

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

Date Submitted	Submitter	Email Address	COMMENTS
01.07.2021	Bob Balhiser	patty-bob@msn.com	No to E-bikes. Period. Full Stop. Bob Balhiser Helena
01.12.2021	Polly Pfister	ppfister@mt.net	<p>To Helena Parks Department:</p> <p>I strongly oppose allowing any e-bikes on any trails on Helena’s Open Lands, for the following reasons:</p> <p><u>Extreme danger to public safety:</u> I hike on Mt. Helena regularly and frequently, and have for many years. Based on experience, I am absolutely certain that e-bikes on our trails would be terribly dangerous, and even life-threatening, for everyone else who is hiking or walking on the trails.</p> <p>E-bikes on our trails are a colossal danger to all foot traffic, including hikers, dog walkers, birdwatchers, simply because they go too fast (20 mph is minimal speed) to be able to stop or avoid hitting unsuspecting hikers and walkers, whether going downhill or uphill.</p> <p>Even though current rules state that bikes are required to yield to hikers, a large majority of bikers already refuse to stop or even slow down for hikers on our trails, especially when they are riding downhill (often out of control). These bikers on e-bikes, whether going downhill or uphill, would be a nightmare in fast motion, poised to run over anyone else on the trail, far more dangerous than the aggressive pedal-bikers we must now deal with on almost every hike we take.</p> <p>The City’s trail system has countless blind corners, where fast moving bikers already endanger us hikers, especially riding downhill. They cannot see us below them on the trail, and ride too fast to stop when they round blind corners, coming dangerously close to hitting us hikers. Our only option at that critical moment is to jump off the trail, if we can, to avoid being injured or killed by these errant, out-of-control bikers. Too often, there is nowhere to get off the trail when an out-of-control biker bears down on us, often because of steepness of the hillside. E-bikes will greatly exacerbate this already dangerous situation.</p> <p>The most recent fast-moving biker who ran me off the trail, laughed uproariously as he sped by, riding rapidly downhill. That guy, well into his 40s, epitomizes the dangerous, aggressive, irresponsible attitude of</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>far too many bikers on our open space right now. The City should absolutely not add e-bikes to these already dangerous encounters.</p> <p><u>City has liability for serious injury or death caused by e-bikes:</u> E-bikes going 20+ mph on our trails and causing injury or death of hikers is totally foreseeable, and highly likely to happen, if e-bikes are allowed on our Open Lands.</p> <p>Allowing e-bikes on our Open Lands exposes the City of Helena to serious liability and the considerable likelihood of expensive lawsuits for any injuries or deaths caused by e-bikes. The City would lose any such lawsuits, and be required to pay huge medical expenses, rehabilitation expenses, life care expenses, damages for extreme pain and suffering, severe emotional distress, etc., that could amount to millions of dollars per claim. This risk is simply not worth it. Keep dangerous e-bikes off our trails.</p> <p><u>E-bikes have countless other places to ride besides our Open Lands:</u> There is no shortage of trails for e-bikes outside of Helena, and they can ride elsewhere, instead of on our Open Lands.</p> <p><u>BLM and Forest Service lands are different from Helena Open Lands:</u> Helena’s Open Lands are urban parks, far more heavily used than rural BLM or FS lands. That fact alone necessitates stronger public safety measures for hikers than these federal agencies have in place. The City needs to protect, not further endanger, the hiking public. Prohibiting e-bikes is a necessary public safety measure the City must implement.</p> <p><u>Motor vehicles are prohibited on Open Lands:</u> E-bikes are motorized vehicles. Motor vehicles are prohibited on the city’s Open Lands. Therefore, e-bikes, being motor vehicles, must be prohibited on our Open Lands. Period.</p> <p>Thank you so very much for considering my comments.</p> <p>Polly Pfister</p>
01.15.2021	Bruce Newell	bruce.newell@gmail.com	<p>My name is Bruce Newell. I live with my wife Sue on the west side of Helena. I am 69 years old. In my younger days I regularly ran on and mountain-biked the Helena South Hills trail system. Now I am a daily and an passionate walker. I served for several years on Helena’s Non-Motorized Travel Advisory Council.</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>I ride a pedal-only bicycle, I have not yet graduated to an e-bike, but given my love of cycling and my 'gracefully' aging body, it's only a matter of time before I too start riding an e-bike.</p> <p>I am fortunate to have extensively toured North America and Europe on bicycles. It was in Europe that we first saw e-bikes, they were everywhere. I have read estimates that a third of all the bicycles sold in the European Union are e-bikes. This seems about right from what we saw. By in large the e-bike riders rode with the same courtesy and competence as did the non-bike riders (which is very courteous and competent indeed).</p> <p>As you know, there are three classifications of e-bikes: Class 1 — Pedal e-assist with a maximum assisted speed of 20 mph Class 2 — Throttle e-bike that maxes out at 20 mph Class 3 — Pedal e-assist with a maximum assisted speed of 28 mph</p> <p>And then there are larger e-bikes with throttles permitting higher speeds that are essentially motor scooters or motor bikes. These are often prohibited on bicycle trails in the EU, whereas the e-assist bikes are welcomed — they are just a normal part of peoples' transportation life.</p> <p>My wife rides a Class 3 Trek, designed for shopping, light touring, and fun. And it is a fun bike to ride. It is a pedal bike with what to me feels like a dial-a-tail-wind feature. The bike doesn't go without pedaling, and depending upon the bike's setting, the motor rewards your pedaling a mild to significant boost. It feels wonderful, and I have never seen someone try an e-bike without grinning. E-bikes are like pedal-only bikes, but with a magic assist.</p> <p>I urge policy makers to try an e-bike out before setting e-bike policy. They are fun, and are no more a threat to other walkers, runners, other cyclists, and horse-back riders than a non-powered bike.</p> <p>Instead of prohibiting e-bikes, what should be formally discouraged or regulated are trail-users behaving in ways that threaten other trail users, or degrade the land upon which our beloved trails traverse.</p> <p>What should be discouraged or prohibited are:</p> <ul style="list-style-type: none">• Cutting switchbacks or corners• Running people off the trail• Impeding others' travel
