

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

Date Submitted	Submitter	Email Address	COMMENTS	CITY RESPONSES/RECOMMENDATIONS
09.14.2021	Brittany Lee	<a href="mailto:britncady@aol.com">britncady@aol.com</a>	<p>Whom can I email in opposition of the proposed new leash laws on Helena Open Lands? It is a major benefit to this community to allow dogs to be under control but off leash.</p>	<p>Thank you for your comment. There are no new leash laws proposed on open lands, and that issue is not being contemplated as part of this process. Please see more information here:  <a href="https://helena.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=5745&amp;MeetingID=429">https://helena.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=5745&amp;MeetingID=429</a></p>
09.15.2021	Joe and Laurie Lamson	<a href="mailto:joelamson49@icloud.com">joelamson49@icloud.com</a>	<p>Friends,</p> <p>We were unable to attend the session but would like to offer the following suggestions.</p> <p>1) Continue the existing motorized travel ban on our trail system. E-bikes use a motor. They are motorized.</p> <p>2) On the subject of dogs. From our daily observations about 30-50% of the trail users on the Mount Ascension trails are dogs. Continue the basic policy that owners are responsible for controlling and cleaning up after their dogs.</p> <p>We do not support additional regs requiring dogs to be on leashes at all times. Current regs require dogs on leashes at the trailheads which is reasonable.</p> <p>On the trail it remains the owner’s responsibility to control their dog. That can be done through a variety of methods.</p> <p>The key is trail curtesy. So regardless of how you are enjoying our trails be considerate of others.</p>	<p>Thank you for your comments.</p> <p>1) E-bikes are being contemplated as a larger, City-wide process. Please see more information here:  <a href="https://beheardhelena.com/e-bikes-scooters">https://beheardhelena.com/e-bikes-scooters</a></p> <p>2) There are no new leash laws proposed on open lands, and that issue is not being contemplated as part of this process. Please see more information here:  <a href="https://helena.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=5745&amp;MeetingID=429">https://helena.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=5745&amp;MeetingID=429</a></p>

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>Thanks for all your good work.</p>	
<p>09.18.2021</p>	<p>Jeff Sherlock</p>	<p><a href="mailto:mookster007@gmail.com">mookster007@gmail.com</a></p>	<p>Good day, thanks for hosting the recent zoom meeting on your plans. I have to say I was shocked at actually seeing the new trail wending its way towards the existing Ambrose trail. It is steep, has high cuts through the gulleys it crosses. Maybe it is too late to stop Phase I but Phase Two would be an absolute eyesore across our beautiful mountain. For years, most folks in Helena have fought to preserve Mt Helena in its pristine state. Now we have proposed what is essentially a high visibility road that will forever scar the Mountain.</p> <p>I understand that mobility challenged folks need some assistance. But this road is steep on either end. I have to wonder if any disability groups were consulted about its construction.</p> <p>This reminds me of the old saying: we have met the enemy and it is us.</p> <p>Thanks for listening.</p>	<p>Thank you for your comments. Trail work began in the spring of 2021 on the Mt Helena ADA Trail. The trail was one of seven projects approved through the Helena Open Lands Management Plan annual projects process. Work slowed during the summer of 2021 due to weather and limited availability of materials due to the COVID-19 pandemic. On September 27, 2021, work was stopped by the City Manager out of concern for worker safety. The two weeks of work remaining on the project are anticipated before snow arrives in Helena.</p> <p>During the September 29, 2021 Administrative Meeting, this project was used as an example of how to implement the Communications Plan and Engagement Program created for Helena. This project was chosen due to the timely presentation of the first communications and engagement program alongside concern for changes in the project made during development.</p> <p>The project was proposed in 2019 by Helena Rotary who presented the concept to the Helena Open Lands Management Advisory Committee, City Staff, and the City's ADA Advisory Board. The project was then presented by Rotary at the 2020 Open Lands</p>

SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

				<p>Major Projects Meeting and brought through the Open Lands Public Involvement Process that included comment periods and four public meetings before approval.</p> <p>The first goal in the City newly adopted <a href="#">Helena Open lands Management Plan, Recreation Chapter</a> is to <i>provide safe and accessible recreational opportunities for all users. With the Guiding principles to: Ensure opportunities for all users to access; Maintain current levels of trail access and look for opportunities to expand access – in sections of existing trails as well as in new trail construction; Strive for a balance of providing multiple access points with concentrating access in specific areas to reduce public resource and user impacts; and Expand ADA access across the Helena open lands and meet ADA access requirements in all new infrastructure.</i></p> <p>This ADA accessible trail project not only implements a goal of the plan, but it also fulfills a previous recreation objective in the Open Lands Plan. In the 2004 Helena Open Lands Management plan, a recreation plan objective was included a planned special trail within Mt Helena City Park accessible to people with disabilities, the elderly, and those seeking a less rigorous trail experience. Helena Open Lands currently has only one</p>
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SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

				<p>ADA accessible trail on the east side of town at the Golf Course.</p> <p>Comments and feedback on the currently under construction trail have been overwhelmingly supportive and complimentary of the project throughout the public process. In the last two weeks, when the City of Helena Parks Department and the Helena City Commission have received multiple emails of concerns with the project.</p> <p>There have been questions raised about the trail's ADA compliance. It is important to note that Federal ADA standards provide <u>guidelines</u> to help ensure the trail is more accessible to individuals with mobility limitations. This trail is being built with an overall grade of approximately 5-6%. The following ADA guidelines are used in developing the trail:</p> <ul style="list-style-type: none"> <li>0-5% slopes for any distance</li> <li>6-8% for 50 feet of run (with interrupted 5' resting sections)</li> <li>9-10% slopes for 30 feet of run</li> <li>11-14% slopes for 5 feet of run</li> </ul> <p>The completed trail will be roughly one-half mile in length. ADA guidelines recommend a <u>minimum</u> width of 36 inches to accommodate a single wheelchair. This trail is being developed at 60-80 inches, to allow two wheelchairs to pass at any point on the</p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				<p>path. The current development does not represent the final width of the trail, as work will be done to narrow the trail as it is complete.</p> <p>The original proposal had a conceptual map presented by Helena Rotary that proposed a 2% slope goal. When construction began in the spring it was determined that the entirety of the proposed alignment would not be possible to maintain a 2% slope on that contour, nor would the terminus area be able to have an ADA accessible seating/viewing area. Minor modifications to the alignment of the trail have been made to reduce some slope/infrastructure needs, reduce the length of the trail, reduce the visual impacts, and modify the end point to avoid an area that was too rocky to develop. The Parks department consulted Rotary and informed the Parks Director who determined it was a minor modification not requiring further approval based on the following factors:</p> <ul style="list-style-type: none"> <li>• Change in the purpose of the trail or project.             <ul style="list-style-type: none"> <li>○ The purpose of the project is not changed. The purpose of the project, as proposed and built, is to provide recreation opportunities for individuals with limited mobility, who rely on wheelchairs, and for those who cannot ascend or descend the existing trails and expand access to Helena's</li> </ul> </li> </ul>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				<p>Open lands with opportunities that comply with the Americans with Disabilities Act.</p> <ul style="list-style-type: none"> <li>• Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands.             <ul style="list-style-type: none"> <li>○ The location of the project is not in a different drainage, draw, trailhead, or different area of open lands – part of the trail was realigned to an area above, on a different contour and to a modified terminus point due to physical challenges with rock.</li> </ul> </li> <li>• Changes to length of the trail more than one-half mile.             <ul style="list-style-type: none"> <li>○ The length of the trail shortened approximately 0.10 miles.</li> </ul> </li> <li>• Changes that are not acceptable to the project proponent (if not the City).             <ul style="list-style-type: none"> <li>○ Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail.</li> </ul> </li> <li>• Changes that negatively impact the environmental/wildlife/visual character of the trail or project.             <ul style="list-style-type: none"> <li>○ The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the trail – it is now less visible from any vantage point in town.</li> </ul> </li> <li>• Changes that increase the infrastructure impact/construction.</li> </ul>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				<ul style="list-style-type: none"> <li>o The change does not increase infrastructure and decreases construction activities.</li> <li>• Changes that increase the cost or duration of the construction of the project more than \$25,000 or more than one year.             <ul style="list-style-type: none"> <li>o The change does not increase the cost or duration of the project.</li> </ul> </li> </ul> <p>The constructed route, with the minor modifications, was shared with HOLMAC at the June 2021 HOLMAC meeting which included a trail walk off with flags. The city posted social media updates as well as media updates on trail development.</p> <p>Trail work began in the spring but was slowed during the summer due to weather and limited availability of materials related to the impact of the COVID-19 pandemic. Work this fall has involved a skid steer and mini excavator, which has made development more visible in the last two weeks coinciding with the concerns raised in the community. Our team will address concerns about erosion and limit visible impact as much as possible when the trail is completed. Staff has been diligent in ensuring animal habitat has not been harmed during development.</p> <p>The Parks and Recreation Department recently shared a proposal, through the</p>
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SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

				<p>Helena Open Lands Major Projects Process, to extend the ADA trail to meet up with the LeGrande Cannon Trail—referred to as a second phase or Phase 2. The presentation of this second phase was <u>only a preliminary proposal</u> and there are currently no formal plans for additional development. The City Commission established its policies for Helena’s open land as describe as the Vision and Goals in lands the Open Lands Major Projects Plan, Chapter 7-Recreation Plan. Additionally, the Public Involvement Process in of this Plan is outlined in Appendix P. During the September 29, 2021 Administrative Meeting, this project was used as an example of how to implement the newly created Communications Plan and Engagement Program for Helena. This project was chosen due to the timely presentation of the first communications and engagement program.</p>
09.21.2021	Kevin Eden Liz Eden	<a href="mailto:kveden@gmail.com">kveden@gmail.com</a> <a href="mailto:k.eden@bresnan.net">k.eden@bresnan.net</a>	<p>Dear all, On April 3, 2019 it was our great pleasure to send an email informing each of you that 90 ac on the west flank of Mt Helena had been purchased. In the 2 &amp;1/2 years since then, Liz and I and countless others have enjoyed this peaceful, rugged addition to our city's park. I also promised I would not write again asking for a donation after all of you were able to make that purchase possible with donations of almost \$45,000.</p> <p>Today, I'm asking for a donation of a different but equally important kind. I'm asking that you write an email or letter to the mayor and city commissioners  <a href="mailto:mayorandcommission@helenamt.gov">mayorandcommission@helenamt.gov</a>&lt;mailto:mayorandcommission@h</p>	Please see response above.



SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

			<p><a href="mailto:rschalk@helenamt.gov">elenamt.gov</a>&gt;), to City Manager Rachel Harlow-Schalk (<a href="mailto:rschalk@helenamt.gov">rschalk@helenamt.gov</a>&lt;<a href="mailto:rschalk@helenamt.gov">mailto:rschalk@helenamt.gov</a>&gt;) and to Parks and Rec (<a href="mailto:parksandrec@helenamt.gov">parksandrec@helenamt.gov</a>&lt;<a href="mailto:parksandrec@helenamt.gov">mailto:parksandrec@helenamt.gov</a>&gt;) regarding the bulldozing now underway above and below the Adams St. Trailhead. This is what it looks like just above the Trailhead.</p> <p><a href="#">[cid:image005.jpg@01D7B086.6B0588B0]</a> To us it looks more like a fire line than a trail and could possibly be used for removing thinned timber or access for work or fire vehicles.</p> <p>We were unaware of the magnitude of this project until, on 9/14, a City Zoom Listening Session was held to outline the project. We then learned of the intention to create an "ADA trail" to allow mobility-impaired persons to enjoy the "true Mt Helena experience". There are numerous problems with this description:</p> <ul style="list-style-type: none"> <li>• In the 120 + year history of Mt Helena Park preservation, there is no precedent for trail construction done in this manner, by bulldozing a 7 feet or wider path, to be covered with decomposed granite and subject to erosion due to poor trail drainage.</li> <li>• the slope in some places may reach as steep as 10% to my eye, not navigable by the intended user group and far greater than the 2% grade claimed by proponents.</li> <li>• when queried at the City listening session, staff was unable to document any direct outreach to the disabilities community about its support for, or involvement with, the development of this proposal.</li> <li>• although the original plan for the "trail" was about 1/2 mile (<a href="https://www.ktvh.com/news/work-begins-on-ada-accessible-trail-at-mount-helena">https://www.ktvh.com/news/work-begins-on-ada-accessible-trail-at-mount-helena</a>&lt;<a href="https://urldefense.proofpoint.com/v2/url?u=https-3A_www.ktvh.com_news_work-2Dbegins-2Don-2Dada-2Daccessible-2Dtrail-2Dat-2Dmount-">https://urldefense.proofpoint.com/v2/url?u=https-3A_www.ktvh.com_news_work-2Dbegins-2Don-2Dada-2Daccessible-2Dtrail-2Dat-2Dmount-</a></li> </ul>	
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SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

			<p><a href="https://www.google.com/maps/@47.2111111,-111.2111111,15z">2Dhelena&amp;d=DwMFaQ&amp;c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&amp;r=LxwVeY2V1N5Qi5Jbagvjv6k_YH5mEa58J0H5neA3BLY&amp;m=JJ7v2JE_tZb29GrEuKpHUekdZaA7_pkTTeGiZREIWkc&amp;s=O5K0BKlekiOSDXzphgNSFM-nWpdWm9V0o_blhOYERck&amp;e=&gt;</a>) the plan revealed at the meeting is for it to eventually traverse the full northern face of Mt Helena, all the way across the open space you helped purchase. I'd estimate this to be well over 4 mi. It will cross or in some cases replace an existing trail, terminating at The Road to Mars Trail.</p> <ul style="list-style-type: none"> <li>• there already exists a 5 mi roundtrip ADA trail on LeGrande Cannon Blvd (LGCB), completely flat and off road. It is the product of many citizens' efforts over 30+years and was a collaborative effort with the City of Helena. The LeGrande Cannon Trail was built for the very same purposes as this new proposal – an ADA compliant, shared use pathway. The proposed new trail is a duplication of LeGrande Trail's recreational offerings. A major goal of these efforts was to provide a "Mt Helena experience" to citizens with a wide range of abilities. Input from disabled persons for the existing LeGrande improvements was solicited throughout the planning process. In the closed section of LGCB, west of Silverette St, there is a true 1 mile long Mt Helena experience for citizens of all ages and abilities. Along its entire length it provides beautiful views of our mountain and city.</li> <li>• Finally, there is a second, shorter mobility-impaired proposal on the DeFord Trail that has documented support from the disabilities community, and offers few disruptions to the landscape. The City should be pursuing this option instead.</li> </ul> <p>There are more things to say about the trail, but perhaps most importantly is to cover another aspect of this project: the lack of public outreach and therefore public knowledge of the project despite its extensive impact on Mt Helena. I'd wager very few of you were aware of this project at all or at least not to the extent now planned. And you</p>	
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>are all citizens who support and use the trails and the continuation of closures on LeGrande Cannon Blvd (LGCB). Although a poorly publicized meeting was held, it was also poorly attended by the public. Obviously, whatever communication went out was not effective. Nate Kopp, PPLT trails director gave an excellent presentation for proposed trails on the Whyte addition that all of you helped to preserve, but PPLT was not involved in the planning or execution of the proposed project.</p> <p>There is a lot more that could be said about this issue but here is what is needed:</p> <ol style="list-style-type: none"> <li>1. If possible, walk a short section of the bulldozed section west of the trailhead. Perhaps take one or two pictures.</li> <li>2. Send emails to the mayor and commission, to the City Manager and to Parks and Recreation about your observations (addresses listed above).</li> <li>3. Add points you glean from your own research, or choose a few of the above points. Most importantly, implore the city commission to immediately halt the project at phase one, where it now appears to end. Ask that no further phases be considered. Do this now. And inform interested friends who may also want to write.</li> <li>4. City Parks and Rec is required to go through several more steps prior to a City Commission hearing on this project. However, now is the time to inform the City that there are serious flaws and concerns associated with this significant intrusion on our iconic Mt. Helena City Park. Write that email now!</li> </ol>	
09.21.2021	Jeff Sherlock	<a href="mailto:mookster007@gmail.com">mookster007@gmail.com</a>	<p>Dear Mayor and commissioners:</p> <p>It's me again. I promise to write no more letters to you for 6 months. I have serious concerns about the above project. Phase I is being installed right now and I have had a look at it. It is heartbreaking to see the scar that is being inflicted on our mountain.</p>	Please see response above.

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>I certainly am in favor of providing access to disabled folks. However, the benefit of that must be weighed against the efficacy of the project and the negative impacts on the environment. Phase II calls for widening 6780 feet of the Ambrose trail and constructing 4610 feet of new trail. Trail is a misnomer, since the new construction will be about 6 feet wide; frankly it looks like a road. If you doubt this, have a look at phase I.</p> <p>I am not sure of the elevation gain from the Mt Helena parking lot to the Ambrose trail, but it appears to be 150-200 feet. Some sections seems steep and on Phase II, some of the smaller gullies that are crossed will present challenges.</p> <p>My major concern is that, if constructed, this road will leave a quite visible scar across the face of Mt Helena. For the last many years, our community has struggled with the proper amount of development of the South Hills. To inflict this scar across the otherwise pristine and iconic backdrop to our City seems to ignore that struggle. This is especially so if there is no discernable benefit to our disabled neighbors.</p> <p>My suggestion is that before committing to Phase II, we study the results of Phase I. If disabled folks are not using Phase I, I would suggest that Phase II be abandoned.</p> <p>Thanks again for your time. Best regards</p>	
09.22.2021	David Hull	<a href="mailto:hulmac@bresnan.net">hulmac@bresnan.net</a>	The fire road across Mt Helena is a terrible idea. The scar will last forever. Stop it!	Please see response above.
09.22.2021	Richard and Helen Rietz	<a href="mailto:hlrietz@gmail.com">hlrietz@gmail.com</a>	<p>Parks and Recreation Department:</p> <p>We have recently learned of plans for an extensive ADA-accessible trail on Mt. Helena that would traverse the north face of our mountain park, replacing some of the existing trail system.</p> <p>THIS IS COMPLETELY UNNECESSARY, and the development of this trail should be halted at the current point and taken no further.</p>	Please see response above.

