

## FRIENDS OF OZARK RIVERWAYS (FOR)

### CITIZEN GUIDE FOR COMMENTING OZARK NATIONAL SCENIC RIVERWAYS (ONSR) ROADS & TRAILS MANAGEMENT PLAN/ENVIRONMENTAL ASSESSMENT (Draft Plan) Comment Deadline 8-18-21

Friends of Ozark Riverways (FOR) has reviewed the ONSR Roads and Trails Management Plan/Environmental Assessment and considered its various management alternatives. We provide this summary of the alternatives and FOR's recommendations as a guide for individuals and organizations interested in commenting. We commend the National Park Service for addressing many of the issues that have been festering at ONSR for decades. Now is the time for all citizens who love parks and especially the Ozark Riverways to express your views and show your support for strengthened management of this wonderful park.

**Date of Release and Deadline for Comment.** A Preliminary Alternatives Newsletter and dozens of on-line maps were released to the public in late 2017 for a comment period that ended January 15, 2018. The full management plan/environmental assessment (draft plan) was issued June 18, 2021 with an initial July 18 deadline for comment, subsequently extended to August 18, 2021. For links to view or download a copy of the draft plan, to review detailed maps of NPS-designated roads and trails proposed for the various alternatives, and to submit comments, visit [http://parkplanning.nps.gov/OZAR\\_RTplan](http://parkplanning.nps.gov/OZAR_RTplan).

**What is Friends of Ozark Riverways (FOR)?** Friends of Ozark Riverways was formed in 2003 respectfully to promote stronger management of Ozark National Scenic Riverways (ONSR). FOR is an informal coalition of conservation, outdoor, and recreation-based organizations and businesses, along with thousands of their members, who support the National Park Service (NPS) mission to protect the outstanding natural beauty, ecological vitality, and rich cultural heritage of the Riverways so that visitors are rewarded with high quality experiences and the resources are protected unimpaired for future generations.

**Submitting Your Comments.** We ask everyone to encourage the strengthening of this park's management according to National Park Service standards. If well cared for, the Riverways will not only protect priceless natural and cultural resources but also provide substantial economic contributions to the region from both NPS and visitor spending, jobs, and added sales and other tax revenues and thus help sustain small communities along the rivers. In your comments, please use words that reflect your own particular experiences, interests and concerns as well as general issues and concerns discussed in this guide.

Comments must be submitted **by August 18, 2021 at 11:59pm Mountain Time** in one of these ways:

- Online: <https://parkplanning.nps.gov/document.cfm?parkID=158&projectID=56591&documentID=113284> ; click on "Comment Now" in the left margin.
- Or, by mail to: Superintendent, Ozark National Scenic Riverways, P.O. Box 490, Van Buren, MO 63965

**Background.** Ozark National Scenic Riverways, established by Congress in 1964, is Missouri's largest national park and America's first national river. There are 134 miles of the Current and Jacks Fork rivers in the park within Carter, Dent, Shannon, and Texas counties. National Park Service holdings include three major destinations that were originally state parks--Alley Spring, Big Spring, and Round Spring--and other lands acquired within the Congressionally authorized corridor. There are currently 51,654 acres of federally owned land interspersed with 29,131 acres of private and state land in the corridor, including more than 9,000 acres subject to scenic easements held by NPS. Many of the park's resources are globally significant and irreplaceable. As a unit of the National Park System, the purpose for management of ONSR is to protect these resources in an unimpaired condition for public recreation, education, and scientific value.

**Planning History and Alternatives.** The Roads and Trails Plan Alternatives are based on a General Management Plan (GMP) approved in 2014 after nearly a decade of spirited contention between those who wanted no change from current conditions, meaning essentially free rein for varied recreational users to go wherever and however they want, and those like FOR who wanted the park to be managed according to National Park Service standards and policies. Conditions as of 2014 included a maze of often poorly located, redundant, and eroded user-created roads, trails, river access points, campsites, and horse crossings far in excess of those intended in any previous plans. NPS planners found more than 90 miles of undesignated user-created equestrian trails and more than 39 miles of undesignated roads and traces since an earlier 1991 Roads and Trails Study, which had itself been undertaken by NPS to develop a protocol for closing unauthorized, user-created roads and trails (relatively few of which were subsequently closed). Others including FOR researchers identified more than 136 places where all-terrain vehicles could access the river, 164 places where equestrians entered the park, and 83 places where horses and their riders crossed the river, even though NPS policy prohibits ATV and equestrian use beyond designated roads and horse trails.

While the 2014 GMP did not satisfy all users, it was regarded by many—including most members of Friends of Ozark Riverways—as a reasonable compromise that, if successfully implemented, would bring ONSR into compliance with National Park System policies and standards. *Completion of a new Roads and Trails Plan is essential for implementation of this aspect of the 2014 GMP.* The 2014 GMP sets the standard for **Alternative A (the No Action Alternative) as well as Alternatives B and C**, providing that all *undesigned* roads, trails, river crossings, campsites or other recreational sites would be closed and restored to natural conditions.