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E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<ul style="list-style-type: none"> • Traveling at high speed or otherwise endangering other trail users (including dogs and horses) • Lack of courtesy, regardless of how it's manifested <p>These are neighborhood trails and while using them we must act like good neighbors. An unpowered mountain bike can be just as discourteous as a mountain bike with e-assist. The e-assist nature of the bike does not by itself lead to increased courtesy or discourtesy, it's on the rider. As trails continue to get more crowded, we must actively promote courtesy and consideration in all trail users.</p> <p>Electronic assist bicycles are here to stay. Most likely e-bikes will increase in number with the aging of my generation of bicycle riders, and improvements in battery life.</p> <p>I urge the City to work at actively educating and patrolling our trails, encouraging a culture (the shared expectation) of consideration, courtesy, and neighborly respect among trail users. It isn't e-bikes that are the problem. As Walk Kelly wrote in his Pogo comic strip, "We have met the enemy, and he is us." Singling out e-bikes misidentifies the problem and doesn't suggest useful remedies.</p> <p>I think that Class 2 bicycles should be prohibited from most or perhaps all Helena trails. I don't see the difference between Class 2 e-bikes and a Vespa motor scooter.</p> <p>I agree with current Forest Service regulations that bicycles of all sorts should be prohibited in wilderness areas; but of course, we're not talking about wilderness areas when talking about Helena's trails.</p> <p>I recommend that Class 1 and Class 3 e-assist bicycles be allowed on Helena's trails, but that an educational campaign and enforcement strategies be employed to build a culture of courteous trail use.</p> <p>Bruce Newell; 2570 Mayrowan Court; Helena, Montana 59601; (406) 461-3206</p>
01.19.2021	William Cook	reho1951@yahoo.com	<p>Hello, I have been looking for a way to submit a comment concerning e-bikes on the South Hills trails network. Since I couldn't find anything, I thought I'd direct my comment to you. Would you please forward my comment to the appropriate people? And would you also please send me back an email confirming that? Many thanks.</p> <p>My wife and I hike the South Hills trails very frequently. Personally, I hike the South Hills trails around 200 times per year. That trail network is one of the main reasons we live in Helena.</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>We are strongly opposed to the use of e-bikes on South Hills trails.</p> <p>Anything that increases the speed of mountain bikes even a little bit (either uphill or downhill) will have a negative effect on hikers. Right now, there is a truce between mountain bikers and hikers in the South Hills. One of the things that maintains that truce is the fact that mountain bikers have to slow way, way down when ascending a slope. If you allow e-bikes, that truce will be shattered, as e-bikes will allow riders to ascend slopes much, much faster. Increased speed by bikes will inevitably lead to collisions with hikers, and people will get hurt.</p> <p>I recently saw a letter in the IR which proposed allowing Class I and III e-bikes on the South Hills trails, but not Class II e-bikes. That would be totally unenforceable. Once you legalize any class of e-bike on our trails, the practical effect will be to allow the other classes of e-bikes as well. The word will be out that "e-bikes are allowed in the South Hills," and the only way to enforce the distinction among bike classes would be to have law enforcement officers out on the trails, checking e-bikes and issuing citations. And we all know that won't happen.</p> <p>Allowing e-bikes would be the proverbial "camel's nose under the tent." Make no mistake: if e-bikes are allowed on the South Hills trails, there will be more requests to allow even more types of motorized transport on our trails.</p> <p>I am not persuaded by those who say that allowing e-bikes is necessary to accommodate those who can no longer pedal a human-powered bike. My wife and I are both in our mid-sixties. And my wife has medical problems that make it more difficult to walk and hike. We have no interest in riding e-bikes on the South Hills trails. As we get older, the last thing we want to encounter on a narrow trail is a bike moving faster than a typical human-powered bike.</p> <p>If e-bikes of any class are legalized on South Hills trails, there will be open conflict between e-bikers and some hikers. Thanks for listening, and best regards.</p> <p>Bill Cook; 1129 9th Ave.; Helena</p>
01.19.2021	Chris Deveny	cmdeveny7@gmail.com	Dear Ms Ponzozzo -

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>I'm an avid (daily) user and supporter of our city's open lands. I want to let you know of my position regarding the use of E-bikes. It is the following:</p> <p>E-bikes have motors and should, therefore, be considered motorized vehicles and should not be allowed on non-motorized trail systems including our open space lands. Nor should we change our trail designations (or the definition of "motorized") to accommodate them. It seems pretty straight forward to me. I think e-bikes do have a place as commuter and recreational vehicles on our streets and roads.</p> <p>Thanks for all your work and Happy New Year!</p> <p>Ms. Chris Deveny</p>
01.19.2021	Mark Meloy	mkmeloy@gmail.com	<p>Dear Mayor, Commission and Parks Director, As an older person myself I understand the need and attraction of e-bikes. They may be perfect on city streets and roads but are totally inappropriate for use on most of our forest trails, where they pose unacceptable risks to hikers and to themselves. Also, I believe that they would further compound the impacts that cyclists have already caused to area trails. Once this cat gets out of the bag there is no stopping it. It is going to be very difficult to draw any kind of a line between motorcycles and e-bikes. I feel that the two forms of motorized transportation should be governed by the same restrictions.</p> <p>Thanks for this opportunity to comment.</p> <p>Yours, Mark Meloy; 920 State Street; Helena, Montana 59601; 435-419-0116</p>
