

Destinations within the park's trail system should include:

Akers store and Picnic Area
Mt. Zion Church
Howell-Maggard Cabin
Welch's Spring Hospital and Trail
Spring Creek Water Fall (river mile marker 11)
Bluff School
Flying W Beach and Camping Area (river mile marker 10.3)
Cedar Grove Low Water Bridge and Campground
Lower Parker School
Susie Nichols Cabin and Trail
Parker Ford River Crossing
Shafer Lakes

Correspondences - Ozark Roads and Trails Management Plan - PEPC ID: 56591

Scenic Bluff Area (river mile marker 4.5)
Baptist Camp

We appreciate the opportunity to provide comment on the development of the roads and trails plan that is critical for protecting the special natural and cultural features of the park while providing quality recreational opportunities for all park visitors.

Respectfully,

Allison Schottenhaml, President
Indian Trails Chapter SMMBCH

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 283

Author Information

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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: Date Received: 11/24/2015
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Letter
Notes:

Correspondence Text

Thank you for the opportunity to comment on the upcoming ONSR Roads and Trails Study. L-A-D Foundation lands join Riverways properties in many locations. We work to protect the natural resources of the Current River Watershed, and to help to provide appropriate recreation opportunities.

Inappropriate and ill-advised roads and trails development since the park was established have significantly degraded the resource designated by Congress in 1964 as a nationally significant river. Motorized intrusion, legal and illegal, has damaged the quality of visitor experiences as well as the resource itself. The most important outcome of this planning process would be to contain and reverse these damages.

L-A-D staff attended the open house meeting October 29 in St. Louis, and later reviewed the general information NPS provided. We have already commented on the General Management Plan. We offer additional recommendations below, and will provide more detailed comments as this planning process continues.

â€ Eliminating illegal and unnecessary roads in the park should be the highest priority.

â€ Closures must be backed by the necessary force of law. Recommendations must include adequate funding.

â€ The roads and trails plan should include as a goal provision for at least one full day float, free of motorized intrusion.

â€ The park could accommodate some expansion of its official equestrian trail system along with closing and restoring unnecessary and damaged trails, and eliminating unnecessary river crossings.

Equestrian trails might be best on roads closed to motorized vehicles, as a way of exchanging uses and eliminating additional development.

â€ We encourage trails for each particular use, thereby minimizing potential conflict. Multi-use segments of trails might work over short distances to connect certain trails.

â€ Ozark National Scenic Riverways should offer much more opportunity for hiking, consistent with park visitor needs and expectations. The long-proposed Current River Trail should be approved by NPS staff as soon as possible. Volunteers are anxious to be involved and ready to assist with its development.

We are confident that better management for this park's natural resources will deliver great benefit and positive economic impact for this important region of our state. Best of luck in your planning efforts.

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 5

Author Information

Keep Private: No
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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 10/15/2015 Date Received: 10/15/2015
Number of Signatures: 1 Form Letter: Master
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The Missouri Bicycle and Pedestrian Federation represents the interests of people who walk, bicycle, and use trails in Missouri, including over two million bicyclists and six million pedestrians. We work to encourage trail and bicycle/pedestrian access and for the creation of regional, statewide, and national pedestrian, bicycle, and trails system of world-class quality.

The ONSR Roads and Trails Plan is a major opportunity to add mountain biking, hiking, and equestrian access in a part of the state that has not traditionally had such access, and provide more well-rounded natural and recreational opportunities to visitors to the ONSR area. These new recreational and scenic opportunities have the potential to combine with current recreational and scenic opportunities to create a truly work class national park experience and to give a significant boost to tourism in the region.

The plan creates the opportunity to do all this in an environmentally sensitive manner, in a way that heightens and creates appropriate access to the the scenic and natural beauty of the area.

