

# **Blue Mound State Park Action Alert!**

The Natural Resources Board (NRB) is proposing to reconsider its Jan. 27, 2016 vote approving a Blue Mound State Park (BMSP) Master Plan Amendment that created a 1.4-mile snowmobile trail and rerouted the ski trails.

**When:** 8:30 Wednesday, January 25, 2017 at the Natural Resources Board meeting

**Where:** Room G09, State Natural Resources Building (GEF 2)  
101 South Webster Street  
Madison, Wisconsin

**Action Needed:** Silent sport enthusiasts must ask the NRB to reconsider their previous BMSP Master Plan approval and let them know that they do not support creation of snowmobile trails in Blue Mound State Park and rerouting of the existing ski trails. Both written comments submitted prior to, and oral testimony presented at the NRB meeting, are needed. The DNR has stated that there is equal support for both snowmobiling and silent sports at BMSP, based on previous citizen input, so it is critical that they now hear from the silent sport community. You need to submit new comments even though you may have previously submitted them.

Please have your friends and all members of your household submit separate individual comments to the NRB. **Even if you support the previous NRB approval of the mountain biking trails, please support the skiers and snowshoers by opposing the establishment of the snowmobile trail.**

1. The NRB must receive your written comments asking for reconsideration of their BMSP master plan approval and opposition to the creation of snowmobile trails at BMSP **before 11:00 a.m. on Friday, January 13, 2017.** The comments can be emailed to: [laurie.ross@wisconsin.gov](mailto:laurie.ross@wisconsin.gov) or mailed to:  
Laurie J. Ross, Board Liaison  
Office of the Secretary, Wisconsin DNR  
[Laurie.Ross@wisconsin.gov](mailto:Laurie.Ross@wisconsin.gov)  
608-267-7420  
PO Box 7921  
Madison WI 53707-7921

(see procedures below)

2. Oral comments at the Wed., Jan. 25, 2017 NRB meeting are needed. There were very few silent sport supporters at the earlier NRB meeting. Many more people are needed this time. You must register to speak by 11:00 a.m. on Friday, January 20, 2017. Send your request to register to speak to the same email or address for the written comments above.

When submitting a written comment, or registering to testify, please provide the following information to the Board Liaison (Laurie Ross):

1. Your Name
2. Name of organization(s) you represent (if none, state that you are "representing self").
3. Refer to **agenda item 2.B.9.**, and your statement supporting reconsideration of the earlier NRB BMSP master plan approval and opposition to the creation of the snowmobile trail and rerouting of the ski trails.
4. City, village or town of residence.
5. Phone number.
6. Email or mailing address, so the Board Liaison can confirm your registration to testify or reply to your written comment.

Further information about this issue can be found at:

<http://dnr.wi.gov/about/nrb/agenda.html> and its links:

[January 2017 Natural Resources Board agenda \[PDF\]](#)

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1. [1\) BMSP - 2014 Comments](#)
2. [2\) BMSP- July-Aug 2015 Comments](#)
3. [3\) BMSP-Comments-Nov-Dec-2015.pdf](#)
4. [4\) BMSP Draft Master Plan Amendment Hearing transcript 12\\_1\\_15](#)
5. [5\) BMSP 2015b change.org Dec2105](#)
6. [6\) BMSP 2015c corp Dec2015](#)
7. [7\) BMSP Jan 2016](#)
8. [8\) BMSP blm Nov 2016 comments](#)

## **Please Help Fund the Legal Challenge to the Approval of BMSP Plan Amendment (see below)**

Karl Heil and Kenneth Wade have retained the legal services of the Pines Bach law firm to conduct their legal actions opposing the NRB approval of the BMSP Master Plan Amendment. Please consider joining their efforts with a donation to:

Blue Mound State Park Silent Sport Supporter

c/o Karl Heil, 4553 County Rd. HH, Barneveld, WI, 53507

1. You can contact Karl Heil at 608-924-1447, email: [towers@mhtc.net](mailto:towers@mhtc.net)
2. You can contact Ken Wade at 608-767-311, email: [kenneth.wade@tds.net](mailto:kenneth.wade@tds.net)

## **Background Information:**

In 2014, at the request of Association of Wisconsin Snowmobile Clubs, the Wisconsin Department of Natural Resources (DNR) began developing a proposal to create a snowmobile trail through BMSP. Many silent sport enthusiasts voiced opposition to the proposal at various points in the process (See Karl Heil, Ken Wade and Friends of Blue Mound State Park detailed master plan comments below). The NRB approved the BMSP master plan with the snowmobile trail on January 27, 2016.