01.20.2021	Dennis McCahon	galumphant22@gmail.com	<p>Dear Mayor and Commissioners;</p> <p>I hope, and trust, that you'll put a lot of analysis into the question of whether or not to allow e-bikes onto Helena's public open-lands system. There's much to consider.</p> <p>There's the matter of carrying capacity, for one. This depends on how much traffic the trails are carrying now, how much more they're capable of carrying, the nature of various sorts of traffic as it relates to that carrying potential etc.</p> <p>As a frequent hiker, I know that the open-lands trails are heavily used by pedestrians, mostly because many trailheads are within an easy walk of thousands of households. The open-lands function as a walkable extension of our walkable town. They're a pedestrian amenity, like the sidewalk system. That sort of urban-wildland inter-connectivity is very rare nowadays -- and it's obvious that many of us appreciate it.</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>So many, in fact, that some of those trails are at their pedestrian carrying capacity (as shown by their ongoing erosion, etc.). So, given the reasonable observation that walking is the least-erosive and least-disruptive way to use a trail, it would seem that the trails can best serve the greatest number if they're limited to non-motorized (pedestrian) traffic -- like the sidewalk system.</p> <p>I'm aware that some will argue that e-bikes aren't really motorized; which, frankly, doesn't make sense (manufacturers, for example, freely discuss their "motors"). E-bikes are already designed for speeds of up to 20 mph. and they continue to be "improved", getting more efficient, more powerful, faster, better at hill-climbing etc -- a more-and-more potentially dominant presence on the trails.</p> <p>I'm also aware of the argument that e-bikes are needed to allow us to continue enjoying the trails as we age and as our "knees give out" etc. At age 73, I'm probably in that ageing category, but I surely don't expect to be given a motorized advantage over my younger fellow hikers -- thereby negatively effecting their experience of the trail. I'm reminded of an argument I heard once, that "roads should be built in the Bob Marshall Wilderness so that less-able folks can enjoy it". Even given that a few less-able folks would use e-bikes, it seems reasonable to expect that for every such less-able e-biker, there'd be a dozen more perfectly able ones who simply prefer their recreation motorized. "Why walk when an e-bike lets you go faster with less effort?"</p> <p>I'll shut up for now, but I'll probably have more to say as the e-bike discussion continues. I just happen to love our public open-lands. It's a "sense of place" issue. Is trail-use all about the place, or about the hardware?</p>
01.21.2021	Ann Ripley	aripley50@gmail.com	<p>My name is Ann Ripley and I hike in the South Hills. I am quite concerned about the possible use of E-bikes on our trail systems in the South Hills as well as the trails in the Scratch Gravels. By definition, they are motorized, allowing the person riding them to go faster and easier which makes them a hazard for hikers. The smooth talk being expressed is that e-bikers will have to be courteous. This is pie in the sky dreaming as there are several regular bikers who are not courteous. You are expecting me to believe that just because they are on an e-bike they will be courteous. I vote no e-bikes on any of our trail systems. If the person riding the e-bike can't bike on a regular bike, they should not be allowed on the trails. Perhaps it is time to talk about trails for bikes and trails for hikers.</p>
01.23.2021	Tom Kilmer	tom.montana.2011@gmail.com	<p>Attached are my comments regarding proposals to motorize our non - motorized trails. Can you please share these comments with the members of HOLMAC? Thanks so much.</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>Please accept these comments for the record regarding the discussion and proposal to allow motorized bicycles on Non – Motorized Trails in Helena, Montana.</p> <p>Background: I am a 70-year-old native of Helena, Montana.</p> <p>I started walking in our south hills and on Mount Helena when I was 8 years old.</p> <p>When I was in High School I ran in the South Hills on training runs for track and cross country. As an adult I continue walk in the South Hills and on Mount Helena.</p> <p>I also was an avid runner during my younger adult days, spending many hours running in the South Hills and on Mount Helena. When Mountain Bikes came along I started bicycling in the South Hills and on Mount Helena. I still do that on a normal human powered, non – motorized bicycle.</p> <p>Our South Hills and Mount Helena Trails (Trails) were designed and built to non – motorized standards and are currently managed for Non – Motorized use only. This is as it should be. People need areas where motor vehicles are not allowed. We need these places to enjoy nature, exercise, and test ourselves without the use of motors.</p> <p>When I am on the trails I see healthy runners of all ages testing and strengthening their bodies and relaxing their minds. I see runners who are committed to a healthy lifestyle and who use our trails for that purpose. I see people who are getting in shape by walking, running or bicycling. Perhaps they had an epiphany, or perhaps they were directed by their doctor to get in shape. Regardless of the reason, they use and enjoy the non – motorized trails. Converting our trails to motorized trails by allowing motorized bicycles would be a slap in the face, an insult, a stab in the back to those trail users. Our trails were designed and constructed to non – motorized standards. Trails designed and constructed to motorized standards are completely different. That is due to the speed, the weight and the bulk of motorized vehicles and their resulting impacts on the trail surface.</p> <p>Motorized bicycles are 30-40 % heavier than normal non – motorized bicycles. When straddled by a heavy rider the increased weight of these machines will pound our trails into submission. It is because of a simple law of physics.</p> <p><i>Force = Speed X Mass.</i> Our trails are already stressed because they are popular.</p>
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E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

		<p>Add in the stresses from heavy motorized bicycles and our trails will be severely damaged. Our trails are simply not designed to be ridden by motorized vehicles.</p> <p>Force = Speed X Mass also relates to safety on our trails. The usual walking speed for humans on level ground is 2 miles per hour (mph). Motorized bicycles can travel in excess of 20 mph on level ground and much faster downhill due to the effects of gravity on the mass of motorized bicycle and the rider. If you allow motorized bicycles on our trails you are going to see accidents between motorized bicycles and humans. People will be severely injured or killed.</p> <p>Just as a semi –truck on the highway takes much longer to stop than does a Subaru; a speeding motorized bicycle will take much longer to stop than a normal human powered bicycle. This is due to the increased weight of the motorized bicycle /rider combination. The rider on the motorized bicycle might see a human on the trail, but the rider will not be able to stop in time to avoid hitting the unsuspecting walker or runner.