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>We are one of several couples who have donated generously from our own money and, working in conjunction with Prickly Pear Land Trust, met that need. Working together, we raised \$45,000 toward purchasing an extensive trail system off LeGrande Cannon Blvd., which runs for a considerable distance, is completely level and well paved, and close to parking for easy access. THIS TRAIL MEETS THE ADA REQUIREMENTS, which is one of the reasons we donated toward creating it. It offers a wonderful Mt. Helena experience, with extensive views in all directions.</p> <p>You have not reached out to the public with the full scope of your new plan, and have not documented any need or demand for an additional trail. And in pushing forward with your plan, you <b>insult those of us who put so much time, effort, and personal money into doing what you claim you are doing now.</b> What's more, your proposed trail would degrade the current, beautiful experience Mt. Helena offers to us all.</p> <p>Rest assured you will meet with our STRENUOUS AND HIGHLY PUBLIC opposition to what you propose. STOP NOW.</p>	
09.23.2021	Jeffrey Sherlock	<a href="mailto:Mookster007@me.com">Mookster007@me.com</a>	<p>Hi Kristi hope all is well with you. I have a couple of questions on the ADA trail and its possible extension. I am ok with an email response or you could call me at 438-3393.</p> <p>First on the EA for phase one, it is stated there is a map attached. The map is not on your website. Could I get a copy of the attachment??</p> <p>Next, and of most importance to me, is Phase II contemplated to be 8 feet wide?? I ask because ADA trail guidelines, as best I can find them, say an ADA trail should be 36 inches.</p> <p>Finally, have you folks received any documents from the disabled community used as input on the design of Phase I or II.</p>	Please see response above.

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>Thanks for your help and I want to report that the new poop station is working very well on LeGrande, people must be using it because I am seeing less poop on the ground that before.</p> <p>Best regards</p>	
09.23.2021	Pam Attardo	<a href="mailto:PATTARDO@lccountymt.gov">PATTARDO@lccountymt.gov</a>	<p>I was walking on Mt. Helena last week and noticed a large swath had been cleared on Mt. Helena. I asked A City employee or contractor who was operating the heavy equipment about the project, and he said it was for an accessible trail. I hadn't heard anything about this project prior to encountering the cleared area.</p> <p>Mt. Helena is an historic district (see attached 1996 nomination.). Like Hill Park, and other parks located within an historic district, the Heritage Tourism Council must be notified before projects are undertaken so that the HTC can give input. Mt. Helena has a number of archaeological and historical sites on it that may be damaged by projects like this. Just last week a citizen donated a projectile point to the HTC that had been found not far from the project.</p> <p>Can you please forward any plans and information associated with the project? Pam</p>	Please see response above.
09.23.2021	Dal Smilie	<a href="mailto:dalsmilie@aol.com">dalsmilie@aol.com</a>	<p>I suppose you will get lots of emails on this. All of them opposed to the ADA trail and any extension.</p> <p>I want to be one who shows support of the trail and any extension around the north side of Mt Helena. We have had two sets of friends drop by today very concerned about Ken Edens allegations, one left in a huff when hearing we were not up in arms about this.</p> <p>We live right on Mt Helena. We walk our dogs on it every day (unleashed mostly). We live right below this new trail.</p> <p>I served on the first Open Space Committee, helped fund and build the</p>	Please see response above.

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>little signage shelter at the main entrance, first suggested access to the main entrance be through Reeders Village, made sure land of ours in the GW Shaw Addition became part of the Park (with a proviso in the deed that it could be a sculpture park). We have done thousands of hours of weeding and removing broken glass and trash off the Park. We have helped HPD in rescuing a hurt mountain biker off the park.</p> <p>We did oppose the closure of Le Grande Cannon to the limited traffic it had. It was an emergency way in or out for us. I do not see it as a real ADA trail through its paved portion any more than any city street. The closure did lessen traffic by its main proponents house though.</p> <p>I like at least one trail that allows ADA use. It invites folks pushing strollers, recovering from surgery or who are just getting older to enjoy the Park. There ought to be a bench every couple of hundred feet. Like we see in Great Falls, Bend, OR and many other places. We would love to see it hook up to the Spring Meadow trails on one side and Last Chance Gulch or South Hills trails on the other.</p> <p>And of course open to those with well minded and unleashed dogs. And those on bicycles.</p> <p>We have many suggestions for how the City could take better care of the Park. But this trail, if built to ADA standards is one of them.</p>	
09.26.2021	Connie and David Cole	<a href="mailto:dcole@mt.net">dcole@mt.net</a>	<p>As residents of the Helena area for over fifty years, my husband and I have been devoted to land conservation and public service. As a 19 year board member of the Prickly Pear Land Trust, I helped steward the Mount Ascension Backdrop Initiative, protecting the view shed of our state Capitol. Other projects I was involved with included the Peaks to Creeks Initiative, creation of Ten Mile Creek Park, and the Prickly Pear Fishing Access Site. As Chair of the Citizens Advisory Committee of the Lewis and Clark Open Space Bond Program I was involved in preserving</p>	<p>Thank you for your comments. Trail work began in the spring of 2021 on the Mt Helena ADA Trail. The trail was one of seven projects approved through the Helena Open Lands Management Plan annual projects process. Work slowed during the summer of 2021 due to weather and limited availability of materials due to the COVID-19 pandemic. On September 27, 2021, work was stopped by</p>

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>over 13,000 acres of land permanently protected for public use that was funded with the approval of the Lewis and Clark County Commissioners.</p> <p>My husband has a similar record of public land conservation as a member for nine years of the City-County Planning Board and leadership efforts to protect limited groundwater resources and develop zoning in the Helena valley. Our experiences prompt our comments on the city’s construction of the so-called ADA trail on the west flank of Mount Helena, part of the citizen purchased City Park below the Adams St. trailhead.</p> <p>According to a city conducted zoom listening session on 9/14, the purpose of this trail is to provide mobility-impaired citizens the ability to enjoy the trails on Mt. Helena. According to news reports of the meeting, the plan for the trail was to be about ½ mile. However, recent visits to the construction site reveal a wide bulldozed trail to be surfaced with crushed granite that looks more ready for fire equipment rather than wheelchairs or canes. It appears that the City intends for this trail to extend for nearly four miles. Subsequent reviews of the site indicate slopes that appear to be approaching 10% grades, hardly in compliance with the 2% grades required for ADA compliance, and potentially subject to erosion.</p> <p>Ironically, an existing trail has already been created specifically as the purported reason for this trail; the LeGrande Cannon Trail – constructed as an ADA compliant pathway funded by collaborative citizens’ efforts and the City of Helena. Planning for this trail was the result of extensive public outreach and input from the disabilities community.</p> <p>The trail under construction is an example of “bait and switch” tactics by the City and citizen concerns must be addressed immediately. The project as constructed clearly has been misrepresented by City staff. Phase one must be redesigned. The trail under construction is in no way navigable by those who are mobility challenged. Where are the results of public outreach and collaboration? The acres for the expansion of the</p>	<p>the City Manager out of concern for worker safety. The two weeks of work remaining on the project are anticipated before snow arrives in Helena.</p> <p>During the September 29, 2021 Administrative Meeting, this project was used as an example of how to implement the Communications Plan and Engagement Program created for Helena. This project was chosen due to the timely presentation of the first communications and engagement program alongside concern for changes in the project made during development.</p> <p>The project was proposed in 2019 by Helena Rotary who presented the concept to the Helena Open Lands Management Advisory Committee, City Staff, and the City's ADA Advisory Board. The project was then presented by Rotary at the 2020 Open Lands Major Projects Meeting and brought through the Open Lands Public Involvement Process that included comment periods and four public meetings before approval.</p> <p>The first goal in the City newly adopted <u>Helena Open lands Management Plan, Recreation Chapter</u> is to <i>provide safe and accessible recreational opportunities for all users</i>. With the Guiding principles to: <i>Ensure opportunities for all users to access;</i></p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>City Park were negotiated by Prickly Pear Land Trust. Was Prickly Pear Land Trust involved in the current design and construction?          The City has repeatedly gotten into disputes when guidance involving procedures for public input has been overlooked or misinterpreted. City Commissioners, please do not allow this project to proceed without providing opportunities for additional public comment and involvement. Again, as constructed, the bulldozed trail in no way resembles the project presented during the Zoom meeting.</p> <p>We have been involved in over 30 years of providing for safe, inclusive opportunities to enjoy our beautiful City Park. At our age of over 75 years, we are extremely sensitive to mobility issues ourselves. Please continue to protect our City Park by reengineering and reconsidering this proposal.</p>	<p><i>Maintain current levels of trail access and look for opportunities to expand access – in sections of existing trails as well as in new trail construction; Strive for a balance of providing multiple access points with concentrating access in specific areas to reduce public resource and user impacts; and Expand ADA access across the Helena open lands and meet ADA access requirements in all new infrastructure.</i></p> <p>This ADA accessible trail project not only implements a goal of the plan, but it also fulfills a previous recreation objective in the Open Lands Plan. In the 2004 Helena Open Lands Management plan, a recreation plan objective was included a planned special trail within Mt Helena City Park accessible to people with disabilities, the elderly, and those seeking a less rigorous trail experience. Helena Open Lands currently has only one ADA accessible trail on the east side of town at the Golf Course.</p> <p>Comments and feedback on the currently under construction trail have been overwhelmingly supportive and complimentary of the project throughout the public process. In the last two weeks, when the City of Helena Parks Department and the Helena City Commission have received multiple emails of concerns with the project.</p>
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SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