* We encourage the development of a major, world-class hiking and mountain biking trail network in ONSR and interconnected with surrounding natural areas

* We also support development of equestrian trails in the area Touring by mountain bike

* For practical reasons, mountain biking and equestrian uses of trails are often incompatible. In working to reduce conflict between different trail user groups, we encourage ONSR to:

- Follow national best practices in developing trail networks for use by mountain bikers, equestrians, and hikers; particularly in design of trail networks to avoid conflicts between different users.

- Develop of separate trail networks for equestrian and mountain biking use wherever needed- - particularly on trails that receive or may receive significant use.

* Missouri has a strong existing mountain biking community and ONSR has a significant opportunity to work with that community to develop the recreational, scenic, environmental, and tourism potential of ONSR in cooperation with that community. In developing the mountain biking trail system and working out multi-use issues, work closely with national and local mountain biking groups with extensive experience in developing and maintaining mountain bike trail systems and in working to deal with conflicts among user groups.

* Study several successful mountain biking trail systems across Missouri in similar natural areas to create a blueprint for success in ONSR, including:

Truman Lake Mountain Bike Park in Warsaw

Two Rivers Mountain Bike Park in Highlandville

Landahl Park in Blue Springs

Blue River Parkway Trails

Swope Park Trails

Berryman Trail in the Mark Trail National Forest

Council Bluff Recreation Area

Many state parks and state recreation areas, including Crowder State Park, Castlewood State Park, Rock Bridge Memorial State Park, and Poosey Conservation Area

* Create mountain biking trails and segments of varying difficulty, catering to a variety of users and ability levels, a variety of lengths, and a variety of use types- -occasional use, day use, multi-day visitors, extended tours, mountain bike touring/camping, etc.

* Mountain biking opportunities on singletrack trail and on unpaved roads should be thoroughly explored. In addition to singletrack opportunities a "gravel network" of mountain bikable roads and trails in the area- -perhaps including roads inside and outside the boundaries of ONSR- -would be of major interest. Gravel riding

* Opportunities to create connected networks of trails with neighboring natural areas and adjoining trail systems should be fully explored.

* Opportunities to create and connect major regional and statewide trail systems should be thoroughly explored for hiking, mountain biking, and equestrian trails.

* On-road bicycling is an important feature of many national parks and offers an untapped opportunity in the area of ONSR. The nationally recognized TransAmerica Trail/U.S. National Bicycle Route 76 passes through ONSR and gives access to many of the scenic highlights of the region. ONSR should adopt a position working to maximize on-road bicycling opportunities in the region, work with agencies who own roads where on-road cycling can occur to improve conditions for bicycling and create new opportunities, and identify and promote existing and potential new on-road bicycling routes and tours within the ONRS region.

* We support a through mountain biking route on and along the Ozark Trail. The Ozark Trail section within ONSR is one of the major remaining mountain biking gaps in the Ozark Trail. The plan should

create a route through the ONSR and adjoining lands to plug this gap in the Ozark Trail mountain biking system. Creating a mountain biking connection through the ONSR area to connect the Ozark Trail for mountain biking use is a project of regional, statewide, and national significance.

* We believe that developing a major regional tourism industry can be developed in this region, featuring multi-day mountain biking touring expeditions- -similar to mountain bike adventure touring available in other states with major interconnected mountaing bike trail systems. The Ozark Trail mountain biking network could and should be features on lists of top mountain bike touring opportunities like this one.

* Mountain biking tourism, if implemented in a way similar to other states, would be an ideal complement to float trips and other tourism opportunities currently available in ONSR. Mountain biking expeditions would help visitors stay longer, draw visitors from longer distances, drawing far more out of state and international visitors, and provide a positive impact to the local economy. Mountain bike tourism visitors are high quality visitors who respect the land, the environment, and the communities they visit. This a type of tourism that the ONSR communities want to foster and encourage, because it is good for the communities and good for the future of ONSR.