</p> <p>Are you familiar with the “40 Inch Rule”? Please allow me to discuss it. For many, many years United States National Forest Service (U.S.F.S.) regulations prohibited the use of motor vehicles wider than 40 inches on National Forest Trails.</p> <p>Then along came the invention of the 4 wheeler, motorized all terrain vehicle. These things are wider than 40 inches. The manufactures of these vehicles wanted to sell millions of them to American consumers. To do that they needed to find a place where those 4 wheelers could be ridden. So what they did was go to the U.S.F.S in secret, with no public involvement, with no public comment, with no public disagreement, and convinced the U.S.F.S. to do away with the 40-inch rule.</p> <p>The result was a plague of 4 wheeler atvs unleashed on U.S.F.S. trails. The result became an utter disaster on public trails. Weeds. Rutting of trails. Widening of trails from simple single tracks to multi – tracked messes that no longer resembled trails. Non – motorized users were displaced. Wildlife was displaced. Once narrow single-track trails became high-speed motor vehicle routes. This happened because the U.S.F.S. decided that the next great shiny thing was appropriate for use on trails.</p> <p>The motorized bicycle manufacturing industry and their retail sales outlets and mountain bike promoting organizations such as the International Mountain Bike Association (IMBA) would like you to allow this next great shiny thing on our non – motorized trails. To them it is about power and money. More than that, the</p>
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E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>tourism industry would like you to allow this next great shiny thing on our trails so that they can sell more motel and hotel rooms and more meals and drinks. But beware. The result would be another disaster similar to the revocation of the 40-inch rule. Our trails will break down. Non – motorized trail users will be hurt. Non–motorized trail users will have to look elsewhere for safe and pleasant trails. Sometimes land management authorities do the right thing when pressured to allow the next great shiny motorized thing access to public lands.</p> <p>A recent case in Montana proved this out. A gentleman with a motorized hovercraft approached our Montana Fish Wildlife and Parks Department wanting them to change the rules to allow use of motorized hovercraft on small streams and rivers in Montana. Oh yeah, he also had a financial stake in the marketing of these devices.</p> <p>Citing the potential effect these motorized hovercraft would have on non –motorized water users, the general quiet, wildlife, water quality and vegetation our Fish Wildlife and Parks Department wisely said no.</p> <p>It is best to get In Front of these issues and look at what could happen. It does not work out well in the end to approve motorized vehicles prior to accessing the potential impacts. See the 40 Inch Rule discussion above as a warning.</p> <p>I am aware that motorized bicycles come in various stages of power. Those power stages range from fast, to faster, to Nascar fast. I am also aware that proponents of motorizing our non – motorized trails claim that they only want the low power (fast) motorized bicycles on our trails. My reaction to that is this: Who exactly is going to enforce that restriction?</p> <p>Will it be PPLT ? No, I don't think so. PPLT has the contract to maintain our trails but they have no Enforcement authority. Will it be HOLMAC ? No, I don't think so. Not unless the city pays the HOLMAC committee 24/7/365 to patrol the trails. Will it be the Helena Police Department? No, I don't think they would be interested because they are really busy policing drunks, meth heads and wife beaters. Will it be the Helena Parks and Recreation Department? No I don't think so. They don't have any Trail Rangers on staff. If the Helena City Commission votes to allow motorized bicycles will each Commission member in turn agree to stand patrol on the trails? What about Self-Enforcement? Have motorized bicycle riders inspect each others motorized bicycle to insure they do not have too much horsepower? Ha, Ha.</p>
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E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>If you want to see how Self Enforcement works take a walk on our trails and count all the dog turds and bags of dog turds. Notice all the dogs running loose from the parking lot. Nope. Self Enforcement does not work for dog owners, and it would never ever work for motorized bicycle riders.</p> <p>The truth is, once you would open our trails up to motorized bicycles there would be NO control over the power and speed of motorized bicycles utilizing our trails.</p> <p>We both know that as with cars, and motorcycles and 4 wheelers and snowmobiles and airplanes and boats, basically anything motorized, these motorized bicycles will only get faster and more powerful. Harley Davidson now makes and sells an electric motorcycle. In theory those would be allowed on the trails if you open them up to motorized bikes. After all, motorcycle riders like to call their machines “Bikes” I have even read that there will soon be electric off road motocross style motorcycles out soon. That tells you how much power those electric motors are capable of.</p> <p>My Grandmother was a hiker and Wilderness walker and backpacker for many, many years. She was hiking and backpacking still at 80 years old. When she finally started to give out and was no longer capable of hiking she still supported non – motorized trails. She still donated to Wilderness groups.</p> <p>What she did not do was commence to whining and demanding that because of her advanced age and bum knees she should be allowed to utilize a motorized vehicle on non –motorized trails. I am just amazingly astounded at the self entitlement of some local trail users who think that now is their time in their “advanced age” and because of their “bum knees” to be rewarded for their history of non – motorized travel to be granted their “right” to use motorized bicycles on our trails. To that I say give it up. You had your time. Savor the memories.</p> <p>My time also will come when I can no longer hike and pedal our non – motorized trails. When that time comes I will give it up to a new younger generation.</p> <p>I’m certainly not one to tell people not to purchase motorized bicycles. But I will certainly suggest more appropriate places to ride them Helena has hundreds of miles of very nice streets that are perfect for riding normal pedal bicycles and motorized bicycles. During my 30-year full time working career here in Helena I bicycled to work year round. Despite my rather advanced age (not sure how that happened) I still ride my</p>