				<p>There have been questions raised about the trail's ADA compliance. It is important to note that Federal ADA standards provide <u>guidelines</u> to help ensure the trail is more accessible to individuals with mobility limitations. This trail is being built with an overall grade of approximately 5-6%. The following ADA guidelines are used in developing the trail:</p> <ul style="list-style-type: none"> <li>0-5% slopes for any distance</li> <li>6-8% for 50 feet of run (with interrupted 5' resting sections)</li> <li>9-10% slopes for 30 feet of run</li> <li>11-14% slopes for 5 feet of run</li> </ul> <p>The completed trail will be roughly one-half mile in length. ADA guidelines recommend a <u>minimum</u> width of 36 inches to accommodate a single wheelchair. This trail is being developed at 60-80 inches, to allow two wheelchairs to pass at any point on the path. The current development does not represent the final width of the trail, as work will be done to narrow the trail as it is complete.</p> <p>The original proposal had a conceptual map presented by Helena Rotary that proposed a 2% slope goal. When construction began in the spring it was determined that the entirety of the proposed alignment would not be possible to maintain a 2% slope on that contour, nor would the terminus area be able</p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				<p>to have an ADA accessible seating/viewing area. Minor modifications to the alignment of the trail have been made to reduce some slope/infrastructure needs, reduce the length of the trail, reduce the visual impacts, and modify the end point to avoid an area that was too rocky to develop. The Parks department consulted Rotary and informed the Parks Director who determined it was a minor modification not requiring further approval based on the following factors:</p> <ul style="list-style-type: none"> <li>• Change in the purpose of the trail or project.             <ul style="list-style-type: none"> <li>○ The purpose of the project is not changed. The purpose of the project, as proposed and built, is to provide recreation opportunities for individuals with limited mobility, who rely on wheelchairs, and for those who cannot ascend or descend the existing trails and expand access to Helena’s Open lands with opportunities that comply with the Americans with Disabilities Act.</li> </ul> </li> <li>• Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands.             <ul style="list-style-type: none"> <li>○ The location of the project is not in a different drainage, draw, trailhead, or different area of open lands – part of the trail was realigned to an area above, on a different contour and to a</li> </ul> </li> </ul>
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				<p>modified terminus point due to physical challenges with rock.</p> <ul style="list-style-type: none"> <li>• Changes to length of the trail more than one-half mile.             <ul style="list-style-type: none"> <li>○ The length of the trail shortened approximately 0.10 miles.</li> </ul> </li> <li>• Changes that are not acceptable to the project proponent (if not the City).             <ul style="list-style-type: none"> <li>○ Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail.</li> </ul> </li> <li>• Changes that negatively impact the environmental/wildlife/visual character of the trail or project.             <ul style="list-style-type: none"> <li>○ The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the trail – it is now less visible from any vantage point in town.</li> </ul> </li> <li>• Changes that increase the infrastructure impact/construction.             <ul style="list-style-type: none"> <li>○ The change does not increase infrastructure and decreases construction activities.</li> </ul> </li> <li>• Changes that increase the cost or duration of the construction of the project more than \$25,000 or more than one year.             <ul style="list-style-type: none"> <li>○ The change does not increase the cost or duration of the project.</li> </ul> </li> </ul>
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				<p>The constructed route, with the minor modifications, was shared with HOLMAC at the June 2021 HOLMAC meeting which included a trail walk off with flags. The city posted social media updates as well as media updates on trail development.</p> <p>Trail work began in the spring but was slowed during the summer due to weather and limited availability of materials related to the impact of the COVID-19 pandemic. Work this fall has involved a skid steer and mini excavator, which has made development more visible in the last two weeks coinciding with the concerns raised in the community. Our team will address concerns about erosion and limit visible impact as much as possible when the trail is completed. Staff has been diligent in ensuring animal habitat has not been harmed during development.</p> <p>The Parks and Recreation Department recently shared a proposal, through the Helena Open Lands Major Projects Process, to extend the ADA trail to meet up with the LeGrande Cannon Trail—referred to as a second phase or Phase 2. The presentation of this second phase was <u>only a preliminary proposal</u> and there are currently no formal plans for additional development. The City Commission established its policies for Helena’s open land as describe as the Vision and Goals in lands the Open Lands</p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				Major Projects Plan, Chapter 7-Recreation Plan. Additionally, the Public Involvement Process in of this Plan is outlined in Appendix P. During the September 29, 2021 Administrative Meeting, this project was used as an example of how to implement the newly created Communications Plan and Engagement Program for Helena. This project was chosen due to the timely presentation of the first communications and engagement program.
09.27.2021	Judy Fay	<a href="mailto:judyfay@bresnan.net">judyfay@bresnan.net</a>	<p>Dear Helena City Parks and Recreation Staff,</p> <p>I am writing to express my concern about the trail project currently underway above and below Adams St. Trailhead being referred to as the “ADA” Trail. I am just becoming aware of the bulldozing that has happened on the mountain and I am not the only trail user in Helena who is only now being made aware of this project. I urge you to stop further work on this project until several key issues concerning the “ADA” Trail have been properly addressed.</p> <p>The project as it stands now does not appear to comply with the original 2020 proposal to the city. It was originally stated the trail would be 1/2 mile long. The current bulldozed area is 4 miles long. There is currently a five mile ADA, share-use pathway on LeGrande Cannon Blvd. One which involved the community in its conception and completion and is enjoyed by many. I further understand that the ADA community is not and has not been involved in this project.</p> <p>I ask that the disturbed area included in “Phase 1” of the project be reclaimed immediately and an open, widely publicized public discussion be held concerning the future of the project. Given the current 5 mile</p>	Please see response above.

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>ADA trail already in use, this project appears to be a duplication of efforts, time, and money.</p> <p>Thank you for your time and consideration of my comments.</p>	
09.27.2021	Dr. Michael Bergkamp	<a href="mailto:docberg@bresnan.net">docberg@bresnan.net</a>	Please stop the destructive work being done on Mt Helena. I support the ADA but this scar if destruction is a horrible outrage!!	Please see response above.
09.27.2021	Herb Winsor	<a href="mailto:hwinsor@mt.net">hwinsor@mt.net</a>	<p>Dear Sirs and Madams:</p> <p>My wife and I walk on Mt Helena most days. We were dismayed and disheartened at the efforts to construct this pathway which creates an unsightly gash on MT Helena. There must be a better way!</p> <p>Please immediately cease this project until proper public input is received.</p>	Please see response above.
09.27.2021	Jim Robbins	<a href="mailto:jimrobbins@mt.net">jimrobbins@mt.net</a>	<p>Dear City Manager, Parks and Rec and City Commission</p> <p>I am writing to adamantly oppose the bulldozing of Mt. Helena to create a new ADA accessible trail.</p> <p>I am shocked and saddened. The trail not only violates the near-wilderness spirit of Mt. Helena, it flies in the face of what the public was told about what the trail would be.</p> <p>I ask that work on this scar across Mt. Helena cease and that the public be informed about these kinds of projects with a careful planning process before they find out about it when the bulldozers begin work.</p>	Please see response above.
09.27.2021	Steve Platt	<a href="mailto:Splatt4570@gmail.com">Splatt4570@gmail.com</a>	<p>Dear Helena City Officials,</p> <p>Please halt activity on the ill-advised gravel path currently under construction on Mount Helena.</p>	Please see response above.

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>I try to stay up to speed on plans for Mount Helena as I live next to the mountain and walk there every day. I guess I missed the public outreach.</p> <p>I am also recently attuned and sympathetic to the difficulties inherent to negotiating public spaces with a wheelchair as my father was wheelchair bound for the 18 months of his life here in Helena. ADA access to Helena City parks is a great idea.</p> <p><b>However, this overbuilt path strikes me as something proposed by the City Parks Department in quiet consultation with local e-bike users and promoted under the guise of ADA access.</b> The local ADA community does not appear to have been consulted about this project. Furthermore, ( I learned this in recent City Parks e-bike discussions) other communities in the West often allow e-bike use on “hard” paths that look a lot like what is being built right this very minute in Mount Helena City Park. Supposedly the ADA path will connect across the east and north sides of the mountain to the paved path along Le Grande. A wheelchair accessible through trail? Trails on the north and east sides of Mount Helena are a sheet of ice for about half the year.</p> <p>It is time to halt construction and have an open community discussion about this project. The ADA community needs to be involved, so that the project meets their needs.</p> <p>Come on guys, it shouldn’t be this hard to get Helena City Parks projects right.</p>	
09.27.2021	Ms. Chris Deveny	<a href="mailto:Cmdeveny7@gmail.com">Cmdeveny7@gmail.com</a>	<p>Dear Helena Mayor, Commissioners and City Manager -</p> <p>I am writing to you in dismay and frustration after discovering the extensive construction of the “ADA Trail” occurring on our beloved Mount Helena. This destructive work is not even coming close to following the plan/proposal that was presented to the public in 2020 and</p>	Please see response above.