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 6

Author Information

Keep Private: No
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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 10/16/2015 Date Received: 10/16/2015
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

In the previous comment, we suggested reaching out to major groups with experience developing and promoting mountain bike trails systems as you consider similar developments in ONSR.

In particular, we would recommend reaching out to these groups:

- International Mountain Biking Association (IMBA), <https://www.imba.com/>, Steve Schneider <steve.schneider@imba.com>
- Gateway Off-Road Cyclists (GORC), <http://gorctrails.com/>, donjoian@sbcglobal.net,
- Earthriders, <http://www.earthriders.com/> pete@earthriders.com,
- Urban Trails Co., <http://www.urbantrailco.com/> benreed007@gmail.com
- Truman Lake Mountain Bike park developers/promoters,
<http://www.welcometowarsaw.com/259/Truman-Lake-Mountain-Bike-Park> and
<http://www.trumanlakebikes.com/> mac@trumanlakebikes.com
- Green Hills Trails Association, <http://greenhillsvelo.tripod.com> dlong@windjammercable.net

These are the groups that have the experience and expertise with what works and what is needed in Missouri to develop a world-class mountain biking trails and touring system.

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 262

Author Information

Keep Private: No
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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 11/25/2015 Date Received: 11/25/2015
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:

Hiking trails, both long-distance (through multiple ownerships), and shorter trails to special features.

Topic Question 2:

Multi-use trails are not advisable, especially in so heavily used a park with so limited a corridor along the rivers. Equestrian and hiking trails should be separate. Less-traveled county roads may be used for ATVs and mountain biking.

Topic Question 3:

Eliminate confusing and damaging mazes of unauthorized, user-designated trails and restore to natural conditions. Properly designed equestrian trails (with very limited river crossings) are needed in certain areas where there are currently no designated trails, but such new trails should be limited to about 35 miles total. More hiking trails, including cooperative long-distance trails across multiple ownerships, are urgently needed.

Topic Question 4:

Reduce/eliminate unauthorized roads and properly maintain, mark, and map authorized roads. Give major priority to restoring areas degraded by unauthorized roads. Minimize vehicular access points to the river, providing vehicle parking areas out of site from the river.

Topic Question 5:

Correspondences - Ozark Roads and Trails Management Plan - PEPC ID: 56591

Consider stakeholder workshops, carefully balanced as to interests and geography (local, regional, state and beyond).

Comments: The Missouri Parks Association, a statewide citizens organization of more than 3,000 members dedicated to the protection, enhancement and interpretation of Missouri parks and historic sites, is pleased to comment on the forthcoming ONSR Roads and Trails Management Plan process. We have long been supportive of stronger management of ONSR because of its roots in the Missouri state park system and its key role in the history, ecology, and economy of the Ozarks.

We believe the forthcoming roads and trails study is critically important as the National Park Service seeks to address the proliferation of unauthorized roads, river access points for motor vehicles, and the maze of undesignated horse trails and equestrian river crossings at ONSR in recent years. We ask that this planning process be geared toward determining which of the many roads, trails, and river access points and crossings are in fact designated and appropriate, redesigning any portions of designated roads and trails that are degrading natural or cultural resources or the visitor experience, and closing and restoring any that are poorly located or undesignated.

We especially would like to see a return to the original concept of at least certain stretches of both the Current and Jacks Fork Rivers free of any visible motorized intrusion on river banks or gravel bars for the distance of a day's float. This means that primitive camps would be clearly designated and adequately screened from the river and non-designated camps closed and restored, and that no motor vehicles or camper trailers would be visible from the river.

There is undoubtedly a need for designated equestrian trails in the upper Current River, where there is considerable equestrian use with no designated trails, but designated trails should be limited to approximately 35 miles, well designed, clearly marked, and with only a very few authorized river crossings. The remaining trails must be closed and restored to a natural condition, with adequate enforcement to assure success.