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E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>normal pedal bike from 2nd street out to St Peters Health where I have a little occasional job 3-4 days a month.</p> <p>Out in the country motorized bicycles would be excellent on some of the hundreds of miles of unpaved Lewis and Clark County roads. The Helena National Forest and the Bureau of Land Management also have hundreds of miles of interesting un – paved roads near Helena that would be fun to explore on motorized bicycles. In summary : Please do not motorize our non – motorized trails.</p> <p>Tom Kilmer ; 621 2nd Street; Helena, Montana 59601</p>
01.27.2021	Dennis McMahon	galumphant22@gmail.com	<p>Regarding e-bikes on our open-lands trails, we should think about those trails' carrying capacity; especially in light of the fact that the trailheads are within an easy walk of thousands of households. They'll have to serve thousands of trail-users.</p> <p>A trail-user's negative effect on a trail, and upon the experience of other trail-users, will increase with the bulk and the speed of whatever hardware he's employing. The least bulky and least speedy trail-users are pedestrians, so it stands to reason that, if we want to serve the greatest number of potential users, we should favor pedestrians. This is especially true if the trails are already heavily used by pedestrians and, as I've pointed out, the trailheads are within an easy walk of so many of them.</p> <p>I've been walking those trails for half a century. I had a small part in the effort in the early 1970s when we "rediscovered" Mount Helena Park and began building our present open-lands system -- back when even mountain bikes were still a harmless curiosity. From the very beginning we thought of those trails as a pedestrian amenity, and we made a point of excluding motorized access. The trails, ever since, have functioned as a walkable extension of our walkable town -- every bit as pedestrian-friendly and motor-free as the sidewalk system. Are we now to begin thinking of them as roads?</p> <p>The argument that e-bikes aren't really motorized is the sort of definitional hair-splitting that simply doesn't make sense. The people who build e-bikes talk freely about their "motors". What else can we call them? Even the least-powerful e-bikes are built to go 20 mph, and it seems safe to assume that the average user will take full advantage of that capacity, given the opportunity. It also seems safe to assume that e-bikes will continue to be "improved", getting more efficient, faster, better at hill-climbing, etc, until there'll be little practical difference between them and traditional dirt-bikes.</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>Regarding the argument that e-bikes are needed to allow us to keep using the trails as we age and "our knees give out", I'm reminded of another argument I once heard, that "we should build roads in the Bob Marshall Wilderness so that less-able folks can get in and enjoy it". At age 73, I probably fit in that ageing category, but I certainly don't expect to be allowed the use of hardware that'll have an increased negative effect on the experience of other trail-users and upon the resource itself. I have too much respect for both.</p> <p>So, I'm sure there's room for e-bikes somewhere -- just as there's room for traditional dirt-bikes and snowmobiles -- but it's not in Helena's open-lands system. That system is for folks on foot, out to experience the resource for its own sake. It's a "sense of place" matter. Is trail-use there all about the place? --or about the hardware?.</p> <p>Thanks for considering these remarks. I really appreciate the chance to share them.</p>
02.02.2021	Margaret Regan	mregan@mt.net	<p>Dear Sirs/Madams,</p> <p>I am concerned about local trail use.</p> <p>E-bikes are motorized vehicles and should not be allowed on multiple-use, non-motorized trails. E-bikes should be considered just like motorcycles and ATVs and kept in zones designated for them.</p> <p>Hikers may have the right-of-way but who in their right mind would stand in the path of a swiftly moving bike? The hiker will always yield, which can mean scrambling off into the brush and rocks. The two forces are not equal. Tricky enough as is, without adding the motor component and even more bikers.</p> <p>Locally, there are plenty of places for e-bikes: https://www.fs.usda.gov/detail/hlcnf/news-events/?cid=FSEPRD670240</p> <p>"On the Helena-Lewis and Clark there is about 2,500 miles of motorized roads and about 800 miles of motorized trails," says Jennifer Becar the Acting Public Affairs Officer for Helena-Lewis & Clark National Forest.</p> <p>"There is plenty of opportunities for the public to go out if that's how they like to recreate there's lots of opportunities on the Helena-Lewis and Clark for that."</p> <p>Please do not allow e-bikes on our current non-motorized trails.</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>Thank you.</p> <p>Margaret Regan; 318 Chaucer; Helena, MT</p>
02.03.2021	<p>Ashley Seaward PeopleForBikes Coalition P.O. Box 2359 Boulder, CO 80306 720.648.8376</p>	<p>ashley@peopleforbikes.org</p>	<p>Jennifer,</p> <p>Attached is a letter from PeopleForBikes commenting on behalf of the electric bicycle discussion that has recently been on the agenda of the Helena Open Lands Management Advisory Committee. If you could please forward our letter to the committee members or provide me with an email to contact the committee, I would greatly appreciate it.</p> <p>Thank you! (SEE "ATTACHMENT A-1")</p>
02.08.2021	<p>Beverly Magley</p>	<p>beverlymagley@yahoo.com</p>	<p>To Helena Parks, Mayor and Commissioners, and HOLMAC members,</p> <p>Several decades ago, I was privileged to serve on the Open Space Bond steering committee. Also several decades ago, I converted my mountain bike to an e-bike so I could better manage to ride on Helena's hilly terrain. I have commuted to work and done errands on my e-bike since then. It's an absolute joy to get that motor assist as I head up Rodney Street's daunting slope — I love my electric bike.</p> <p>Early on, I also rode on many of Helena's trails. I quickly realized that a motorized bicycle has no business on paths that are used by hikers, dogs, families, and other mountain bikers. The motor assist makes it more possible to add speed, and thus is more dangerous on shared paths.</p> <p>I initially considered a gas-powered conversion kit vs. an electric, and for many reasons I opted for the electric. But they are not fundamentally different. Both have motors; both are motorized bikes. If you allow any motorized conveyance on our city trails, then where does it stop? It's a slippery slope best left with no ambiguity and no chance for a cry of discrimination against one kind of motor over another. A motor is a motor. And motorized vehicles do not belong on our quiet city trails.