

FRIENDS OF OZARK RIVERWAYS (FOR)

CITIZEN GUIDE FOR COMMENTING THE OZARK NATIONAL SCENIC RIVERWAYS (ONSR) DRAFT GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT 1-9-14 [dates revised]

Friends of Ozark Riverways has reviewed the draft General Management Plan (GMP) and considered its various management alternatives. We provide this summary of the 512-page plan and its alternatives as a guide for those interested in commenting. We applaud the National Park Service for addressing many of the issues that have been festering at ONSR for years. Now is the time for all citizens who love parks and especially for all who have ever visited the Riverways to make your views known.

Date Of Release And Deadline For Comment. This plan was first released to the public on Friday November 8 for a public comment period subsequently extended to February 7, 2014. To view or download a copy of the plan and to comment, visit <http://parkplanning.nps.gov/ozar>

What Is Friends Of Ozark Riverways (FOR)? FOR formed in 2003 to promote respectful management of Ozark National Scenic Riverways. FOR is a coalition of conservation, outdoor, and recreation-based organizations and businesses, along with thousands of individuals who share the mission to protect the outstanding natural beauty, ecological vitality, and rich cultural history of the Riverways so that visitors are rewarded with high quality experiences and future generations will have the same opportunity.

We ask everyone to encourage the strengthening of this park's operation. 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 jobs, visitor spending, added sales tax revenue, and national park expenditures and thus sustain small communities along the river.

Submitting Your Comments. You should use words that reflect your own particular experience, interests and concerns. You may submit comments (by February 7, 2014) in three ways:

- Online using the following link: <http://parkplanning.nps.gov/ozar>
- By mail to: Ozark National Scenic Riverways, 404 Watercress Drive, P.O. Box 490, Van Buren, MO 63965
- By attending one of four public meetings: January 16, 2014, 6pm at Eminence High School New Gym; Jan 17, 6pm, Salem City Hall Auditorium; Jan 21, 6pm, at Van Buren Youth & Community Center, Jan 22, 6pm, in St. Louis at the Powder Valley Conservation Center in Kirkwood.

Background. Ozark National Scenic Riverways is Missouri's largest national park, and it is the country's first national river. It was established by Congress in 1964. There are 134 miles of the Current and Jacks Fork rivers in the park within Carter, Dent, Shannon, and Texas counties. The Riverways includes lands that were originally state parks (Alley Spring, Big Spring, and Round Spring); other lands were added after the park was established, and today its size and the quality of its resources are truly national in scope. Our review is focused on the long-term stewardship of the stunning beauty of the Riverways, its outstanding springs and caves, its diverse and widely recognized wildlife, its important cultural resources and landscapes, and the river-based recreational experiences provided by its free-flowing and high quality rivers. Many consider these resources to be globally significant and irreplaceable. As a unit of the National Park System, the purpose for management of Ozark National Scenic Riverways is to protect these resources in an unimpaired condition for public recreation, education, and scientific value.

Plan Approach and Alternatives. The plan proposes management zones for land and water uses that vary in extent for each of three alternatives. The land-based zones are: developed, resource-based

recreation, natural, and primitive; mixed-use, seasonal mixed-use, and non-motorized river-based zones. The zones, which will guide decisionmaking, are designed to achieve certain resource conditions and visitor experiences. See maps of the zones for each alternative on pages 61, 67, 75, and 81 and a comparison of alternatives in Table 13 on pages 125-130 of the GMP (or the Summary of Key Excerpts).

Each of the action alternatives provides for:

- A mix of recreational and interpretive activities;
- More effective distribution of concession drop-off/pickup points for watercraft to reduce crowding;
- Year-round nonmotorized watercraft use, motor-free zones, and zones for year-round or seasonal motorized watercraft use (see Table 4 in the plan or plan excerpts);
- Management of roads, river access points, and land access to gravel bars by zones;
- Ecological restoration projects including restoration of undesignated roads, traces, trails, and river access points and crossings;
- Preparation of a horse use and trail management plan (and possible permit system), improving and adding more designated horse trails, and closing and restoring many informal trails;
- Increasing law enforcement for compliance;
- Restoration of historic structures and cultural landscapes;
- Continued maintenance of the Big Spring's natural, primitive character to maintain its wilderness eligibility;
- Adding more trails accessible to those with disabilities;
- Allowing mountain biking on designated trails;
- Allowing for new concessions for overnight activities such as guided float trips and guided backcountry hiking trips;
- Partnering with state officials to enhance healthy game fish populations;
- Partnering with counties on road management and with state officials to enhance healthy fish and wildlife populations, organizing a national park advocacy group for the Riverways, and various other partnerships;
- Construction of various new park operational facilities.

Establishing the priority for programs and projects and determining the means of implementation will depend on funding and more specific planning.

Here are the differences between the various management alternatives, with special emphasis on those most relevant to priority concerns of Friends of Ozark Riverways: especially reducing motorized intrusion via unauthorized roads and river access points, reducing equestrian overuse and damage to resources, and providing for ecological restoration and improved visitor experience. For a more complete comparison of the alternatives, see Table 13 and the maps of the alternatives.