## **Karl Heil and Ken Wade Legal Challenge Prevented Snowmobile Trail Construction**

On February 25, 2016, Karl Heil and Kenneth Wade filed a petition in Dane County Circuit Court against the DNR, challenging the procedures and factual basis the DNR used to make its decision. Karl Heil is the former superintendent of BMSP, well-known for his dedication to providing the excellent silent sport recreational opportunities presently enjoyed at the park. His dedication to the park has continued with his participation with the Friends of BMSP, including organizing the park fundraiser, the Horribly Hilly Hundreds Bicycle Challenge. Ken Wade lives in the Pleasure Valley area near BMSP and formulated the "Pleasure Valley Watershed Protection Plan" in 1990. Through coordination with the DNR, Dane County, Town of Vermont, The Prairie Enthusiasts and other area landowners, Ken has helped to

protect 600 acres of land connecting to Dane County Brigham and Blue Mound State Park, providing for a 5.5-mile environmental corridor. Ken is actively engaged with habitat restoration within the corridor.

Both Karl and Ken are local area silent sport enthusiasts, including skiing and biking.

Due to the master plan legal challenge, the DNR has not constructed the approved snowmobile trail.

### **Open Meetings Complaint**

Through the documents provided as part of the master plan challenge, it was found that the NRB likely violated Wisconsin's open meeting laws prior to their meeting approving the master plan amendment. DNR emails show that DNR NRB members were briefed, lobbied and their votes tallied prior to the board meeting. Citizens interested in the proposed Blue Mound Park master plan do not know what was discussed when DNR met or communicated with board members, but it appears they were lobbying for amending the plan to include the new snowmobile route through the park. Since the DNR discussions with the board were not open to the public, we can't know upon what the board based its decision. Public opportunities for influencing board decisions were undermined and their value diminished. This was reflected in the content and scope of the discussion of the plan amendment at the board meeting where there was little to no discussion on many of the very contentious and substantive issues raised. It appeared as if most of the significant discussion occurred prior to the meeting and behind the scenes. The non-public meetings and communication with NRB members prior to the open meeting resulted in the open meeting becoming an empty exercise.

On November 4, 2016, Karl Heil and Kenneth Wade filed a complaint in Dane County Circuit Court indicating the NRB was in violation of Wisconsin's open meeting laws, and asking that the January 2016 NRB master plan approval be voided. The complaint also alleged that the NRB's notices for closed session meetings are impermissibly vague.

### **Karl Heil Comments – Proposed BMSP Master Plan**

3. Karl Heil
4. Representing self
5. Agenda Item 3.B.5. Approval Request Blue Mound State Park Master Plan Amendment
6. Barneveld, WI
7. 608-924-1447
8. [towers@mhtc.net](mailto:towers@mhtc.net)

I am OPPOSED to the proposed construction of a snowmobile trail (or route)\* through Blue Mound State Park (BMSP) and I am OPPOSED to the relocation of the Mounds Park Road trail crossing and Planned Multi-Use Trail Alignment

\*DNR maps refer to the proposal as a Route, when in fact it meets the statutory definition of a Trail

My reasoning is as follows:

**No need for a new snowmobile trail exists:**

- there already exists a signed club snowmobile trail along the Mounds Park Road right of way which has DNR and Township approval and traverses the same area as the proposed trail

-the current route meets the needs of the club as indicated in an April 14, 2013 e-mail from Craig Kittleson to Sam Landes

-additionally there are two other north/south primary snowmobile corridors that serve the same stated purpose (to allow snowmobile to get from the Military Ridge State Trail to Black Earth) as this proposed trail. They are Corridor 23, 7 miles west of BMSP, and corridor 21, 6 miles east of BMSP

**Safety concerns:**

I personally met with Iowa County Highway Commissioner Craig Hardy at the proposed relocated ski/hike/bike/snowshoe trail crossing of Mounds Park Rd on January 13, 2016. This trail crossing relocation is needed to accommodate the proposed snowmobile trail. Despite DNR staff claims that this new crossing will provide "...an improved sightline location..." (P.3 of Draft January 2016 Master Plan Amendment), Commissioner Hardy confirmed that the new proposed trail crossing DOES NOT meet minimum DOT specifications for a pedestrian crossing on a 35 mph roadway. The existing crossing DOES meet the sightline specifications.