</p> <p>One source I found states that Montana has more than 31,000 miles of roads* on Forest Service and BLM lands. Surely that provides ample opportunities for motorized backcountry riding?</p> <p>Thank you for considering this, Beverly Magley 805 S. Rodney To Helena Parks, Mayor and Commissioners, and HOLMAC members,</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>Several decades ago, I was privileged to serve on the Open Space Bond steering committee. Also several decades ago, I converted my mountain bike to an e-bike so I could better manage to ride on Helena’s hilly terrain. I have commuted to work and done errands on my e-bike since then. It’s an absolute joy to get that motor assist as I head up Rodney Street’s daunting slope — I love my electric bike.</p> <p>Early on, I also rode on many of Helena’s trails. I quickly realized that a motorized bicycle has no business on paths that are used by hikers, dogs, families, and other mountain bikers. The motor assist makes it more possible to add speed, and thus is more dangerous on shared paths.</p> <p>I initially considered a gas-powered conversion kit vs. an electric, and for many reasons I opted for the electric. But they are not fundamentally different. Both have motors; both are motorized bikes. If you allow any motorized conveyance on our city trails, then where does it stop? It’s a slippery slope best left with no ambiguity and no chance for a cry of discrimination against one kind of motor over another. A motor is a motor is a motor. And motorized vehicles do not belong on our quiet city trails.</p> <p>One source I found states that Montana has more than 31,000 miles of roads* on Forest Service and BLM lands. Surely that provides ample opportunities for motorized backcountry riding?</p> <p>Thank you for considering this; Beverly Magley</p> <p>https://leg.mt.gov/content/Committees/Interim/2015-2016/EQC/Meetings/Sept-2015/hj-13-summary-road-info-mt-usfs.pdf</p>
02.09.2021	Lynne Boone	Imboone@earthlink.net	<p>Hello,</p> <p>I understand e-bikes are being considered to use on city trails. I have concerns about this. E-bikes are going to evolve as technology improves which will permit them to go faster. This presents a safety issue for walkers/hikers.</p> <p>Regular bike use on city trails is a problem and allowing e-bikes will only exacerbate the problem. Issues:</p> <ul style="list-style-type: none"> • many city trails have limited visibility and several sections are narrow, steep, or in sloped areas where it is difficult to get off the trail to let bikes pass.

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<ul style="list-style-type: none"> • some bikers do not follow the rules of etiquette, such as giving warning that they are present. Some also assume they have the right of way. • the majority of users of city trails (especially closer to town) continue to be walkers, many of whom are aging, have young children or pets with them, or have ADA/health issues that affect mobility, hearing, or vision. <p>Bikers have the ability via their bikes and trail rider bus to be transported to areas further out of town. There is room for varied trail users but the City trail system, especially closer to town, does not seem to be a good place for e-bikes nor promotion of increased regular bike usage, unless issues sited above can be addressed to promote safety for all.</p> <p>I am disturbed by the video I have seen of a group of mountain bikers cruising along the Ridge trail heading towards town. I have hiked that trail. It and many other connecting trails in that area are examples of the visibility, steepness and narrowness issues mentioned above. Hiking should be a relaxing experience without having to worry about a bunch of bikes suddenly appearing. With the increase in trail usage by many, accidents and incidents are inevitable.</p> <p><u>I know there is interest in bringing more visitors to the Helena area and promoting outdoor activities, such as on Helena’s great trail system. However, what’s the tipping point when trails and other amenities become too crowded and these things are no longer as enjoyable as they once were? I lived in Colorado (various ski towns, Boulder, Evergreen) in the 70’s and early 80’s. Places got to a point where the locals left town when the tourists showed up, communities became too expensive to live in, and places lost the appeal they once had. As the old saying goes, be careful what you ask for.</u></p> <p>Also, what is the status on the ponderosa trees that were going to be planted in the Beattie St. trailhead parking lot area? Thank you, Lynne Boone</p>
02.11.2021	David Nimick Angie Leprohon	dgpiper@mt.net	<p>Dear Helena Open Lands Management Advisory Committee,</p> <p>We appreciate that the City is considering the issue of if (and where) e-bikes might be allowed on trails within Helena Open Space Lands. This is an appropriate and timely topic for the City’s consideration, and a full evaluation and public process is certainly warranted.</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>As South Hills residents who allow hikers and bikers to cross our property (on a trail that connects Cox Lake to Top of the World and the Rodney Ridge trail), we would like to highlight the following bigger issues we think need to be addressed before any decision about e-bikes is made.</p> <ol style="list-style-type: none">1. Helena is very fortunate to have our existing South Hills trail system. This trail system is one interconnected system, but it is spread over lands administered and/or owned by different entities (the City, Lewis and Clark County, USFS, BLM, and a number of private landowners like ourselves). We don't have individual trail systems confined to land solely owned/administered by a single one of these entities. Therefore, any discussion of big picture issues related to South Hills trails would be best discussed in a collaborative forum involving all land managers/owners (as well as the general public), and trail rules/regulations would be best if they were the same across the entire trail system.2. Use of the South Hills trails increased dramatically during 2020. This level of use undoubtedly will persist and most likely continue to increase. But, with more use has come more conflict and resource damage. This increased use accentuates the value and need for accelerating efforts to plan and manage the trail system as well as the need for a very substantial expansion of the current trail etiquette education program, which to date, has not been able to adequately curb user conflicts and resource damage or ameliorate safety concerns.3. There is interest among some in the community to open the South Hills trail system to e-bikes. Proponents will argue that e-bikes are fun and allow many folks lacking the strength, stamina, and/or mobility needed for mountain biking to access more of the trail system, and that all conflicts and impacts can be addressed through better trail etiquette. Opponents will argue that motorized use should continue to be restricted and allowing any type of motorized use is a slippery slope inevitably leading to more types of motorized use. <u>More importantly, in our opinion, is the bigger question of how much bike use actually is appropriate on South Hills trails.