There is also a need for additional hiking trails in many areas of the Riverways where there are none currently. We especially urge ONSR officials to move forward expeditiously to approve and begin work on the proposed multi-agency, long-distance Current River Trail, much of which (except on ONSR lands) has already been completed. We do not believe it is necessary to provide for ATV or mountain-bike use on hiking or equestrian trails or to provide new trails for these purposes within the narrow corridor of the Riverways, since there are and will inevitably remain many miles of county roads in the area suitable for these uses.

Finally, we encourage the use of carefully balanced stakeholder workshops in the planning process. Members of our organization stand ready to participate in such efforts.

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 221

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Correspondence Information

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Date Sent: 11/23/2015	Date Received: 11/23/2015
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Topic Question 1:
More trails

Topic Question 2:
Okay

Topic Question 3:
no comment

Topic Question 4:
no comment

Comments: We don't expect manicured trails, just trails that are marked and free of big timber. Thanks
">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 207

Author Information

Keep Private: No
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Correspondence Information

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Date Sent: 11/22/2015 Date Received: 11/22/2015
Number of Signatures: 1 Form Letter: Yes ([Master](#))
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:

Officially designated and marked trails for hiking, bicycling, and equestrian trails giving the public the opportunity to view and enjoy the natural beauty and historically important sites within ONSR. A modest amount of primitive and/or full hookup campsites designed for horse trailers with tie-line posts would be appreciated.

Topic Question 2:

Equestrians recognize and accept that they must share the trails with hikers and bikers, alike. They anticipate the meeting of other trail users and use the utmost care and respect for others. They look forward to the interaction with other users, since many hikers and bikers have never encountered horses/mules on the trail. Equestrians know that this is the best time to interact with other trail users, and help them understand the psychology of animals, when encountering something strange on the trail, i.e. hikers with large back packs, and bicycles.

There needs to be signage at all trail heads, thus explaining the proper etiquette on the trail....hikers and bikers should yield to equestrians, and go to the down hill side, if it is safely possible.

Signage warning of potentially hazardous upcoming conditions (such as narrow trails) should advise bikers to dismount and all users to be alert and proceed with caution.

Rest areas frequented by ALL trail users should include toilets and picnic tables for all, and hitch rails and mounting blocks for equestrians. Trail riders can and should clean up manure at campgrounds and equestrian trail heads where manure bunkers or receptacles can be located and tended. Riders cannot, however, be expected to clean up after their animals along the trail or at rest areas where tools or receptacles are available.

Recognize that many equestrians like to stay close to their mounts while resting and eating lunch,

therefore it is suggested that a couple of picnic tables be close to the hitch rails. Facilities do not need to be separate, just properly designated to provide appropriate separation.

Topic Question 3:

The Park Service should take in to consideration that many people enjoy the out of doors by horseback, because they are unable to do so by hiking or bicycling, due to mental or physical challenges.

Therefore, the park service should be willing to provide a quality outdoor experience for as many user groups as possible.

The park staff/service should be willing to concession representatives and Show-Me Missouri Back Country Horsemen to reroute any trails that pose an environmental hazard, such as to minimize erosion and damage to sensitive areas.

Topic Question 4:

I think that utilities, emergency responders and Park personell need access to any given area, at any given time. But I feel that ORV's and private vehicles need to be restricted.

Designated trail heads with adequate parking is vital, for all trail users, but access from these areas to the trail should be prohibited.

Topic Question 5:

Use as much as the road and trail system as possible, to provide for a safe, and environmentally friendly visit, for all trail users.

Comments: Show-Me Missouri Back Country Horsemen (SMMBCH) wishes to thank Superintendent Johnson and his staff for their committment to protecting park resources, providing ourdoor experience opportunities to all segments of the public, and, especially, their cooperative attitude towar equestrian users.

Therefore, SMMBCH wishes to be a valued and valuable partner with NPS in their efforts to improve the trail system on ONSR, and to maintain those trails and associated infrastructure in the near future, and for future generations to come.