**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>approved by the Commission. The trail route, slope, elevation gain, length and overall magnitude of the project are all extremely different from the information provided.</p> <p><b>I implore you to <u>immediately</u> stop all trail construction, reclaim the resource damage done and open up a public discussion about this fiasco.</b> Also, please put a permeant stop to a Phase II plan which I understand would extend this unsound and unnecessary duplicative trail all across the north side of Mount Helena.</p> <p>Once again, I find myself very disappointed that our open space parklands are being so carelessly managed by our city personnel and leaders.</p> <p>Please keep me informed regarding this issue. Thank you.</p>	
09.27.2021	Joel Peden	<a href="mailto:jpeden@mtcil.org">jpeden@mtcil.org</a>	<p>Hi Kristi,</p> <p>I would like to formally introduce an Alternative proposal for the DeFord Trail project. Please find the proposal attached. I am available to discuss this proposal with you, your staff or HOLMAC. <b>(SEE ATTACHMENT "A")</b></p>	<p>Thank you for your comments submitted on behalf of the disability community. City staff recommends inclusion of the following elements of Mr. Peden’s proposal into the draft list of open lands system major projects for 2021:</p> <ol style="list-style-type: none"> <li>1.) Elements 1-3 with the modification that dog leash usage would be encouraged and downhill bicycle travel discouraged.</li> <li>2.) Elements 4 &amp; 5 would explored for potential implementation if feasible.</li> </ol>
09.27.2021	Gregg and Wendy Wheeler	<a href="mailto:westernwheelers@msn.com">westernwheelers@msn.com</a>	<p>Dear Mayor, Commissioners, City Manager and Department of Parks &amp; Recreation,</p> <p>As this summer progressed, we were quite surprised (and disappointed) at what appears to be an excessive “trail” on Mount Helena. After many years of helping with maintenance of various hiking trails on Mount Helena and elsewhere, the amount of soil disturbance seems unwarranted.</p>	<p>Thank you for your comments. Trail work began in the spring of 2021 on the Mt Helena ADA Trail. The trail was one of seven projects approved through the Helena Open Lands Management Plan annual projects process. Work slowed during the summer of 2021 due to weather and limited availability of materials due to the COVID-19 pandemic. On</p>

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>We urge work to stop on the new trail being developed across Mount Helena. Then involve stakeholders as to whether there is a need for a new trail and, if so, what is the best design to meet the requirements of the intended users and minimize the impacts on the mountain.</p>	<p>September 27, 2021, work was stopped by the City Manager out of concern for worker safety. The two weeks of work remaining on the project are anticipated before snow arrives in Helena.</p> <p>During the September 29, 2021 Administrative Meeting, this project was used as an example of how to implement the Communications Plan and Engagement Program created for Helena. This project was chosen due to the timely presentation of the first communications and engagement program alongside concern for changes in the project made during development.</p> <p>The project was proposed in 2019 by Helena Rotary who presented the concept to the Helena Open Lands Management Advisory Committee, City Staff, and the City's ADA Advisory Board. The project was then presented by Rotary at the 2020 Open Lands Major Projects Meeting and brought through the Open Lands Public Involvement Process that included comment periods and four public meetings before approval.</p> <p>The first goal in the City newly adopted <u>Helena Open lands Management Plan, Recreation Chapter</u> is to <i>provide safe and accessible recreational opportunities for all users</i>. With the Guiding principles to: <i>Ensure opportunities for all users to access;</i></p>
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				<p><i>Maintain current levels of trail access and look for opportunities to expand access – in sections of existing trails as well as in new trail construction; Strive for a balance of providing multiple access points with concentrating access in specific areas to reduce public resource and user impacts; and Expand ADA access across the Helena open lands and meet ADA access requirements in all new infrastructure.</i></p> <p>This ADA accessible trail project not only implements a goal of the plan, but it also fulfills a previous recreation objective in the Open Lands Plan. In the 2004 Helena Open Lands Management plan, a recreation plan objective was included a planned special trail within Mt Helena City Park accessible to people with disabilities, the elderly, and those seeking a less rigorous trail experience. Helena Open Lands currently has only one ADA accessible trail on the east side of town at the Golf Course.</p> <p>Comments and feedback on the currently under construction trail have been overwhelmingly supportive and complimentary of the project throughout the public process. In the last two weeks, when the City of Helena Parks Department and the Helena City Commission have received multiple emails of concerns with the project.</p>
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				<p>There have been questions raised about the trail's ADA compliance. It is important to note that Federal ADA standards provide <u>guidelines</u> to help ensure the trail is more accessible to individuals with mobility limitations. This trail is being built with an overall grade of approximately 5-6%. The following ADA guidelines are used in developing the trail:</p> <ul style="list-style-type: none"> <li>0-5% slopes for any distance</li> <li>6-8% for 50 feet of run (with interrupted 5' resting sections)</li> <li>9-10% slopes for 30 feet of run</li> <li>11-14% slopes for 5 feet of run</li> </ul> <p>The completed trail will be roughly one-half mile in length. ADA guidelines recommend a <u>minimum</u> width of 36 inches to accommodate a single wheelchair. This trail is being developed at 60-80 inches, to allow two wheelchairs to pass at any point on the path. The current development does not represent the final width of the trail, as work will be done to narrow the trail as it is complete.</p> <p>The original proposal had a conceptual map presented by Helena Rotary that proposed a 2% slope goal. When construction began in the spring it was determined that the entirety of the proposed alignment would not be possible to maintain a 2% slope on that contour, nor would the terminus area be able</p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

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				<p>The constructed route, with the minor modifications, was shared with HOLMAC at the June 2021 HOLMAC meeting which included a trail walk off with flags. The city posted social media updates as well as media updates on trail development.</p> <p>Trail work began in the spring but was slowed during the summer due to weather and limited availability of materials related to the impact of the COVID-19 pandemic. Work this fall has involved a skid steer and mini excavator, which has made development more visible in the last two weeks coinciding with the concerns raised in the community. Our team will address concerns about erosion and limit visible impact as much as possible when the trail is completed. Staff has been diligent in ensuring animal habitat has not been harmed during development.</p> <p>The Parks and Recreation Department recently shared a proposal, through the Helena Open Lands Major Projects Process, to extend the ADA trail to meet up with the LeGrande Cannon Trail—referred to as a second phase or Phase 2. The presentation of this second phase was <u>only a preliminary proposal</u> and there are currently no formal plans for additional development. The City Commission established its policies for Helena’s open land as describe as the Vision and Goals in lands the Open Lands</p>
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				<p>Major Projects Plan, Chapter 7-Recreation Plan. Additionally, the Public Involvement Process in of this Plan is outlined in Appendix P. During the September 29, 2021 Administrative Meeting, this project was used as an example of how to implement the newly created Communications Plan and Engagement Program for Helena. This project was chosen due to the timely presentation of the first communications and engagement program.</p>
09.28.2021	Gayle Joslin	<a href="mailto:joznpoz@bresnan.net">joznpoz@bresnan.net</a>	<p>Dear Mayor, Commission, Parks and Recreation Department, and City Manager:</p> <p>Where is the full and open public involvement in this “ADA” project?</p> <p>I am devastated and outraged at the gash being constructed across the face of Mount Helena. I have lived here, in my home town of Helena, for 70 years, loving and admiring our mountain. Growing up on the “west-side” I hiked, played, and ran all over Mount Helena as a child. From my point of view, the mountain has been overly constructed with all types of trails, but this one takes the cake! It is reminiscent of the illegal road that the Forest Service recently constructed south of Mount Helena in the South Helena Area. The Forest Service insisted that this construction was a “feature” NOT a road! (attached) The City of Helena endorsed that project.</p> <p>And ... we wonder why the public has so little faith in government! I am one who believes in process and good governance. But this level of construction for a “Trail” that doesn’t seem to have been properly vetted, is not displaying good governance.</p> <p>From what I have read, this steeply graded (up to 7%) route does not meet ADA standards, and completely duplicates the LeGrande Boulevard</p>	<p>Please see response above.</p>



**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>ADA route that already exists. So – who are you building this route for anyway???</p> <p>Please cease and desist in further construction. Explanations are needed. And certainly reclamation</p>	
09.28.2021	Michele Webster	<a href="mailto:michele.na.mt@gmail.com">michele.na.mt@gmail.com</a>	<p>Dear Mr. Mayor and Commissioners,</p> <p><b>I am asking you to immediately halt any activity on the ADA trail being built on Mount Helena if you haven't already done so.</b> As you probably know, based on the number of letters you are receiving, many people are finding this to be a very unnecessary project that is creating a major scar on Mount Helena. Also, people are feeling deceived because the project does not meet the specifications presented during the fall 2020 Parks Department major project proposal period. Specifically, an ADA trails should not have a 7% grade. What person in a wheelchair would be willing and able to maneuver such a trail? While it was stated the trail would have minimum impact, the outrage from the community suggests the impact is significant. The City Parks Department has failed to provide adequate oversight of this project. Someone should have realized the grade was too great and that the project does not follow the mapped lines of the original proposal. This should not have happened. The new process for approving major projects is apparently not working. If some HOLMAC members and some city staff continue to align with plans of the Montana Bicycle Guild (MBG) and the Tourism Business Improvement District to turn our open lands into a mountain biking mecca, poor decisions will continue to be made. As I communicated to you previously, we need HOLMAC members with resource management experience, not just people with an agenda to promote their personal interests. <b>Please reclaim all the damage done with this trail construction activity and re- open public discussion on this project.</b></p>	Please see response above.

SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

			<p>As you know, Tony Zammitt presented this proposal. He is former President of Montana Bicycle Guild and an avid mountain bike racer. While it is possible that this proposal was meant as an altruistic effort to create an environment that allowed people with mobility disabilities to recreate in our open space, the fact that he did not initially involve people with disabilities to be part of the process makes me question the intent. When we see what is proposed for Phase II, it certainly makes me wonder if there is an ulterior motive. Do the mountain bikers want to divert more slower trail users off the Powerline, 1906 Trail, and Prairie Trail? Do they think the new ADA trail will eventually be converted to a bike trail, with a new way to access the Whyte property? It is all unclear to me. <b>Please do not let Phase II move forward. There has not been a demonstration of need. There are too many unanswered questions. And this is a very major project with significant impact. We need much more public involvement and a professional environmental assessment by a neutral third party.</b></p> <p>Mr. Zammitt did a TED talk in 4/2018 and the link to it is attached: <a href="https://youtu.be/qEDryWC7uBE">https://youtu.be/qEDryWC7uBE</a> In this talk, he stated that the prior summer (summer 2017?) MBG was <b>approached by the City of Helena</b> asking them to propose building downhill mountain biking trails on the backside of Mount Ascension. As you know, they did build the Directional Trails Bike Park and it created significant division within the community. I want to know if his statement is true and, if it is, <b>who in the City of Helena approached MBG?</b> I suggest you seek out the answer to this question because it is essential the public knows what occurred. I suspect that behind-closed-doors discussions were taking place and that they are still occurring. More efforts need to be made to get a handle on this.</p>	
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			I appreciate the opportunity to express my concerns and hope you will quickly take action to stop this destruction of Mount Helena.	
09.28.2021	Tony Jewett	<a href="mailto:Tonyjewett1@gmail.com">Tonyjewett1@gmail.com</a>	<p>Hi Kristi -</p> <p>I am attaching a proposed Major Project that we sincerely hope is given strong consideration by the Department. We believe that a project along these lines would be enormously helpful for long term planning on trail maintenance, new trail construction, habitat and trail rehabilitation and open space conservation.</p> <p>Thank you for the opportunity to have this considered in your work plan for 2022. <b>(SEE ATTACHMENT "B")</b></p>	<p>Thank you for the time and efforts expended in developing a proposal to assist in the maintenance and management of Helena's open lands system trails, both designated and social. City staff recommend inclusion of Helena Hikes proposal into the draft list of projects with a clear understanding that the associated products list will be subject to city staff modification and/or addition over multi years as funding becomes available.</p>
09.28.2021	Angie Leprohon	<a href="mailto:angie@mt.net">angie@mt.net</a>	<p>I am writing to you to ask you to please stop construction of the "ADA compliant" trail on Mount Helena. This is not the proposal that the city presented to the public and city commission for approval in 2020 for the following reasons:</p> <ul style="list-style-type: none"> <li>• The current bulldozed trail does not follow the same route as the trail that was mapped out in the proposal.</li> <li>• The average slope of the trial is 7%, which does not follow ADA guidelines. The proposal to the city and commission stated that the grade would be less than 2%.</li> <li>• This project has not involved input from the disabilities community.</li> <li>• This project duplicates the existing ADA trail on LeGrande Cannon, which was developed with input from the disabilities community.</li> </ul> <p>Please stop construction on this trail immediately and let the Helena community be involved in the planning process.</p>	<p>Thank you for your comments. Trail work began in the spring of 2021 on the Mt Helena ADA Trail. The trail was one of seven projects approved through the Helena Open Lands Management Plan annual projects process. Work slowed during the summer of 2021 due to weather and limited availability of materials due to the COVID-19 pandemic. On September 27, 2021, work was stopped by the City Manager out of concern for worker safety. The two weeks of work remaining on the project are anticipated before snow arrives in Helena.</p> <p>During the September 29, 2021 Administrative Meeting, this project was used as an example of how to implement the Communications Plan and Engagement Program created for Helena. This project was chosen due to the timely presentation of the</p>

SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

				<p>first communications and engagement program alongside concern for changes in the project made during development.</p> <p>The project was proposed in 2019 by Helena Rotary who presented the concept to the Helena Open Lands Management Advisory Committee, City Staff, and the City's ADA Advisory Board. The project was then presented by Rotary at the 2020 Open Lands Major Projects Meeting and brought through the Open Lands Public Involvement Process that included comment periods and four public meetings before approval.</p> <p>The first goal in the City newly adopted <u>Helena Open lands Management Plan, Recreation Chapter</u> is to <i>provide safe and accessible recreational opportunities for all users</i>. With the Guiding principles to: <i>Ensure opportunities for all users to access; Maintain current levels of trail access and look for opportunities to expand access – in sections of existing trails as well as in new trail construction; Strive for a balance of providing multiple access points with concentrating access in specific areas to reduce public resource and user impacts; and Expand ADA access across the Helena open lands and meet ADA access requirements in all new infrastructure.</i></p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				<p>This ADA accessible trail project not only implements a goal of the plan, but it also fulfills a previous recreation objective in the Open Lands Plan. In the 2004 Helena Open Lands Management plan, a recreation plan objective was included a planned special trail within Mt Helena City Park accessible to people with disabilities, the elderly, and those seeking a less rigorous trail experience. Helena Open Lands currently has only one ADA accessible trail on the east side of town at the Golf Course.</p> <p>Comments and feedback on the currently under construction trail have been overwhelmingly supportive and complimentary of the project throughout the public process. In the last two weeks, when the City of Helena Parks Department and the Helena City Commission have received multiple emails of concerns with the project.</p> <p>There have been questions raised about the trail's ADA compliance. It is important to note that Federal ADA standards provide <u>guidelines</u> to help ensure the trail is more accessible to individuals with mobility limitations. This trail is being built with an overall grade of approximately 5-6%. The following ADA guidelines are used in developing the trail:              0-5% slopes for any distance</p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				<p>6-8% for 50 feet of run (with interrupted 5' resting sections)            9-10% slopes for 30 feet of run            11-14% slopes for 5 feet of run</p> <p>The completed trail will be roughly one-half mile in length. ADA guidelines recommend a <u>minimum</u> width of 36 inches to accommodate a single wheelchair. This trail is being developed at 60-80 inches, to allow two wheelchairs to pass at any point on the path. The current development does not represent the final width of the trail, as work will be done to narrow the trail as it is complete.</p> <p>The original proposal had a conceptual map presented by Helena Rotary that proposed a 2% slope goal. When construction began in the spring it was determined that the entirety of the proposed alignment would not be possible to maintain a 2% slope on that contour, nor would the terminus area be able to have an ADA accessible seating/viewing area. Minor modifications to the alignment of the trail have been made to reduce some slope/infrastructure needs, reduce the length of the trail, reduce the visual impacts, and modify the end point to avoid an area that was too rocky to develop. The Parks department consulted Rotary and informed the Parks Director who determined it was a</p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				<p>minor modification not requiring further approval based on the following factors:</p> <ul style="list-style-type: none"> <li>• Change in the purpose of the trail or project. <ul style="list-style-type: none"> <li>○ The purpose of the project is not changed. The purpose of the project, as proposed and built, is to provide recreation opportunities for individuals with limited mobility, who rely on wheelchairs, and for those who cannot ascend or descend the existing trails and expand access to Helena’s Open lands with opportunities that comply with the Americans with Disabilities Act.</li> </ul> </li> <li>• Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands. <ul style="list-style-type: none"> <li>○ The location of the project is not in a different drainage, draw, trailhead, or different area of open lands – part of the trail was realigned to an area above, on a different contour and to a modified terminus point due to physical challenges with rock.</li> </ul> </li> <li>• Changes to length of the trail more than one-half mile. <ul style="list-style-type: none"> <li>○ The length of the trail shortened approximately 0.10 miles.</li> </ul> </li> <li>• Changes that are not acceptable to the project proponent (if not the City). <ul style="list-style-type: none"> <li>○ Open Lands Manager consulted Rotary (project proponent) and they accepted</li> </ul> </li> </ul>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

				<p>the modification to the alignment of the trail.</p> <ul style="list-style-type: none"> <li>• Changes that negatively impact the environmental/wildlife/visual character of the trail or project.             <ul style="list-style-type: none"> <li>○ The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the trail – it is now less visible from any vantage point in town.</li> </ul> </li> <li>• Changes that increase the infrastructure impact/construction.             <ul style="list-style-type: none"> <li>○ The change does not increase infrastructure and decreases construction activities.</li> </ul> </li> <li>• Changes that increase the cost or duration of the construction of the project more than \$25,000 or more than one year.             <ul style="list-style-type: none"> <li>○ The change does not increase the cost or duration of the project.</li> </ul> </li> </ul> <p>The constructed route, with the minor modifications, was shared with HOLMAC at the June 2021 HOLMAC meeting which included a trail walk off with flags. The city posted social media updates as well as media updates on trail development.</p> <p>Trail work began in the spring but was slowed during the summer due to weather and limited availability of materials related to the impact of the COVID-19 pandemic. Work this</p>
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SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

