

POTAWATOMI STATE PARK

Road Widening & Smart Growth Compliance Analysis

Inconsistencies Between the DNR Master Plan and Current Road Alterations
Door County, Wisconsin | May 2026

Executive Summary

Potawatomi State Park is currently widening and straightening park roads in a manner that directly contradicts the Wisconsin DNR Northern Lake Michigan Coastal Regional Master Plan (the "Master Plan"). The Master Plan, adopted under Wisconsin's Smart Growth planning legislation (Wis. Stat. § 66.1001), classifies park roads as 'Moderately Developed' and explicitly directs that they be maintained at current development levels — not upgraded. Any material amendment to the adopted plan requires a public hearing. No such hearing has been held. This document catalogs the specific plan language that the road-widening project violates.

1. Wisconsin Smart Growth Law — Public Hearing Requirement

Wisconsin's Smart Growth law requires local and state agencies that adopt a comprehensive plan to hold a public hearing before amending that plan in any substantive way. The Master Plan is the governing document for Potawatomi State Park. Road reclassification from Moderately Developed to Fully Developed — through physical widening and straightening — constitutes a material amendment to the plan's infrastructure classification and management prescriptions. No amendment process and no public hearing have occurred.

2. Road Classification: Plan Says 'Moderately Developed' — Actions Are 'Fully Developed'

What the Plan Says (Table 16, p. 41):

The Master Plan's Table 16 inventories and classifies all park roads across four categories: Primitive, Lightly Developed, Moderately Developed, and Fully Developed.

Road Classification	Miles Public Roads	Miles Closed Roads	Miles Seasonal Roads
Primitive	0	0.85	0.09
Lightly Developed	0	0.03	0
Moderately Developed	4.42	0.10	5.29
Fully Developed	0	0	0

Key Finding:

The plan records ZERO miles of Fully Developed roads. All 4.42 miles of public roads are Moderately Developed. Widening and straightening to full engineered standards effectively reclassifies them as Fully Developed — a category the plan does not authorize.

3. Short-Term Prescriptions: Maintain Roads, Not Upgrade Them**Direct Quote (p. 43, Short-Term Prescriptions):**

"Maintain existing roads and parking lots at current development levels to provide access to existing recreation opportunities."

This is explicit: roads are to be maintained at CURRENT development levels. Widening and straightening goes well beyond maintenance — it constitutes capital development directly contradicting the short-term prescription adopted in the plan.

4. Long-Term Prescriptions: Trail System, Not Road Upgrades**Direct Quote (p. 43, Long-Term Prescriptions):**

"The existing trails for Potawatomi State Park will be redesigned to create a more efficient and sustainable trail system... Parking lots and trailhead support facilities will also be improved as needed to serve the new trail system."

Road widening is conspicuously absent from the long-term prescriptions. Only parking lots and trailhead facilities are authorized for improvement — not road corridor widening or realignment.

5. NR 44 Classification Prohibits Higher Development Intensity**Direct Quote (p. 43):**

"The level of development, open and closed status, and miles of roads will remain consistent with the Land Management Classification."

The plan explicitly links road development levels to the NR 44 Land Management Classification. Upgrading roads beyond Moderately Developed exceeds the classification framework the plan adopts.

6. Niagara Escarpment: 200-Foot Buffer Prohibits Soil Disturbance**Direct Quote (pp. 46-48, Areas 2, 3, and 4 Management Prescriptions):**

"Within a 200-foot buffer zone of the escarpment face, do not conduct management or development (e.g., timber harvesting, new parking lot or building construction), or allow uses that would disturb soil and forest canopy cover and negatively impact the core habitat area of

the Niagara Escarpment."

Road widening involving grading and soil disturbance near escarpment-adjacent zones violates this buffer rule across three management areas totaling 557 acres.

7. Rare Species Protection: Road Work Triggers Prohibited Impacts

Direct Quote (p. 46, Area 2 Management Considerations):

"Impacts from activities that disturb the soil or open the forest canopy can create warmer and drier conditions, increase sedimentation, introduce invasive plant species, and cause vent compaction, all of which adversely affect the rare snails... These vents are vulnerable to compaction and filling-in."

Road widening involves exactly the soil disturbance and canopy disruption the plan identifies as threatening to state-threatened and endangered snail species. This is a binding management consideration, not advisory.

Summary of Plan Violations

Short-Term Prescription	Maintain roads at current development levels	Widening and straightening roads beyond current classification	p. 43
Table 16 Road Classification	0 miles Fully Developed; 4.42 miles Moderately Developed	Physical upgrades effectively reclassify roads as Fully Developed	p. 41
Long-Term Prescriptions	Improve parking lots and trailhead facilities only	Road corridor alterations not authorized anywhere in the plan	p. 43
NR 44 Consistency	Development levels remain consistent with Land Management Classification	Upgrade exceeds Moderately Developed classification ceiling	p. 43
Escarpment Buffer (Areas 2-4)	No development or soil disturbance within 200-ft buffer	Road grading causes soil disturbance in protected buffer zones	pp. 46-48
Rare Species Protection	Avoid soil disturbance causing vent compaction for rare snails	Grading and widening disturbs soil and forest canopy	p. 46
Smart Growth / Public Hearing	Plan amendments require public hearing before implementation	No public hearing held; no amendment process initiated	State Law

Conclusion and Requested Action

The road widening and straightening currently underway at Potawatomi State Park is inconsistent with the adopted Master Plan on at least seven documented grounds. The most fundamental violation is the failure to hold a public hearing before undertaking work that materially departs from the plan's road classification and maintenance prescriptions, as required by Wisconsin's Smart Growth legislation.

The requested action: halt the road alterations and initiate the plan amendment process under Wisconsin Smart Growth law, including proper public notice and a public hearing, before any further work proceeds.

Source: Northern Lake Michigan Coastal Regional Master Plan, Wisconsin DNR — Chapter 2, Management, Development and Use, Potawatomi State Park section (pp. 39-49). Document accessed via widnr.widen.net.