SMMBCH would like to help organize and participate in educating trail users through the Leave No Trace Prinicples.

Thank you.

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 230

Author Information

Keep Private: No
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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 11/23/2015 Date Received: 11/23/2015
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
More trails open for multiple use

Topic Question 2:
I feel like with proper instructions on how to share the trails with other types of users we can all share the the trails.

Topic Question 3:
Listen to the local users and businesses that use the ttrails.

Topic Question 4:
Make sure to have trails and roads that will allow emergency access all along the river.

Topic Question 5:
How it will effect the economy in all the county's if you start limiting the horse traffic on the trails. The equestrian riders bring a lot of money to the local economy when they come from all over the US to see the beautiful Ozarks, and by increasing the trail systems along the upper current river it will help reduce some of the over crowding and wear on the trails around eminence.

Comments: We have invested our life savings into a local business that relies on the trails being open to the equestrian people. If the trails are closed to us it will ruin our business and hurt the entire community.

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 65

Author Information

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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 10/28/2015 Date Received: 10/28/2015
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:

Mountain biking on trails and roads of significant length. They may need to be separated from horses depending on volume of users and types of trails.

Topic Question 2:

Multi-use is ok if there is a low volume of users and depending on the character of the trail. Hikers and mountain bikers are inherently more compatible than either with horses. Mountain bikes should be allowed as a default on all trails unless there is a reason to restrict.

Topic Question 3:

Manage horse trails to minimize environmental damage. Mountain bike trails should be considered along the rivers and tributaries to minimize grade for families. Other trails can be more technical like a hiking trail. Some trails should connect to the Transamerica Trail that goes along Highway 106

Topic Question 4:

Many cyclists ride gravel roads so there may be opportunities to connect special features of the park by gravel road that would be used by cyclists. A relatively new phenomenon is gravel road races/rides. The October 17, 2015 Cuban Gravel Crisis (Cuba MO) attracted 150 riders from MO and 5 other states in its first year. About 50 riders did each distance of 20, 50 and 100 miles. Such events could be held in the off-season and be a big tourism draw.

Topic Question 5:

Allow mountain biking as a default unless there is a reason it needs to be restricted. Capitalize on the

many cyclists who are already riding by on the TransAmerica Trail on Highway 106 and make the ONSR accessible to them as much as possible. The most family-friendly hiking/mountain biking trails would be ones that go along rivers and tributaries. The most successful trails are long and connect special features that people want to access.

Comments:

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 55

Author Information

Keep Private: No
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Correspondence Information

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Date Sent: 10/27/2015 Date Received: 10/27/2015
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:

Hiking, backpacking, mountain biking, bicycle touring. Allow me to reference the following article:
<http://www.arkansasoutside.com/the-governor-and-cycling/>

In particular, the governor was quoted as saying "Tourism is the number two industry in Arkansas, and mountain biking is one of the fastest growing sectors in tourism. We're not going to be engaged in all the right arenas if we're not supporting mountain biking." I think that this applies to Missouri as well. Cities and towns near ONSR absolutely could benefit from increased tourism. I'd love to see new trails developed with mountain biking in mind. Most of the older trails weren't built with bicycles in mind and therefore aren't very attractive even if they were opened up to bikes.

Topic Question 2:

This is nothing new. Most trails we ride as mountain bikers are at least open to hikers if not equestrians. If you really want to innovate and provide a top notch experience, then separate trails are the way to go. Horses have PLENTY of trails available in ONSR already whereas mountain bikers have almost zero. As little as 25 miles of connected, well built mountain bike trail could become a huge draw to the area, while leaving all the existing horse trails for the exclusive use of the equestrian community.

Topic Question 3:

Obviously you need to fill up the lodging at the new Camp Zoe, whatever its name may be. Of course it'll be full in the summer with people seeking cold waters on hot days. In the shoulder seasons and even winter, mountain bike trails and backroads cycling routes could create additional visits. I personally hope to host a cycling event at the future state park that would draw 100-200 participants for

a whole weekend.