-Snowmobiles will be allowed to operate on the proposed snowmobile trail, in close proximity to the ski trail, and crossing the ski trail in two locations with no daytime speed limit, and a night time speed limit of 55 mph. This in an area where the vehicular roadway speed limit is only 35 mph.

### **Operating hours:**

-while the State Park is closed to all other users between the hours of 11 pm and 6 am, DNR staff have stated that snowmobiles will be allowed to operate on the proposed trail 24 hours a day.

### **Environmental Costs:**

- Construction of the proposed snowmobile trail will necessitate the cutting and bulldozing down trees for almost its entire length. The eastern half of the route will require cutting of large numbers of younger hardwoods, tomorrow's forest. The north and western half of the trail will include the destruction of stately burr oak trees, progressing through a magnificent stand of conifers (which provides winter nesting habitat and protection to numerous bird species and other animals), and ending its path plowing through a hardwood forest, classified by the DNR as part of the "Pleasure Valley Woods Primary Site". The DNR states in Appendix E of their Rapid Ecological Assessment that "These "Primary Sites" were delineated because they generally encompass the best examples of 1) rare and representative natural communities, 2) documented occurrences of rare species populations, and/or 3) opportunities for ecological restoration or connections. These sites warrant high protection and/or restoration during the development of the property master plan".
- Construction of the proposed snowmobile trail will require at least three

crossings of watercourses that are direct tributaries to the environmentally sensitive Ryan Creek.

- Re-routing the existing ski trail to accommodate the proposed snowmobile trail will also result in needless disturbance of the earth, animals, trees and other plants
- Construction of the new snowmobile trail will result in opening of the forest canopy in the Pleasure Valley Woods Primary site, creating a break in this core of currently un-fragmented interior forest landscape
- The new snowmobile trail, as well as the multi-use trail alignment and re-siting of sections of the current Pleasure Valley Ski Trail will all result in new avenues for the spread of invasive species
- **Noise Issues:**
- DNR listening sessions and earlier written comments, as well as much scientific literature, indicate that “quiet” is a very important part of the recreational experience of non-motorized park users.
- P.11 of Draft January 2016 Master Plan Amendment states “...protection of acoustical environments has received growing attention....as a result of an increased understanding of its role in overall ecosystem health and visitor enjoyment.”
- Unfortunately, the DNR reaches the incorrect conclusion that the sound of a car travelling at 35 mph along Mounds Park Road, buffered from the ski trail by both trees and distance, will have the same acoustical impact as a snowmobile traveling at a much higher rate of speed, with little remaining vegetative buffer, at half or less the distance (inverse square law means the sound level quadruples as you half the distance) from the ski trail.
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- **Social Costs:**
- Currently there exists a culture of Silent Sports enthusiasts and like-minded individuals who support the park, the Friends of Blue Mound State Park, and the DNR in their respective missions, both monetarily and through their donation of tremendous amounts of volunteer hours. The construction of this proposed snowmobile trail will jeopardize those positive relations that have been formed over the last several decades.
- **Economic Costs:**
- Construction of the proposed snowmobile trail and the concurrent relocation of the current Pleasure Valley Trail and Planned Multi-Use Trail Alignment will come at an extremely high monetary cost to taxpayers. Meeting the statutory definition of a snowmobile TRAIL, the Snowmobile Trail will be eligible for state tax payer dollars, contrary to the statement made on p.5 of the Draft January 2016 Proposed Master Plan Amendment. This fact was

confirmed in a January 19<sup>th</sup>, 2016 e-mail correspondence to me from State Parks Director Ben Bergey.