No Action Alternative. This alternative is not a plan alternative but a description of current resource conditions and trends, existing park recreation, development, and service; it serves as a baseline against which to compare the three action alternatives.

This park's problems have included the seemingly ever-expanding presence of motorized vehicles and their maze of eroded tracks in riparian areas and on gravel bars; the explosive growth of equestrian use and proliferation of undesignated trails and river crossings (many of which are in sensitive riverine areas or on steep, heavily-eroded slopes); overcrowding in certain reaches of the rivers and resulting conflicts among user groups, coupled with the rowdy behavior of some visitors; and inadequate monitoring and enforcement of scenic easements. Doing nothing would result in further degradation of resources and conflict among uses, and diminish the economic potential that a well-managed national park, its scenic landscapes, and clean streams and rivers can provide.

Alternative A. This alternative, identified by NPS as the **environmentally preferable alternative**, emphasizes traditional, nonmechanized recreation and visitor experiences that are quieter, less crowded, and slower-paced. To reduce motorized intrusion it would close unauthorized roads, traces, and river accesses, restore 50 miles of such roads to native vegetation, replace 15 miles of undesignated roads within primitive management zones with hiking trails, and no longer allow motor vehicles on gravel bars (though walk-in day use and camping would be allowed). To reduce equestrian overuse it would add 25 more miles of designated horse trails, close and restore 65 miles of undesignated horse trails, improve the design of the 23 miles of currently designated horse trails, and consider establishing a permit system for horse use within the park. To improve visitor experience and reduce conflict among uses there would be more hiking trails, more motor-free zones, and redistribution or limit of commercial services. There are some staffing increases.

Alternative B (NPS Preferred). This alternative would enhance opportunities for visitors to learn about the park's natural and cultural resources, and provide a balance of diverse recreational opportunities with increased opportunities for education and appreciation of park resources. To reduce motorized intrusion it would close undesignated roads and access points, restore 45 miles of such roads to natural condition, convert 10 miles of roads in primitive zones to hiking trails, and reduce and designate campsites on gravel bars open to vehicles. To reduce equestrian overuse it would add 35 miles of designated horse trails, close and restore 65 miles of undesignated horse trails and unauthorized river crossings, improve the design of the 23-mile-long currently designated horse trail system to avoid sensitive areas, establish a permit system for horse use within the park, and may allow for designated horse camping sites. To improve visitor experience there would be a new learning center and visitor contact station at Powder Mill; two additional campgrounds at existing day use areas at Akers on the Current and Blue Spring on the Jack's Fork; additional trails; a resumed oral history program, discovery sites, and enhancement of archive and museum collections; and strengthened monitoring, research, and preservation projects. The Cedar Grove low water crossing would be replaced with a high-water bridge. Waste systems in the park would be improved. There are staffing increases under this alternative.

Alternative C. This alternative would accommodate higher levels of park visitation and more intensive recreation while striving to maintain the scenic natural setting and protect cultural resources. To reduce motorized intrusion it would close undesignated roads and access points, restore 40 miles of such roads to natural conditions, replace 5 miles of roads in primitive zones with hiking trails, and allow vehicular access only to designated sites on gravel bars. To reduce equestrian overuse it would add 45 miles of designated horse trails, and close 65 miles of undesignated trails and river crossings; it might also develop a 25-unit horse camp along the Jacks Fork. Visitor experiences would include two additional campgrounds, possibly more backcountry and primitive campsites, more interaction among visitors, and higher resource impacts especially in higher use areas. Staffing levels would increase the most under this alternative to provide for more use and more monitoring and mitigation of impacts to resources.

FOR Recommendations. FOR agrees with NPS that **alternative B provides the most balance** among the three alternatives, though some of our organizations and members may favor the environmentally preferable alternative A or a mix of elements from alternatives A and B. Alternative B would provide more staff for maintenance, monitoring, and enforcement while substantially enhancing visitor experience of park resources. We believe that several improvements could strengthen the plan:

- **Scenic Easements.** Although there are no changes to scenic easements proposed in this plan there are 9,257 acres of scenic easements that are intended to maintain the natural environment and scenery for the benefit of the visiting public. These easements are critical to the quality of the Riverways. They were acquired to add public value to the national park and need to be effectively monitored in a timely manner. Easement violations must be corrected promptly.