**Alternative B (the NPS preferred alternative)** would reduce the mileage of designated public-use roads from 230 to 218 miles (mostly by converting 12 of the 72 miles of NPS public-use roads to horse trails), and provide 52 miles of new designated trails (16 for hiking; 25 miles for equestrians and hikers in the upper Current, which has NO designated horse trails at present; and 11 for biking (including e-bikes), plus a horse staging area at Cedar Grove and seven designated river crossings on the Upper Current, which has none designated at present.

**Alternative C** would provide 219 miles of public roads, 61 miles of new designated trails, including 6 miles of additional horse and hiking trails and two more horse crossings than alternative B.

**Both B & C** would provide designated camping areas for motor vehicle access to gravel bars at Logyard and Two Rivers and walk-in camping at certain other gravel bars, along with continued access by watercraft to gravel bar camping. Both B & C would also offer the possibility of developing 10 additional miles of equestrian/hiking trail loops outside NPS boundaries in partnership with neighboring landowners. Both B & C would implement a horse permitting system and permits for ATV and UTV use on some NPS roads in an effort better to manage and control burgeoning horse and ATV/UTV use.

For more details and comparison of the alternatives, see the draft plan and maps on the NPS planning website.

## Friends of Ozark Riverways Recommendations and Comment Guide

**FOR in general supports Alternative B**, with some caveats as indicated below. We regard Alt B as a responsible and environmentally and family friendly alternative that would provide for designated horse trails and horse crossings on the upper Current where there are none designated at present, while providing also for more hiking and some biking trails. Most important, it goes farther than the other alternatives in reducing motorized intrusion on gravel bars and riverbanks via unauthorized user-created roads and river crossings, reducing equestrian and ATV overuse and damage to resources. Most important, it would provide for ecological restoration of undesigned roads, trails, and river accesses and thereby improve resource integrity and visitor experience. We comment further on longstanding FOR concerns, and make recommendations for improvements that we believe would strengthen the plan.

**Close, physically block, and restore undesigned roads, traces, and equestrian trails and river crossings.** This step is critical, and it must proceed in tandem with the designation of roads, recreation sites, and equestrian trails and crossings. Many equestrians as well as other visitors would appreciate the elimination of the confusing, unsightly, often rutted and eroded maze of user-created trails and accesses to riverbanks and gravel bars, combined with sensitive siting, redesign, and signing of those that are designated.

**Limit motorized intrusions to gravel bars and riverbanks.** FOR's major concern throughout the GMP process has been the numerous user-created accesses for equestrians and motor vehicles (including RV campers). We support NPS planners' intent to greatly limit these intrusions by prohibiting driving onto or camping with vehicles on gravel bars, with two exceptions in designated areas at Two Rivers and Logyard gravel bars. We strongly urge that parking for other designated recreational sites, whether for day use or primitive camping, be located well back from the gravel bar in wooded areas screened from view from watercraft on the river; parking areas should be clearly defined and limited to the carrying capacity of the sites, and overflow parking along roads should be prohibited. The same, we believe, should apply to other wooded riverbanks; that is, no motor vehicles visible along the bank from the river, except at designated launch sites and designated roads.

**Designate some—perhaps up to 25 percent—of the recreation sites for access from the river only, to provide canoe camping at sites where there may not be adequate gravel bar camping nearby.** This is commonly done at other state and national scenic rivers. In general, we think those on the right descending bank of the river between Baptist Camp and Round Spring should be closed or accessed only from the river, since at least one side of the river on the upper Current should be free of motorized intrusion. This is particularly the case at the Welch area across the river from Welch Spring; significant development is already concentrated on the left bank near the spring and hospital, and visitors there and passing by on the river should not also be assaulted by development on the other bank.

**Design sustainable equestrian trails and strictly limit river crossings in the upper Current River area.** Because equestrian use has increased dramatically in this area in recent decades on a maze of user-created trails and there are currently no designated trails, it is critical to designate carefully sited trails far enough back from the river to minimize erosion and discourage

unpermitted horse access to and crossings of the river. We believe it is not feasible to provide more miles of trail and crossings of the river than indicated in alternative B; indeed, we think seven horse crossings in this limited area may be too many and we do not think there should be trails on both sides of the river in the same stretches, particularly upstream from Cedar Grove, where there is so much fishing activity. We encourage the suggested loops on the north and east side of the river through partnership agreements with neighboring landowners as a way to provide more miles for equestrian use without degrading the visitor experience for the far greater number of hiking, boating, and angling visitors within this narrow corridor. Other nearby opportunities for equestrian travel are on the Mark Twain NF and the Angeline Conservation Area.

**We support the proposed equestrian permit system.** Permits should be issued to individual riders for designated days and areas in order to avoid overuse and conflict with other visitors. This is a common practice in other national parks and elsewhere, especially for high impact uses. **We understand the need for a horse staging area at Cedar Grove, but we oppose any additional horse staging areas** or any overnight horse camping in the narrow corridor of NPS-owned land or along loop trails. **We also oppose any additional designated horse trails, especially below Akers as in Alt C.** We understand equestrians' desire to visit historic structures and other special sites, but horses should not be allowed near the sites; fences or hitching racks could be provided at an appropriate distance from the sites so that horses could be tied while riders walk to the sites.