- My 30 years working at Blue Mound State Park gives me an intimate knowledge of the difficulties involved in trail building at the park. The areas in question feature extremely poor drainage, heavy clay soils, perched water tables, springs, massive boulders, and steep terrain. Several bridges will need to be constructed for the snowmobile portion of the route. The relatively level areas of the proposed routes all feature poor drainage due to the fore mentioned reasons, and will require fill, extensive ditching, and numerous culverts. The USDA Soil Survey of the areas in question describes the “Degree and kinds of limitations of the soils for town and country planning” as follows; “Severe: water ponds in pits; difficult to work during wet periods; bedrock at a depth of 2 to 4 feet; springs and seeps in places; highly plastic; subsoil has low bearing capacity; unstable when wet; highly susceptible to frost heaving.” Trail construction in these conditions is very difficult and expensive.
- Reducing the quality of the skiing/ winter hiking/winter biking/snowshoe experience at Blue Mound, due to the construction of the snowmobile trail will result in a direct loss of trail pass and park sticker fees to the Parks Program as silent sport enthusiasts chose to frequent other “silent” venues, instead of Blue Mound State Park.
- Current Silent Sport Park users are already expressing their reluctance to donate money and volunteer time to the park and the Friends Group if this proposal goes through.
- **Poor allocation of resources:**
- The future of the proposed snowmobile trail once it exits Blue Mound State Park is extremely tenuous. It makes no sense to go through all of this expense and environmental destruction when next year the route may be a dead end due to the sale of a piece of property, or the decision of a current landowner to curtail his/her allowing the snowmobile route through their property.
- I attended the Iowa County Transportation Committee meeting on January 4, 2016 where the Committee recommended approval of a TRIAL, almost 2 mile segment of snowmobile ROUTE along Iowa County Highway K. This 2 mile segment is a necessary segment of the proposed trail in Blue Mound State Park, being about 2-3 miles “downstream” from the park. The Iowa Co. Hwy K Route will be designated a snowmobile route only through April 15, 2016! It requires annual reapplication and county review for each and any subsequent year. Additionally, the resolution states “Iowa County reserves the right to close the snowmobile route at any time, with notice to be given to Craig Kittleson at 608-575-7577, as representative for the club.”

- It should also be noted that Craig Kittleson was in attendance at this meeting, and when asked if he considered the Highway K Route safe, he stated “Yes”. The Highway K route is on and alongside a heavily travelled county highway with much semi-tractor-trailer traffic, and a 55 mph speed limit. There are portions of the Route where snowmobiles will be travelling less than eight feet from the edge of the pavement, due to steep hillsides. It seems ill advised for the DNR and taxpayers to be funding the construction of an extremely invasive, extremely expensive 1.2 mile section of snowmobile TRAIL through Blue Mound State Park when Mounds Park Road has but a tiny fraction of the traffic of Highway K, has a 35 mile per hour speed limit, and has virtually no heavy truck traffic.
- In Southern Wisconsin the snowmobiling season is extremely short, seldom more than a few weeks total per season. In contrast the cross country ski season at Blue Mound is generally about 3 months, the longest cross country skiing venue in the southern part of the state.
- Limited snowmobile funds could be much better used on a more necessary trail elsewhere.

**Summary:** The proposed snowmobile trail and planned multi-use trail alignment are not needed. Their construction would reduce visitor safety, reduce current park users’ park experience, and reduce the amount of revenue brought in to the State Park system. The construction would cause great environmental destruction, come with a HUGE monetary price tag, and cause irreparable harm to the current goodwill the DNR, the Friends of Blue Mound State Park, and the public share, demonstrated by the incredible amount of volunteer hours donated and hundreds of thousands of dollars raised by the Friends through this wonderful synergy. Let’s not damage it or the park by a short-sighted decision. **PLEASE DO NOT APPROVE THE CONSTRUCTION OF A SNOWMOBILE TRAIL AND THE CONCURRENT PLANNED MULTI-USE TRAIL ALIGNMENT.**

Thank you,

Karl Heil, Barneveld, WI

Retired Blue Mound State Park Employee, 1981 – 2011 (Ranger- Park Superintendent)

Current Friends of Blue Mound State Park Advisory Board Member

Co-founder Horribly Hilly Hundreds Bicycle Challenge Ride

**Kenneth Wade Comments – BMSP Master Plan**

To: The Natural Resources Board

c/o Natural Resource Board Liaison: Laurie Ross: [Laurie.Ross@wisconsin.gov](mailto:Laurie.Ross@wisconsin.gov)

From: Kenneth Wade, P.E., P.G., 10747 Moyer Rd., Blue Mounds, WI, 53517, 608-767-3111, [kenneth.wade@tds.net](mailto:kenneth.wade@tds.net)

Re: Natural Resources Board Action on the Proposed Blue Mound Park Plan Amendment