				<p>fall has involved a skid steer and mini excavator, which has made development more visible in the last two weeks coinciding with the concerns raised in the community. Our team will address concerns about erosion and limit visible impact as much as possible when the trail is completed. Staff has been diligent in ensuring animal habitat has not been harmed during development.</p> <p>The Parks and Recreation Department recently shared a proposal, through the Helena Open Lands Major Projects Process, to extend the ADA trail to meet up with the LeGrande Cannon Trail—referred to as a second phase or Phase 2. The presentation of this second phase was <u>only a preliminary proposal</u> and there are currently no formal plans for additional development.</p> <p>The City Commission established its policies for Helena’s open land as describe as the Vision and Goals in lands the Open Lands Major Projects Plan, Chapter 7-Recreation Plan. Additionally, the Public Involvement Process in of this Plan is outlined in Appendix P. During the September 29, 2021 Administrative Meeting, this project was used as an example of how to implement the newly created Communications Plan and Engagement Program for Helena. This project was chosen due to the timely presentation of the first communications and engagement program.</p>
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

09.28.2021	Terry McLaurin	<a href="mailto:terrymaclaurin@gmail.com">terrymaclaurin@gmail.com</a>	<p>Dear Mayor, Commissioners, City Manager, and Department of Parks &amp; Recreation,</p> <p>I am writing to voice my concern on the creation of the new "ADA trail" on Mt. Helena. First of all, the project completed to date is not the proposal the city presented to the public and commission for their approval back in 2020. The bulldozed trail does not follow the mapped line, the average slope of the bulldozed trail is 7%, and the elevation gain of the new trail is 160 feet.</p> <p>Secondly, the City Parks and Recreation Staff have not been able to document any direct outreach to the disabilities community about its support for, or involvement with, the development of this proposal.</p> <p>Thirdly, the original "trail" was to be about 1/2 mile. The plan being followed currently is for a trail that will be about 4 miles long and traverse the full northern face of Mt. Helena.</p> <p>I am asking you to please stop all activity on the current Phase I bulldozed trail, reclaim the damaged area, and reopen public discussion on the project. Please permanently shelve Phase II of the proposal.</p> <p>Thank you for your consideration</p>	Please see response above.
09.29.2021	Dick Thweatt	<a href="mailto:dickthweatt@gmail.com">dickthweatt@gmail.com</a>	<p>Dear Mayor, Commission, Manager, and Director:</p> <p>I'm very upset about the trail intended for disabled people under construction on Mount Helena. I was initially, reluctantly, willing to accept the disturbance when I learned that it was intended for disabled people so that they could experience some of the same access to nature that I enjoy. But as has been pointed out, the route is too steep for disabled people and constitutes severe and unnecessary destruction of the natural values which most of us cherish for which that park exists. A</p>	Please see response above.

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>better route could have been selected. There are flat trails at Ten Mile park, and a non-motorized path along La Grande Boulevard.</p> <p>To continue construction along the Ambrose Trail would create even more destruction, including crossing a deep draw. Some of the disturbance would be visible from town. People will be angry when they see more scarring of their mountain.</p> <p>So I ask you to please <b>stop the construction immediately</b> and reclaim this scar on our beloved municipal mountain.</p>	
09.28.2021	Lisa Bay Norane Friestadt	<a href="mailto:lisamaebay@gmail.com">lisamaebay@gmail.com</a>	<p>Memorandum: Minority Report from the Davis/DeFord Working Group          To: Kristi Ponzoso, Brad Langsather, Karen Reese, Lindsey Gilstrap, Matt Culpo, Chase Peasley, Ellie Ray, Byron DeFord, Joel Peden, Charles Alvarez          From: Lisa Bay and Norane Friestadt          Date: May 19, 2021</p> <p>Norane Freistadt and Lisa Bay served on the DeFord Working Group, primarily advocating for the interests and concerns of pedestrians of all ages and abilities, as well as mobility/sensory-challenged individuals on the DeFord Trail/Davis Gulch improvement proposal. We prepared this minority report because we did not agree with the consensus decision to designate the DeFord Trail as a Shared Use Path for its entire length, as explained below. The Working Group agreed that a minority report was appropriate to accompany the Group’s consensus document.</p> <p>Currently, there are no specific Americans with Disabilities Act (ADA) standards for trails on open lands regulated by local governments. Current ADA requirements for local governments apply to bathrooms, parking facilities, and “accessible routes” that connect accessible facilities to one another (e.g., bathroom to parking spot).</p>	Thank you for your comments.

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>The need for consistent guidelines relevant to trails, paths, and accessibility routes prompted a consortium of trail managers from various local, state, federal and land trust agencies to collaborate in the development of guidelines/standards and Best Management Practices (BMPs). These Universal Access (UA) guidelines and standards are now contained in Universal Access Trails and Shared Use Paths (Pennsylvania Land Trust Association, 2014), and in Outdoor Developed Areas: A Summary of Accessibility Standards for Federal Outdoor Developed Areas (U.S. Access Board, 2014).</p> <p>UA guidelines define a “Trail” as “A route designed, designated, or constructed for recreational pedestrian use,” also known as a hiking trail. This definition fits the narrow meaning of “Trail” for federal regulatory purposes, as opposed to a “Shared-Use Path,” most often designed for combined uses, such as bicycles and pedestrians. These two definitions—Trail and Shared-Use Path—are considered different from one another from a regulatory, user, and construction perspective, and in the context of the proposal for a UA Trail on DeFord, submitted to the City in 2020. The purpose of the proposed UA Trail on a portion of the DeFord Trail continues to be to meet the needs of pedestrians, along with the mobility/sensory-impaired and other slower users, safely and comfortably. The proposal attempts to accommodate current use, as well anticipated growth in trail use on Helena’s Open Lands.</p> <p>The reason for our participation on the Working Group was to advocate for pedestrians and the mobility/sensory-impaired community. Please note the affiliations of each individual who participated in the Working Group; however, in addition, two members of the mobility/sensory-impaired community attended site visits and engaged in group conversations: Joel Peden and Charles Alvarez from Montana Independent Living Project. They requested to be included in the Working Group after the first site visit (second Working Group meeting), but were told it was too late for their inclusion. To our knowledge, no</p>	
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>one else in the Working Group besides Lisa and Norane reached out to the disabled community.</p> <p>On April 22, Norane and Lisa met with Joel and Charles to determine their concerns and desires for the proposed Universal Access improvements (meeting notes attached). Joel and Charles offered several suggestions that would improve the City’s proposal from their perspective: designating the upper 1,600 feet of DeFord trail from the Archery Range parking lot to the southern terminus of the trail at Dry Gulch as a UA Trail (not a Shared Use Path); including an electric wheelchair charger and solar charging station at the Old Shooting Range (OSR) parking lot (in addition to the planned ADA-compliant restroom facilities and parking spots at the OSR proposed by the City), and adding ADA-compliant parking near the Archery Range. City staff identified an ADA parking option at the current Archery Range parking lot, and we support the inclusion of this idea. Mobility/sensory-impaired representatives endorse the above adjustments to the consensus recommendation for reasons of safety and quality-of-experience.</p> <p>We were pleased that several points of consensus were reached by the Working Group that will benefit all members of the Helena recreational community, including mitigations to trail damage along the DeFord Trail, appropriate signing and fencing along the proposed bike skills course, and a northbound directional trail to help divert bike traffic off the DeFord Trail.</p> <p>We were disappointed, however, that there was so little willingness to provide the desired outcome of a Universal Access Trail to a user-group that has so few similar options. Designating 1,600 feet for a UA Trail on a 75-mile system seems like so little to ask. In a commitment to the safety of all users, we believe the City is capable of designating a short bike lane along upper Davis Gulch for use as a return trail for the upper DeFord</p>	
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>bike skills course. This will better assure the safety of all user groups on upper DeFord.</p> <p>Of further note, the vast majority of safety discussion, aside from our advocacy, was about how to keep bike users safe—no one else on the committee addressed the concern for pedestrian/Universal Access safety, even though the City proposes to funnel as much bike traffic as possible from Davis Gulch Road onto DeFord Trail under the Working Group’s recommended Shared Use Path scenario.</p> <p>Additionally, the Working Group exercise, though successful in part, felt largely predetermined by the City. At the same time the City had appointed a Working Group to craft recommendations to solve problems in this travel and recreation corridor, it had already engaged an engineering firm to prepare a federal grant application with specific attributes for Davis/DeFord improvements, including informing the engineers that it was the City’s intent to divert as much bike traffic as possible onto DeFord and off of Davis for bike safety, and specifying the surface materials for use on an improved DeFord Trail.</p> <p>In that regard, we have advocated for the consideration of a more stable, durable material on the DeFord Trail than decomposed granite, because of the universal access component and the questionable efficacy of using decomposed granite on steep slopes in some areas. On a recent site visit, some City staff and trail design experts we spoke with questioned whether decomposed granite would withstand high use and precipitation events on some of the steeper trail grades. The City has rejected consideration of the alternative material we suggested (StaLok), on the basis of cost alone. On each site visit, it was our impression that the City’s plans were a foregone conclusion, supporting the bike community’s needs and that there was no intention of changing any fundamental aspect of a pre-determined Davis/DeFord scenario.</p>	
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>We also question whether the City and the Working Group are truly taking the future safety of all users into account with the City’s current proposals. While there are no recent use data, we would agree that use of the DeFord/Davis corridor has increased dramatically over the past five years for both hikers and bikers.</p> <p>Mountain bike users are proposing, and the City is supporting, an additional 30+ miles of mountain bike trails on public lands to the south of the Davis/DeFord corridor. The travel corridor into town from these proposed trails would be via Davis/DeFord. Additional private land is likely to be developed to the south as well. We have seen no evidence that the City has taken into account, or made demonstrable commitment to, the safety of pedestrians in its plans for the Davis/DeFord corridor. We would also note that Helena’s 75-mile open space trail system has not a single Universal Access Trail (as defined by the ADA) that allows only pedestrians and mobility/sensory-impaired individuals. Yet we have two dedicated bicycle-only skills courses and a third proposed along DeFord on our Open Lands.</p> <p>As a point of historical comment, the DeFord trail was originally planned as an “ADA compliant trail” some 20 years ago. Unfortunately, those plans were not fulfilled when the construction was completed by the City, leaving steep sections that would be impossible to navigate for many in the disabled community. In addition, there were and still are areas of the northern portion of the trail with such rough surfacing that the trail is very difficult footing for some pedestrians. Fast forward to the present and the DeFord Trail has become a much more popular trail, seeing heavy pedestrian and bike traffic as a major connector to many other trails in the South Hills trail system. It cannot be overstated that we now have the opportunity to set aside a modest 1,600-foot portion of the southern DeFord Trail as a Universal Access Trail that would serve the mobility/sensory-impaired community and truly be a quiet and safe trail experience for a wide range of people.</p>	
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>Personal note per Norane: As the mother of a grown woman with cerebral palsy and the associated startle reflex that is common in mobility-impaired individuals, please be aware of the mobility/sensory-impaired challenges that many others like her experience on a daily basis. We tried our best to include her in our outdoor adventures, and while walking with a crutch is a challenge on any trail, more challenging is the tendency to be easily startled when bicycle traffic comes up from behind. It brought to mind Charles Alvarez’s comment about people (and especially veterans) with post- traumatic stress and their need for a quiet, safe trail experience, as well as the community of aging citizens recovering from surgery, strokes and other aging issues in general.</p> <p>In summary, at the closure of the Working Group’s last meeting, all members expressed support for the “idea” of a Universal Access Trail as part of our Helena Open Lands system, but not on the DeFord Trail. We have the opportunity to make this a reality now, not at some unidentified moment in the future. It makes sense to do it now, at DeFord, especially since the City is already making a large investment to install ADA-compliant parking and restroom facilities. We strongly advocate now for this opportunity that would serve as a model project providing for the true diversity of people in our community, under safe and enjoyable circumstances.</p>	
<b>COMMENTS RECEIVED AFTER 09.30.2021</b>				
10.04.2021	Hugh Zackheim	<a href="mailto:montanazac@mac.com">montanazac@mac.com</a>	<p>Mayor Collins, Members of the Helena City Commission and City Manager Schalk:</p> <p>The new trail now being constructed on Mt. Helena is not what was reviewed and approved through the city’s public process. Rather, there have been major changes in location, slope, contour and length — the very factors that define a trail project. As it’s being constructed, this is a major bulldozed 7-foot-wide construction project that is simply not</p>	