</u> Realistically, opening trails to e-bikes will lead to increased overall bike use in the South Hills because the total number of bikers will increase and because individual e-bikers can and will ride longer distances than they would on a non-motorized bike. And, increased overall bike use will increase bike-associated resource damage to trails and the lands traversed, safety concerns, and conflicts between trail users. Therefore, developing a full understanding of the current and future extent of these bike-associated issues is essential before any decision is made to expand bike use. <p>In conclusion, we have two recommendations:</p>
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E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<ol style="list-style-type: none"> 1. Our first recommendation is that the City participate in and help fund a trail-system-wide effort to design and implement a robust, comprehensive trail etiquette education program for the South Hills trail system. This program should not only address issues related to resource damage, trail-user conflicts, and safety concerns, but also saturate the consciousness of the town’s trail-use interests and generate a culture of use-awareness, trail civility among user interests, and a sense of ownership and responsibility to maintain and protect the trail system. We believe a more robust program is needed just to address current levels of trail use. Consideration of e-bike use should only begin after this new etiquette education program has been implemented and its effectiveness demonstrated. 2. Our second recommendation is to initiate as soon as possible a robust planning process that considers existing use, safety and etiquette concerns, and trail conditions but also looks ahead 10-20 years. This planning effort should be integrated and community-driven and should rely on ample data, appropriate trail and resource expertise, and adequate funding. A system wide management plan developed through such a process then can be used to guide any major change to the trail system, whether the change is creating new trails, designating specific trails for any particular use, or allowing new user categories (such as e-bikes). <p>As partners in the creation of the South Hills trail system, we thank you in advance for considering our thoughts. We will be happy to provide any additional detail or explanation that might be helpful.</p>
02.12.2021	Billie Miller	billiemiller007@gmail.com	<p>To the Mayor and City Commissioners,</p> <p>I would like to express my opinion about the inappropriateness of e-bikes on the trails around the city.</p> <p>I am a daily user of the trails, happy to greet other hikers, our former governor, coyotes, deer and cyclists. The trails and their environs are a blessing to all of us, especially in this strange year of Covid. I am also retired from a career working with people who have disabilities. One of my guiding values was that all people should have the same opportunities as all other people. For most areas in life—opportunities, jobs, school, social opportunities—that value fit and was the kindest way to approach situations. I don’t think that it applies here.</p> <p>By virtue of gender, ability, interest, ownership or other life-reasons, not every place should be made accessible or available to everyone. The unique beauty of a place can be destroyed when, say, a trail is</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>paved to accommodate wheelchairs. That is NOT to say that some trails shouldn't be paved; some should be. But not all should be.</p> <p>E-bikes fall into that category. It is an aid, a boost to make an activity possible that otherwise might not be available to someone. Potentially, it can be a way to equalize movement and access. And yet, it is a mistake and a fraud to mislead people into thinking that they can have whatever they want. The assault on the Capitol is the most tragic and exaggerated recent example of this belief.</p> <p>We have to learn to treat our natural resources as unique, honoring that which is special. Sometimes that means not making access easy to everyone. For the same reasons that unfit people should not scale Mount Everest, people with physical challenges should not be able to motor themselves into the woods. they become a danger to themselves, and to others who are there under their own power.</p> <p>Perhaps there are some trails that should be made accessible to e-bikes and other adaptive equipment. Thorough review of trails, use, user opinions, safety issues, availability of rescue crews and other relevant factors should be undertaken to determine which trails those should be. For now, I ask that you restrict trail use to those who are already allowed.</p> <p>Thank you. Respectfully, Billie Miller</p>
02.21.2021	Michael and Carol Lowman	ionbatteryrunaway@gmail.com	<p>I am writing in regard to the use of e-bikes and other battery-powered transportation devices proposed for use on open lands in the city of Helena. (I learned about this issue from a family friend who lives in Helena.) I work in the transportation sector and interact with lithium-ion and lithium-metal batteries on a regular basis.</p> <p>I present these comments as a concerned citizen with considerable expertise as a result of my work and research into in lithium batteries and the hazards inherent with their use. E-bikes and other e-transportation devices are solely powered by high-charged, large (over 100 watt hours (Wh)) lithium ion batteries. The danger is that the lithium batteries used by e-bikes and other e-transportation devices are subject to thermal runaway (meaning, they overheat and catch fire). They pose a significant fire danger to your city, its natural surroundings, and the general population should they catch fire on your open lands. At this</p>