**The Blue Mounds State Park (BMSP) Master Plan should not be amended to provide for a north/south snowmobile connection to a regional snowmobile trail system, either as proposed by WDNR, or as currently allowed by WDNR along public roads contained within the park in consideration of the following:**

1. In general, additional motorized recreational activity at BMSP is incompatible with the overwhelming dominant winter use of the park as a "silent sport" premier location in southern Wisconsin.
2. The routing of snowmobile traffic through and adjacent silent sport trail locations currently used by skiers, snowshoers, hikers and bikers will have a significant adverse impact on these users. Though there is some background roadway noise at BMSP, the conclusions of the WDNR acoustic study are incorrect because it overemphasized the similarity of these impacts by comparison to snowmobile noise at the limited locations where the roadway is immediately adjacent a ski trail e.g. noise monitoring point K. The study did not properly evaluate the 3200 foot distance in which the proposed snowmobile trail is adjacent to the Pleasure Valley ski, snowshoe, hike and bike trail systems. This will significantly increase the noise exposure to the silent sport users. The expected occurrence of snowmobile group riding will significantly increase both the total noise level and its duration. The night time snowmobile use of the connector will add to magnitude of these impacts. The WDNR must acknowledge that the connection of a regional snowmobile trail system through the park will significantly increase the total quantity, duration and proximity of motorized traffic and resultant impacts in the silent sport areas. The relative

impact of additional noise on the quality of the silent sport users was not adequately considered by the WDNR therefore the WDNR analysis failed to adequately evaluate the **cumulative impacts** of the added snowmobile noise. In addition, evaluation of noise impact from snowmobiles in sensitive outdoor areas has shown that the A-weighted average sound level measurements, as were used by the WDNR in its noise study, are not sufficient to describe the noise from snow machines where audibility at longer distances and where the low frequency tonal peaks are of concern (Reference: "Noise Data from Snowmobile Pass-bys: the Significance of Frequency Content", Christopher Menge, Jason Ross and Richard Ernwein (National Park service), 2002-01-2765, Society of Automotive Engineers). The authors conclude that "the audibility of snowmobile activity (including the low frequency tonal peaks) must be evaluated in the context of the natural soundscape where the most affected visitor experiences include those that involve solitude, tranquility, and contemplation of nature and natural processes."

3. In addition, the WDNR did not attempt to value or weight the affective impact of the snowmobile exposure on the extremely sensitive silent sport park users who would be disproportionately impacted by the noise, odor and speeds associated with snowmobile use in an area where there is a desire and expectation of a quiet, unpolluted natural surroundings. The impact on the affective values of silent sport participants by snowmobile use has been well documented in the scientific literature (see Vitterso et.al. 2010, "Recreational Conflict Is Affective: The Case of Cross-County Skiers and Snowmobiles, Leisure Sciences, 26:3, 227-243).
4. The proposed BMSP Plan Amendment eliminates several miles of the Overload trail system, citing significant impacts to the Pleasure Valley Woods Primary Site area due to the trail serving as a potential "internal edge" that could affect the abundance and distribution of bird species along the trail corridor. The Overload trail width of less than 18 inches and lack of any disturbance of the tree canopy invalidates this conclusion. However, the proposed snowmobile trail extension, utilizing a 12- foot width of trail construction through the Pleasure Valley Woods Primary Site and establishing and facilitating additional similar disturbance through many miles of adjacent woodlands of similar ecological sensitivity, will result in significant adverse impacts that should preclude the WDNR's approval of the snowmobile trail. In addition, to the significant "internal edge" impact, the trail clearing and maintenance activities will result in significant additional vectors for invasive plant species in the park. Likewise, the snowmobile trail will be crossing numerous watercourses, all draining into Ryan Creek, the same "sensitive waterway" that the Department deems needing protection from the Overload Trail.