Topic Question 4:

I am looking for a way to create a long-distance gravel cycling loop to the east of the future state park where Camp Zoe was located. The route needs to avoid using any busy highways. Some better maps of the Roger Pryor backcountry area would be helpful. I've had trouble figuring whether certain roads are actually there or if they are just overgrown fire roads.

Topic Question 5:

None that I can think of.

Comments:

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 186

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Correspondence Information

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Correspondence Text

Topic Question 1:

If it can be done safe and environmental manner create additional trails. This would include multi-purpose trails. This would spread out trail usage and reduce the potential trail user conflict. By opening up additional trails to mountain bikers and equestrians creates additional destination trails. Which could increase visitor attendance. If it can be done in an environmentally sound way.

Topic Question 2:

Multi-purpose trails if they are environmentally sound is the way to go. But there will always be potential conflict between the different trail users. Trail user education and respect is a must.

Topic Question 3:

Trail Factors:

- * Id. environmentally unsound trails-re-route-abandon-repair.
- * Id. New cultural, scenic, recreation, resources to connect to the new trail system.
- *Unauthorized trails why are they in existance? Environmentally sound? Legitimate use and purpose? Maintainable? Maintenance? Do they need to be authorized trails.

Topic Question 4:

1. Is the road environmentally sound. Is it degraded.
2. Of what purpose does the road serve. Are there other alternatives to the road and access.
3. Are there safety issues involved with the road and destination.

Topic Question 5:

The Ozark Trail forms the backbone of trail development through the Scenic Riverways. I would look at natural or cultural features that are not connected by trails to look at ways they can be connected with trails and accessible to park visitors. If it can be done in an environmentally sound way.

Comments: Question: how has the recreational uses of the Scenic Rivers changed in the last 30 years. What are the demands and trends and can they be supplied in a safe and environmental manner. What are the visitor experiences they are looking for when going to the Scenic Riverways.

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 258

Author Information

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Correspondence Information

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Correspondence Text

Topic Question 1:

The ONSR should provide more opportunities for hiking. In particular develop a foot path only long distance trail from Current River State Park to Owls Bend.

The Park should consider providing additional loop trails of varying lengths for users seeking more moderate hiking experiences.

Topic Question 2:

As recognized in the GMP, multiple use trails can result in reduced user satisfaction. Also trail construction parameters, monitoring and repair needs vary among trail types, for example between equestrian trails and hiking trails. We recommend single use trails.

The updated ONSR GMP calls on the NPS to partner with other non-profits to benefit the Park. The Sierra Club has been providing volunteers to help with trail maintenance near the Current River, and would be excited to join with the NPS to continue that partnership.

NPS partnerships with specific user groups could provide greater understanding and compliance with road and trail requirements, and thus reduce potential conflicts.

User friendly signage and mapping of the roads and trail system, also helps with compliance, enjoyment and reduced conflicts

Topic Question 3:

As we mentioned above, NPS should, without delay, close damaging unauthorized roads and trails, especially those leading to unauthorized river accesses.

The GMP also calls for closing about 5 miles of roads in primitive zones, replacing them with hiking trails. That should be done immediately.

The GMP also found 7 designated river crossings for horse trails, as well as 24 undesignated river crossings. All the undesignated river crossings should be closed immediately. The elevated levels of e. coli bacteria in the river, caused by horse traffic in the rivers, shows the need for quick action here.

The GMP indicated that there were 23 miles of designated horse trail in ONSR, as well as at least 90 miles of undesignated horse trails. The GMP calls for adding 25-45 miles of designated horse trails. The 90 miles of undesignated trails should be evaluated to see if any of those miles meet standards for the new designated trail miles. All other miles which do not should be closed.