- **Wilderness.** The GMP review includes one small, undeveloped backcountry/wildland area of approximately 3400 acres near Big Spring. The area, which was acquired as a state park in the 1920s and later became part of the ONSR, has been continually managed as an undeveloped wild area and we support that approach. We also support the use of prescribed fire to manage wildland quality. The NPS is proposing in each alternative to recommend some portion of the Big Spring area as qualified for federal wilderness protection. Management would continue largely unchanged as it has been but with the recognition that it can provide a true wilderness experience, which would be an addition to riverways offerings. We support the NPS-preferred Alternative B, which recommends 3430 acres for wilderness management, while recognizing that official designation as federal wilderness is beyond the scope of the ONSR plan.
- **Horsepower limit:** Zoning for horsepower limits has been part of existing regulations since the River Use Management Plan of 1989. FOR supports the balanced approach of motor-free zones for upper reaches of the Current and Jacks Fork rivers and seasonal or year-round provision for motors on other reaches as proposed in Alternative B. (NPS recognizes that the present and proposed 60/40 horsepower limit is in violation of the Code of Federal Regulations and is proposing a rule-change process in order to continue allowing it.)
- **Hiking Trails.** There are so few hiking trails in this park and the additional miles provided in each alternative (15 miles at best) are so small that we suggest asking the number be increased and urging NPS to partner with other agencies and organizations to develop hiking trails across multiple ownerships.
- **Horse Campground.** A horse campground (25 sites) is proposed for alternatives B and C. Instead of a new development of this magnitude, we ask that NPS work with existing local businesses to provide a concession horse camping operation outside the park that would have less impact on park resources within the narrow river corridor.
- **Natural and Cultural Resource Management.** FOR strongly supports the protection, restoration and interpretation of natural landscapes, archaeological sites, historic structures, and cultural landscapes as discussed in this plan. However, our support for cultural landscape restoration is limited to the immediate viewshed of historic sites. Restoring and stabilizing the forested riparian corridor should be emphasized, especially in view of the likely impact of climate change and severe weather events on the rivers and floodplains. There should be no new conversions of bottomland riparian forests to open fields, and artificial pasture for elk and other wildlife should be eschewed; restoration of upland meadows, woodlands, and glades should be with native vegetation.
- **Riverbank issues.** Impaired riverbanks should be restored. Developed facilities along the rivers should be carefully considered, screened from view from the river wherever possible, and low impact. We suggest that heavily engineered solutions be avoided (e.g., rock and weirs) but that NPS talent and experience be called on to bring to this park natural landscape design and sustainable structures appropriate to the site.
- **Prioritize Solutions for Problem Areas.** One such problem area is across from Welch Spring. Park development has been concentrated on the left bank descending from Cedar Grove to Akers Ferry. The sizeable river bottom along the right bank is remote and undeveloped but has been overrun and severely degraded by motor vehicles on a maze of unauthorized, heavily rutted roads and traces. This area should remain undeveloped and its seriously impaired places restored. Damaged areas such as these should not serve as opportunity to add new 'hardened' development where it does not belong. This sizable area should serve as a high quality visual resource for floaters and for other users viewing it from the developed area (historic structures, accessible walking trail, boat launch and vehicle access) long established at Welch Spring.
- **Annual Visitation and Economic Influence.** Visitation is about 1.3-1.5 million each year. A 2011 study estimated visitor spending at \$55,445,000, more than 88 percent of which is by non-local visitors. This spending combined with NPS employment accounted for 845 jobs, or 16 percent of total employment in Shannon and Carter counties. We support this high-value investment in the Ozark region of south-central Missouri, understanding that a well-managed park and the visitors

it attracts may be the most important contributors to the long-term economic health of local communities.

Summary Comments. Though people will differ in their views of which alternative is best, we believe that the National Park Service has provided a very reasonable range of alternatives in this plan and deserves support for its commitment to dealing with serious problems that have developed over the years. However, the Riverways has seen a 30 percent reduction in staff in the last decade, owing to decreases in funding, and there is no guarantee that funds will be enhanced to the levels anticipated by the plan alternatives. That is one reason for cautioning against the increased development and more intense recreational use in Alternative C that would require more increases in staffing to monitor resources and provide enforcement. We favor maintaining visitation 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 attend one of the public meetings and to submit written comments on this plan by February 7.

For Further Information. To download the plan and other background material on the planning process, visit <http://parkplanning.nps.gov/ozar>. For an NPS summary and excerpts from the plan (including Table 13 and maps of the alternatives) and other helpful material, including FOR's Framework for Reform, Current River video, Citizen's Guide for Commenting, and various reports, visit the websites of FOR: www.friendsofzarkriverways.org or MPA: <http://parks.missouri.org/IssuesAction/CurrentRiver.aspx>. For up-to-date information, visit FOR's Facebook page: <https://www.facebook.com/CurrentRiverFriends>.

Friends of Ozark Riverways. The following organizations and businesses from across Missouri have officially endorsed FOR and its work on behalf of this outstanding national park. We encourage you to submit comments to the National Park Service by February 7.

Al Agnew, Wildlife Art
Alpine Shop
Audubon Missouri
Conservation Federation of Missouri
East Ozarks Audubon Society
Environment Missouri
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
Open Space Council St. Louis
Ozark Fly Fishers
Ozark Greenways, Springfield
Ozark Mountain Paddlers, Springfield
Ozark Society (Missouri, Arkansas, and Oklahoma)
Ozark Wilderness Waterways Club, Kansas City
Pioneer Forest, Salem
St. Louis Adventure Group
St. Louis Canoe and Kayak Club
Sierra Club, Missouri Chapter
The Nature Conservancy in Missouri