5. The proposed rerouting of the Pleasure Valley Trail crossing on Mounds Park Rd (to accommodate the proposed snowmobile trail) will result in the creation of a pedestrian/bike/ski crossing that is very unsafe and does not meet WI DOT minimum safe sight line requirements for a pedestrian road crossing.
6. The construction of a snowmobile trail within BMSP is an unnecessary expenditure of scarce DNR/Taxpayer dollars. These resources could be better used in park management activities such as invasive species control, as cited in the WDNR plan ecological assessment, or in the protection, through easement or acquisition of the sensitive ecological areas adjacent to the park.
7. The unusually active silent sport user base for BMSP has provided a very high level of support and engagement through user fees, donations and volunteer labor. The WDNR proposal of increased snowmobile use and abandonment of user-constructed trails would alienate these users to a significant detriment of the WDNR goals for the park.
  - a. The Friends of Blue Mound State Park (FBMSP) has contributed in excess of \$714,000.00 to BMSP during the period of 2008-2015 alone, along with countless volunteer hours.
  - b. The above proposal runs counter to the Silent Sport user base that provides FBMSP and BMSP with volunteer and financial support.
  - c. The main funding for FBMSP projects comes from two major Silent Sports Events; the Horribly Hilly Hundreds Bicycle Challenge Ride, and the Blue Mound Trail Run
  - d. Some Major Financial and Volunteer supporters of the FMSP have expressed their reluctance to continue to support the park and the Friends if the above proposals are approved
  - e. Feelings of betrayal from the DNR by the Silent Sports users will make it harder for FBMSP to obtain new volunteers and financial supporters
8. The rerouting of the Pleasure Valley Trail will result in moving the ski trail into a less desirable location (more wind and sun exposure, steep side slope)
9. The viability of the northern extension of the regional snowmobile club trail for which the Park is promising to accommodate has not been established. The proposed club trail has been unusable for many decades due to lack of private landowner willingness to participate. The WDNR has been asked to provide documentation of the viability of the proposed trail route, including signed access agreements, but the WDNR has not been able to provide this. Until this documentation is provided the WDNR should not commit irretrievable resources and cause unacceptable impacts to approve this plan and construct the trail. Department spokespeople have stated that if the proposed snowmobile trail becomes a “dead end” because of withdrawn private

landowner access in the future, the trail will be closed. The future viability of the snowmobile trail through the park is already in question, as their route approval along Iowa County Highway K, a few miles north of the park, is on a year by year trial basis, starting with this year. Unfortunately, if the trail is found to be infeasible all of the above noted costs and environmental impacts will have already occurred.

### **Friends of Blue Mound State Park – Comments on Proposed BMSP Plan**

**From:** [Mark Gnabasik](#)

**Sent:** Thursday, January 21, 2016 2:21 PM

**To:** [Laurie.Ross@wisconsin.gov](mailto:Laurie.Ross@wisconsin.gov)

**Subject:** Comments on NRB Agenda Item 3.B.5 for 27 January Meeting

1. **Name:** Mark Gnabasik, President of FBMSP, submitting on behalf of FBMSP Board Members
2. **Name of Organization:** Friends of Blue Mound State Park (FBMSP)
3. **Agenda Item No.:** 3.B.5 (see below) – We OPPOSE the Snowmobile Route through Park, but SUPPORT Trail Additions/Improvements
3. Action Items,
  - B. Land Management, Recreation, Fisheries, and Wildlife
  5. Request Approval of the Blue Mound state Park Master Plan Amendment
4. **City of Residence:** Blue Mounds, WI
5. **Phone Number:** 608-437-7372
6. **E-Mail:** [mgnabasi@epic.com](mailto:mgnabasi@epic.com)

## **Written Comments:**

In response to the January 2016 Draft of the Blue Mound State Park Master Plan Amendment, the Friends of Blue Mound State Park (FBMSP) would like to formally and strongly oppose construction of the proposed 1.4-mile snowmobile route through the park. We are, however, in support of many of the trail additions/improvements proposed in the plan for silent sports.

We think it is important to point out that the FBMSP have contributed in excess of \$714,000 to Blue Mound State Park (BMSP) during the period of 2008-2015, along with countless volunteer hours. It is the silent sport user base that provides all of the volunteer and financial support for the Park, with the main funding for FBMSP projects coming from two major silent sport events each year—the Horribly Hilly Hundreds Bicycle Challenge Ride and the Blue Mound Trail Run, which couldn't be achieved without the numerous volunteers as well. In addition, all of the financial donors for the FBMSP shelter were silent sport advocates, and the shelter was recognized by DNR officials at the June 2013 ribbon-cutting ceremony as one of only a few four-season shelters in the State and a testament to the dedicated volunteers and silent sport users of BMSP.