**Limit ATV/UTV uses. We support the proposed permitting system for use of ATVs or UTVs on county roads in the Riverways corridor** (as allowed by state law), but **we urge ONSR not to allow ATV/UTV use on most NPS-administered roads**, except where absolutely necessary, in order to avoid conflict with other park visitors. **Permit fee revenues should be used to help maintain park infrastructure and for related recreation and restoration expenses.**

**Provide more hiking trails.** Most of the new equestrian trails proposed for the upper Current are designated for hiking as well as equestrian use, but most hikers do not like walking on heavily used horse trails and the frequent river crossings are not feasible for most people on foot, so for hikers the trails are snippets only. We applaud the new Upper Current Section of the Ozark Trail from Blair Creek to Round Spring and its extension to Echo Bluff and Current River State Parks. **This partnership approach across multiple ownerships might well be applied in extending the trail to Pulltite in this R&T planning cycle.**

**Carefully manage bike trails.** At Pulltite, there is a proposed bike trail sharing part or all (not clear) of the nature trail, which we think is extremely problematic and dangerous for families with children moving slowly on the nature trail. We also strongly oppose the proposal in Alt C to allow mountain bikes to share a portion of the Ozark Trail, as this would require a wider tread that is counter to the spirit of the Ozark Trail. On the old tram road to Big Spring, however, the tread is already wide enough, so a shared hiking/biking trail could work. There are also ample gravel county roads beyond the park for biking.

**Protect the Big Spring wilderness resource.** FOR endorses full protection for the 4500-acre Big Spring area south of Van Buren (shown as a "primitive zone" on the map in Figure B-1), which adjoins 3100 acres of adjacent U.S. Forest Service land. It conserves the only potential wilderness area within the Current River watershed. The wild land character of this unique area and the non-motorized recreation enjoyed on its trails will be protected best under Alternative B.

**Defend scenic easements on public and private lands within the congressionally authorized ONSR boundaries.** With more than a third of the total land within the authorized boundaries of ONSR owned by private or other public entities, we encourage ONSR to bring private owners and agency leaders together to discuss ways in which they might best cooperate with NPS and among themselves in support of appropriate uses and to prevent inappropriate uses or trespass on easement lands.

**Protect the free-flowing river.** We encourage efforts to remove unnecessary fords and obstructions along the rivers, such as the concrete low-water crossing at Cedar Grove, and work with MoDOT on solutions.

**Summary Comments.** The National Park Service deserves support for its commitment to dealing with serious problems that have developed over the years. However, ONSR has seen a severe reduction in staff in recent decades owing to decreases in funding, and there is no guarantee that funds will be enhanced to the levels required by the plan. **We encourage citizens to support increased funding for ONSR** to accomplish the important management, enforcement, and restoration work ahead.

**This is also why we favor Alt B rather than Alts A or C.** We believe that for ONSR to get any additional funding for closing and restoring undesignated roads, ATV/UTV traces, horse trails, and river crossings, it would need to be paired with funding for new designated equestrian and hiking trails, especially in the upper Current River area. That is a major reason, in addition to avoiding user conflict and improving the quality of visitor experience, for cautioning against the greater miles of designated roads, trails, and recreation sites in Alternative C that would require more funds for development and increases in staffing to monitor resources and provide enforcement. We favor maintaining visitor numbers at approximately the current level while emphasizing improvements that are less staff-intensive and more conducive to family recreation.

**Above all, we encourage all citizens who care about the future of the Riverways to submit written comments on this plan by August 18.**

**Friends of Ozark Riverways.** The following organizations and businesses from across Missouri have affiliated with FOR in its efforts on behalf of this outstanding national park, but all are encouraged to express their own independent views on matters of particular concern:

**Al Agnew, Wildlife Art**  
**Alpine Shop**  
**American Rivers**  
**Burroughs Audubon, Kansas City**  
**Columbia Audubon**  
**Conservation Federation of Missouri**  
**East Ozarks Audubon Society, Farmington**  
**Greater Ozarks Audubon, Springfield**  
**Great Rivers Environmental Law Center**  
**L-A-D Foundation**  
**Missouri Archaeological Society**  
**Missouri Coalition for the Environment**  
**Missouri Parks Association**  
**Missouri Smallmouth Alliance**  
**Missouri Wilderness Coalition**  
**National Parks Conservation Association**  
**Open Space Council, St. Louis**  
**Ozark Fly Fishers**  
**Ozark Greenways, Springfield**  
**Ozark Mountain Paddlers, Springfield**  
**Ozark Society, Schoolcraft Chapter**  
**Ozark Wilderness Waterways, Kansas City**  
**Pioneer Forest, Salem**  
**River Bluffs Audubon, Jefferson City**  
**Sierra Club, Missouri Chapter**  
**St. Louis Adventure Group**  
**St. Louis Audubon**  
**St. Louis Canoe and Kayak Club**  
**The Nature Conservancy in Missouri**