E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>time, there is no non-volatile technological alternative to lithium batteries adopted for use by the e-bike industry.</p> <p>Given your beautiful city's close proximity to thickly forested lands and grasslands, I urge you to carefully consider the inherent and very real fire danger posed by the use of these batteries as you formulate policy on lithium battery-powered transportation devices such as e-bikes.</p> <p>I encourage you to read this short article in <i>Bicycle</i> magazine and watch the short video in its entirety: https://www.bicycling.com/bikes-gear/a28778383/electric-bike-explosion/. If you permit the use of e-bikes and e-transportation devices, similar thermal runaway events could occur on your open lands in a tinder-dry year. The video of the Lime e-bike fire is typical of a lithium battery fire: as each of the numerous cells explode, the battery spews flames eight feet or more from the bike.</p> <p>Lithium batteries can burn at over 3,632 °F (2,000 °C). The resulting metal fire is difficult to extinguish, and this kind of lithium battery fire cannot be extinguished with small amounts of water and/or a household extinguisher. It requires a Type D extinguisher, which is rarely owned by anyone other than fire departments. For more information on how lithium batteries are fast-burning, long-lasting, and extremely hot, I refer you to this article: Research on Fire Extinguishing Technology for Power Lithium Batteries.</p> <p>Lithium battery fires are not rare, in my experience. Here is a chart of FAA-documented lithium battery fires on aircraft, which are required to be reported due to the type of fire: https://www.faa.gov/hazmat/resources/lithium_batteries/media/Battery_incident_chart.pdf. I am including some basic information on lithium batteries and e-bikes in case it is helpful to your deliberations.</p> <p>Lithium Battery Basics</p> <p>Lithium-ion batteries are used in e-bikes and other e-transportation devices because they are rechargeable and used repeatedly. As a matter of scale, the iPhone XS has a rating of 10.35Wh to 12.08Wh. A lithium-ion battery installed in an e-bike can range from 400Wh to well over 1,000Wh. Thus, E-bike batteries can have, in some cases, over 80 times or more the power of an iPhone.</p> <p>Lithium batteries are highly regulated in aviation due to recurring instances of catching on fire due to thermal runaway. These incidents can occur if the batteries are damaged by impact, over-charged, or short-circuited.</p>
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E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>Sometimes thermal runaway occurs for undetermined reasons. This has led to several catastrophic incidents in aviation (Dubai UPS crash and Asiana crash, as examples). These tragic events occurred despite built-in fire suppression systems on airplanes, which are obviously not available on e-bikes and other e-transportation devices.</p> <p>Due to these factors and the unpredictability of thermal runaway, lithium-metal and lithium-ion batteries are prohibited on passenger aircraft in checked luggage or as cargo. Lithium batteries are only allowed (in small quantities with several restrictions) in the cabin of an aircraft; in the cabin, a fire can be fought—by crew members with specialized training and tools. Even a “small” lithium battery can cause a plane to divert course due to the danger of uncontrolled fire (UA flight diversion).</p> <p>From this People Magazine article you can see that the U.S. Consumer Protection Safety Commission (CPSC) has officially warned against purchasing repackaged 18650 lithium batteries, which are the ones used in e-bikes. (In fact, an e-bike battery is comprised of numerous 18650 cells.) The CPSC is particularly concerned about the potential hazards of high-energy batteries and has directed its staff to focus on mitigating the hazards.</p> <p>E-bikes and Other e-Powered Devices</p> <p>In addition to e-bikes, other battery-powered devices pose a threat when operated in open lands. In 2018, a lithium battery-powered drone ignited a 335-acre fire in Northern Arizona. In the Pacific Northwest, people on wilderness trails use lithium-powered transportation devices of all sorts: e-powered scooters, skateboards, unicycles, hover boards, Segway’s, etc. which poses a danger both to public lands as well as human and animal life. Here is a video of an off-road skateboard in action. Your policy should address these other lithium-powered devices in addition to e-bikes for the safety of all, including your natural resources.</p> <p>Due to the hazards involved, it would be prudent for the City of Helena to conduct a thorough safety/risk analysis (SRA) of all higher-watt-hour lithium battery-powered devices before allowing their use on open lands to determine whether the risk they pose can be mitigated to an acceptable level.</p> <p>Plainly put, an e-bike fire can be devastating in the best of urban conditions, in a forest, it could ignite a fire of devastating magnitude as illustrated in the articles above.</p>
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E-BIKE USE ON TRAIL SYSTEM - 03.07.2021 COMMENTS

			<p>Based on my extensive experience in responding to lithium battery incidents in aviation, I would recommend, at a minimum, a ban on e-bikes and other e-transportation devices on your open lands due to the energy contained in the batteries and the potential for a catastrophic fire event that could destroy your city and majestic surroundings.</p> <p>I can be reached at ionbatteryrunaway@gmail.com. if you have questions about of the information shared in this letter. I wish you all the best weighing this important decision, and look forward to visiting your lovely city sometime soon.</p> <p>Regards, Michael</p>
03.05.2021	Ann Brodsky	abrodsky@mt.net	<p>I didn't know how to write HOLMAC, so I'm writing both of you, hoping you can direct this to HOLMAC.</p> <p>I am an active and avid trail user in Helena, and have been for over 40 years. I'm not affiliated with any particular organization, but I'm aware that the City is considering the e-bike issue. The City may be a little behind in its work on this issue, so I'm writing to recommend the City begin a concerted effort at studying the issue now. I think that before making any decisions, the City should identify the problem(s), look at what other communities are doing, and explore reasonable options. I think it would be a mistake and premature for the City to adopt a policy without that information, and it would be particularly troublesome for the City to "open the gate," so to speak, which can't be closed later.</p> <p>My own experience on Mount Helena and the Ridge Trail involves not e-bikes, but bicycles careening down hills without good line of sight, and practically running into hikers. On one occasion a couple of years ago, a bicyclist actually biked into my dog (who had the right of way). I'm not saying all bicycles should be banned. But this problem of competing uses will only increase with more people, and a thorough study of options, trail use, and what other communities are doing are – in my opinion – essential before the City takes irrevocable action.</p> <p>Thank you for this consideration.</p> <p>Sincerely, Ann Brodsky, Helena, MT</p>