Our arguments for the opposition of the snowmobile route through the park are listed below:

1. The proposed snowmobile route runs contrary to the silent sport user base that has provided all of our volunteer and financial support through the years, and many of these supporters have expressed their reluctance to continue to support the Park and the Friends if this snowmobile route is approved. This loss of goodwill by the DNR to the FBMSP and our supporters is of great concern to us and may hinder our ability to obtain new volunteers and financial supporters in the future. With DNR funding towards the State parks dwindling, it is crucial that our fundraising efforts can continue at their current high levels.
2. A snowmobile route through BMSP is not needed. There is adequate north-south routing on existing snowmobile trails located both east and west of the Park (Corridor 21 and Corridor 23). The construction of a snowmobile trail within BMSP is an unnecessary expenditure of scarce DNR/taxpayer dollars when a viable, approved

snowmobile route through the Park already exists along Mounds Park Road, and the snowmobiles have operated there for the past several years with the approval of both the DNR and the local townships. The proposed snowmobile route will cause considerable environmental disturbance to the area by the cutting of trees and bulldozing a 12 foot or wider swath through the forest, and it does not take into account the need for two major bridges at stream crossings, tributary to the sensitive Ryan Creek. The WI DNR website notes that there are 25,000 miles of groomed snowmobile trails in Wisconsin, but fewer than 700 miles of groomed cross-country ski trails (with less than 10 miles of groomed ski trails at BMSP). With an existing snowmobile route already available along Mounds Park Road, the needs of both silent sport and snowmobile users within BMSP are already being met.

3. The cost of the snowmobile trail includes the cost to reroute sections of the Pleasure Valley Ski/Hike/Bike Trail at considerable expense and environmental impact. The rerouting of the Pleasure Valley Trail will result in moving the ski trail into a less desirable location where there is more wind and sun exposure, as well as a steep side slope. The cross country ski season in southern Wisconsin is significantly longer (generally several months) than the snowmobile season (several weeks in a good snow year), and we are disappointed with this change and the impact it will have on our users. And unlike snowmobiles, cross country skiers, mountain bikers, hikers, runners, and snowshoers make a direct financial contribution to BMSP due to their purchases of park stickers and trail passes.

4. The construction of the proposed snowmobile trail will put it significantly closer to the current Pleasure Valley ski trail than the current route along the road, significantly diminishing the skiing experience by the increased noise and fumes from the snowmobiles. While less of an impact than running the snowmobile route directly through Pleasure Valley as originally proposed, in its new proposed location, it will still have an unacceptable noise impact with snowmobiles being able to travel at higher speeds than automobiles (35 mile per hour auto speed limit on Mounds Park Road), and at half the distance from the ski trail than if they were along the roadway. We believe the sound levels will be much greater than the levels monitored by the DNR with their audio monitoring of automobile traffic on Mounds Park Road. Quiet areas are an extremely rare commodity in southern Wisconsin parks.

5. As confirmed by several DNR staff, there will be no set speed limit on the proposed snowmobile route through the park, and an allowable nighttime speed of up to 55 mph will greatly affect the safety of other park users. Another safety concern of the FBMSPP is the proposed relocation of the Mounds Park Road trail crossing (to accommodate the proposed snowmobile trail), which will result in the creation of a pedestrian / bike / ski crossing that is unsafe and does not meet WI DOT minimum

safe sight line requirements for a pedestrian road crossing, as reviewed on-site with Iowa County Highway Commissioner Craig Hardy on 1/13/16.

6. In several meetings with DNR staff, they indicated a land-use agreement would be executed annually between the DNR and the snowmobile clubs so the route and its impact can be reviewed each year, but there are no assurances of this, and it is not covered in the proposed Amendment. In addition, the DNR is relying on the snowmobile clubs to prove landowner permissions instead of conducting their own verifications. The fact that the snowmobile route through BMSP could be closed in the future, as stated by DNR spokespeople, if 1) it becomes a “dead end” because of withdrawn private landowner access, or 2) dangerous behavior occurs on the part of the snowmobilers, is troubling because unfortunately all of the construction costs and the environmental impact will have already occurred. It is also our understanding that the snowmobile route approval along Iowa County Highway K, a few miles north of the park, is being allowed on a trial basis only, starting this year. It seems like a bad business decision to approve of a snowmobile route that is contingent upon staying open by a probationary trail upstream. This puts the future viability of the snowmobile trail through the park already in question, while the DNR plans to move forward with construction of the trail on State property. FBMSF members were also told by DNR staff that maintenance of this snowmobile route would be done by the snowmobile clubs, including coming back in the summer to repair any damage done to the trail during the winter. Again, this is not indicated in the proposed Master Plan Amendment, so there is no ‘guarantee’ that this will occur. And with the possible need for construction of two bridges on this route, we are concerned that this will not be included in their annual maintenance, and we all have seen the damage snowmobiles do to wood bridges on our trails.