When creating new trails or turning unauthorized trails into designated ones, the NPS should consider its ability to monitor, maintain and repair trail miles. Park staff, funds, volunteers and user group inputs are all factors.

ONSR has many natural, cultural and historic features which attract visitors. But the key features are the Current and Jacks Fork rivers. Providing trails that afford enjoyment of the river area, without damaging the riparian ecosystem is a challenge. We recommend placing most trail mileage above the 100 year flood mark.

Topic Question 4:

In 1991, the NPS conducted a Roads and Trail Study, which concluded that Alternative 3 should be the preferred alternative- this alternative called for closing 54 "traces" that provide duplicate access and/or no identifiable NPS function. It is time to act on at data, and close these roads. The GMP explicitly allows the NPS to take action without waiting for the entire Roads and Trails Study to be complete. The NPS should act now on the recommendations made 25 years ago.

The NPS should also implement the recommendations in the current GMP preferred alternative, to close & restore 40 miles of roads, close undesignated roads, traces, crossings, and river access points. The GMP allows closing on case by case basis without waiting and additional 2.5 years for this new Study to be completed.

There are too many roads that access the river, allowing trucks, ATVs, etc. unauthorized access. Roads to unauthorized access points need to be closed now at least to the extent needed to prohibit access, and considered for more complete closure segments.

Topic Question 5:

We recommend that the NPS consider factors that will prohibit off road motorized use, by trucks, ATVs etc, when updating its roads and trail plan. While licensed vehicles are permitted on county roads

within the park we strongly recommend against any additional access which could create opportunities for undesignated motorized use.

Local community input into roads and trail planning is important. But we encourage the NPS to reach well beyond the immediate ONSR area counties for opportunities to participate. Park data show that a majority of park visitors and visitor spending comes from beyond the immediate area.

Comments: A designated roads and trails system sets the stage for user participation in the park. A well designed plan will help determine how visitors achieve that balance between exploring and enjoying the park's natural and historic resources and the need to protect those resources for the future.

Looking back at the considerations in the 1991 Roads and Trails EA, one sees the same issues of user impacts, visitor numbers, visitor compliance with park guidelines, etc. at play today. However, in 2015 now those numbers are greater and mechanized options for land and river recreation have increased. The environmental considerations raised in the 1991 EA still apply, but now we have more visitor impacts and climate change well underway. Thus the need for a well-designed road and trail plan is greater than ever.

Thank you for the opportunity to comment scoping for the comprehensive Roads and Trails plan for the ONSR. We are submitting comments on behalf of the Sierra Club, Missouri Chapter. The Sierra Club is a conservation organization dating back to 1892 and has had an organized presence in MO since 1970. Our MO chapter includes over 8000 members in the state who are dedicated to the club's historic mission to "explore, enjoy and protect" the environment. Our members have enjoyed, explored and worked to protect the ONSR for many decades. We participated in the public input to the current GMP.

The ONSR greatly needs an updated, comprehensive roads and trails plan. The prior 1984 management plan failed to address this sufficiently. That resulted in an extensive 1991 Roads and Trails Study and EA, which was never implemented. Thus the ONSR has gone at least 31 years without an updated plan. That gap represents critically delayed stewardship.

As a proactive step to address stewardship needs, we strongly urge the NPS to immediately implement the roads and trails component of the new GMP which do not require further public analysis. That component is the closure and rehabilitation of unauthorized roads and trails which adversely impact the public resources of the park. In particular, those roads and trails which create unauthorized access points to the river should be a priority.

We look forward the NPS' continued planning process for this project and are dedicated to continuing our participation.

thank you for consideration of our comments.

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 95

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Correspondence Text

Topic Question 1:
Multi-use trails.

Topic Question 2:

I absolutely advocate multi-use trails, but not all trails are appropriate for all users. Some trails should be only open to hikers, some can be open to hikers and bikers, while others can only be open to hikers and equestrians, and many can support all three user-groups.