7. Lastly, the proposed snowmobile trail will cut through a section of the Pleasure Valley Woods, north of Ryan Rd, an area designated by the DNR as a “Primary Site”, warranting high protection, yet the Amendment proposes bulldozing a 12’ wide snowmobile trail through this Primary Site. The rapid ecological assessment (p. E-2) makes reference to the Pleasure Valley Forest extending north and east (from the park), “... and within 1.5 miles there is at least an additional 1200 acres of connected forest. Included in that extended area are additional public (Dane County Parks to the east) and private lands with conservation easements.” The construction of a snowmobile trail will be disrupting this northern section of the Pleasure Valley Woods Primary Site. Likewise, the snowmobile trail will be crossing numerous watercourses, all draining into Ryan Creek, the same “sensitive waterway” that the Department deems needing protection.

Other comments about the proposed Master Plan Amendment are as follows:

1. The FBMSP supports the changes to the Overlode Trail as proposed in the revised Draft Amendment. The realignments to Over Lode were requested by Jeff Prey to reduce the impact of the trail on wildlife, to make the trail more sustainable, and to reduce the difficulty for riders, which were all addressed by a proposal submitted to the DNR on 12/16/15 from Walt Hougas of the CORP group (Capital Off Road Pathfinders). CORP members are very active in BMSP, and Walt Hougas is also a FBMSP board member. The issue of closing this trail was withdrawn by the DNR as a result of CORP's proposal, and the revised Draft Amendment preserves the Overlode as a trail loop. The FBMSP recently committed to provide funding for the Overlode Trail realignments/improvements at an estimated cost of over \$11,000.
2. FBMSP also supports the improvements to the existing trails and the addition/completion of new trails such as the Pokerville Trail. We do, however, feel that the proposed repairs to existing trails be prioritized ahead of construction of new trails as written into the Draft Amendment Page 4.
3. The Blue Mound Nordic Ski Club holds a youth and family ski on five (5) Saturdays in January and February, which have become very popular with families with young children. The Friends Shelter and a team of dedicated volunteers from Blue Mound Nordic have been a key to its success. The ski club provides instruction and equipment for youth skiers at these events. One of the biggest challenges for beginners is of course the hilly terrain on many of the trails. Therefore, the FBMSP supports the development of beginner ski (and bike) loops to provide family-friendly trails suitable for beginners of these sports. BMSP greatly needs these family-friendly and adaptive trails to open the Park to an even larger group of silent sport users. These beginner loops would also be utilized at the two (2) annual FBMSP Candlelight Ski & Hike events held in January and February. We also support more skate skiing opportunities by creating new loops from the campground.
4. The FBMSP request the addition of language that includes development of winter trail connections for snowshoers and fat bikes to get from one trail to another separate from the groomed ski trails. A group met with a DNR staff member in July 2015 to review the locations for these needed connections, so we were greatly disappointed to not see them included in the Amendment. While the argument has been made that snowshoers can 'go anywhere' on their snowshoes, the reality is that many areas of BMSP have dense foliage and significant underbrush, and it is quite difficult to get through. This argument, however, does not suffice for the fat bikes who need designated trail connections to get to their existing trails.

We are proud of our beautiful state and the many outdoor activities it has to offer, and there is room for everyone to enjoy their favorite winter activity. The Park's trails are used by numerous different silent sport users who can remain active all year round in BMSP, as long as we can continue to provide a safe and tranquil experience for them. We are simply asking to preserve the unique experience made available to us at BMSP. The Friends of Blue Mound State Park request that the NRB reject the new proposed snowmobile route through the park, which brings along with it unnecessary expenditures, detrimental environmental impacts, and safety concerns, but approve of the proposed silent sport trail improvements/additions. Thank you for your careful and objective consideration of the proposed Amendment.

Respectfully submitted,

Mark Gnabasik

President

Friends of Blue Mound State Park