Topic Question 3:

Ability of the trails to support users, availability of volunteers to build, repair, and maintain those trails.

Topic Question 4:

Stiffer penalties for those who drive off designated roads.

Topic Question 5:

Take advantage of volunteer resources already available, support those organizations with education and tools, and encourage more people to volunteer. Too many people are under the impression that our trails build themselves... This is not something the NPS can do alone.

Comments:

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 120

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Correspondence Information

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Topic Question 1:
More Trail, More Overlooks, better tail marking and maps.

Topic Question 2:
A program to teach about trail etiquette, with organization that use trial. IE our Mountain Bike Camp teaching trail etiquette

Topic Question 3:
We have great river systems and access to them is hard sometimes. I would love for it to be easier.

Topic Question 4:
We have great river systems and access to them is hard sometimes. I would love for it to be easier.

Comments:

">

PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 234

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Topic Question 1:

I believe that this upper Current River is the diamond of the entire park. I also believe in keeping it as is with its private setting, which is part of why it is the diamond. That being said, I understand that it is not going to stay that way now. SO, let's work with the riders who go there to have their soul stirred while riding these trails. Let's have a staging area with a museum and trail riding ethics for people to see. It can include the history of the area along with how to leave no trace teachings. Provide places along the way to make it easy to picnic with your horse and enjoy the beauty. Have historical markers along the way that teaches people to respect the special places they are riding through in hopes to educate them to the importance of keeping this private, primitive, clean, natural ...and yes, enjoy. Work with the locals who have ridden these trails for generations before YOU deciding where they can ride. I am very happy to help with this and have many more ideas. Contact me.

Topic Question 2:

I love to mountain bike, but I have found that the horse drift away from the trails when the bikes come through. I have seen this at Babler State Park, Castlewood and now Greensfelder EQUESTRIAN Park. Please allow this for natural modes of transportation only being hooves and feet. Put in bike trails in another location. Perhaps the Devils Well area and lower.

Topic Question 3:

PLEASE, consider riding and/or hiking with the local riders who have been riding these trails for generations to help with this trail project. Not only will you find the best trails to designate but you will also be able to get some history knowledge from them. ALSO, I believe this will help more if the riders who have been riding there so long are encouraged to TRUALLY be included in this venture.

Topic Question 4:

Once again, Please ask the locals who have been there for generations, to ride with you and be included in this. They know the river best. Keep the history and teach about the area by including the stories of the landmarks and scenic spots. Do not take all of them. Allow the locals to continue going to their favorite places and work with them to include certain other areas for the public. Again, include natural historical material to encourage knowledge that will in hopes keep people respecting the beauty.

Topic Question 5:

Yes. I do not believe that the horses are the problem of contaminating or damaging the river. It is the mass of floaters. Go floating on a Saturday and watch for yourself. Education is the key here. Rules will not go over well. If you could include a museum such as what you started to have at Acres Ferry, you can include more about how to treat the land while riding, floating and hiking. Perhaps include a store in it as well for hikers and riders. Encourage trail manners and keep it as is as much as possible.

Comments: Please read my answers thoroughly. Personally, I wouldn't change one thing with the trails in this upper area. If you must, then work with the people who know this area the best. Include their stories that are rich with the history of this sacred part of the river. Too many rules will only take away from this beautiful area. Put your staging area at Acres Ferry where you already have the beginnings of this that could include the museum and store for providing history, stories, education, simple provisions that will help keep it natural. The same can be done primitively at Cedar Grove or Baptist Camp. However keep those very primitive and natural without too much change.

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PEPC Project ID: 56591, DocumentID: 68296

Correspondence: 255

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Topic Question 2:
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Comments: While we don't have any specific comments to offer at this time, we would like to request that we be included on the distribution list for future documents pertaining to this project, including the Environmental Assessment. Please submit future correspondence to tilley.amber@epa.gov, or feel free to contact me at 913-551-7565.

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