**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>compatible with the public presentation of the trail to be developed on the mountain.</p> <p>For city staff to call these changes minor or insignificant is both disingenuous and an insult to the scores of Helena citizens who conscientiously participate in the decision-making process for Helena’s open lands and trails. Citizen volunteers/trail advocates have been instrumental in conserving Helena’s open space and developing a trail system that our community is proud of. For them now be put in the role of spoilers — simply because they are standing up to this misguided project management — is a serious breach of the positive participatory governance on which our community prides itself.</p> <p>Work on the new trail should be suspended indefinitely until the issues can be resolved by carefully considering what, in fact, was approved and how that original vision can be achieved without compromising the natural values of Mt Helena and its existing trail system.</p> <p>Thanks for your consideration of this important community issue.</p>	
10.04.2021	Bradly Maddox	<a href="mailto:bradly.maddock@gmail.com">bradly.maddock@gmail.com</a>	<p>Hi ParksAndRec!</p> <p>I apologize for not sending in comments during the 15 day comment period.</p> <p>I support both the ADA Mt. Helena trail and the DeFord ADA trail and bike decent trail project. I'm sorry there is so much backlash about the Mt. Helena ADA project in the community. I think the ADA mount Helena project is a great thing for the community, not only those in wheelchairs but the elderly and small children as well.</p> <p>I would like to propose that the Section of the DeFord project between the Archery Range Driveway and Davis Gulch to the North (currently the</p>	

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>area with the dirt jumps) be highly considered for a dual slalom course. Dual slalom course <a href="#">definition here</a>. I think it is an excellent location for a course like this and would be a fun way for Helenan's to end their ride down Davis gulch as many Helenan's often do. An example of a project like this is at the Duthie Hills Bike Park in Washington. The course there is about 2000 feet long with a vertical drop of only 65 feet <a href="https://www.trailforks.com/trails/deuces-wild-33570/">https://www.trailforks.com/trails/deuces-wild-33570/</a>. The section I am proposing this course be created would be about 70 feet of drop over around 1750 feet of distance which is very comparable to the course at the Duthie Hills Park. This option would satisfy a mountain bike descent trail that is rideable by all, while also including some fun berms and jumps that could be attempted by some, by easily rolled over by less experienced riders. At the same time I recommend this, I also am aware that the large dirt jumps currently in the gulch get used by many riders and I advocate for both to be present in the gulch. I think a well-designed bike zone could include both a dual slalom as well as a jump line for riders seeking some extra air time. If large dirt jumps are a part of the gulch, I advocate for the professional building of the dirt jumps as many of them do not have friendly take offs and landings like some professionally built jumps do.</p> <p>Please feel free to contact me with any questions and thanks for all of your hard work making Helena an awesome place to live!</p>	
10.04.2021	Margaret Regan	<a href="mailto:mregan@mt.net">mregan@mt.net</a>	<p>I am concerned about the new ADA trail begin constructed on Mount Helena. The current trail being built is not what was proposed. The changes are not minor.</p> <p>The difference between the 2% grade that was proposed and the 7% grade being constructed is tremendous. I am including some links to put the new 7% grade in perspective.</p> <p>Beartooth Highway - 6% grade for the 6 mile steep switchback section <a href="https://urldefense.proofpoint.com/v2/url?u=https-">https://urldefense.proofpoint.com/v2/url?u=https-</a></p>	

SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)

			<p><a href="https://www.bigskyfishing.com/scenic-2Ddrives_beartooth-2Dhighway-2D2.php&amp;d=DwIDaQ&amp;c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&amp;r=PK-tXBCacywIAJ-SjC4MHexbGZWuGaYxvpEf2ZJAKWQ&amp;m=da9iHPL7ORtvCDGas241Vs5z9iyReaZOIQ17Y94i6fc&amp;s=3cb4lwe6CrKKXtGlt4zwZZNJTCpNItKd9BQKh-FkSWg&amp;e=">3A www.bigskyfishing.com scenic-2Ddrives_beartooth-2Dhighway-2D2.php&amp;d=DwIDaQ&amp;c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&amp;r=PK-tXBCacywIAJ-SjC4MHexbGZWuGaYxvpEf2ZJAKWQ&amp;m=da9iHPL7ORtvCDGas241Vs5z9iyReaZOIQ17Y94i6fc&amp;s=3cb4lwe6CrKKXtGlt4zwZZNJTCpNItKd9BQKh-FkSWg&amp;e=</a></p> <p>Going to the Sun Highway - 6% grade between the Loop and Logan Pass  <a href="https://urldefense.proofpoint.com/v2/url?u=https-3A_www.nps.gov_glac_learn_news_upload_Going-2Dto-2Dthe-2DSun-2DRoad-2DAn-2DEngineering-2DFeat.pdf&amp;d=DwIDaQ&amp;c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&amp;r=PK-tXBCacywIAJ-SjC4MHexbGZWuGaYxvpEf2ZJAKWQ&amp;m=da9iHPL7ORtvCDGas241Vs5z9iyReaZOIQ17Y94i6fc&amp;s=ift_usdpTJs15vysTi6Qrv3thlvdv9oCXU7bV6lxsFU&amp;e">https://urldefense.proofpoint.com/v2/url?u=https-3A_www.nps.gov_glac_learn_news_upload_Going-2Dto-2Dthe-2DSun-2DRoad-2DAn-2DEngineering-2DFeat.pdf&amp;d=DwIDaQ&amp;c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&amp;r=PK-tXBCacywIAJ-SjC4MHexbGZWuGaYxvpEf2ZJAKWQ&amp;m=da9iHPL7ORtvCDGas241Vs5z9iyReaZOIQ17Y94i6fc&amp;s=ift_usdpTJs15vysTi6Qrv3thlvdv9oCXU7bV6lxsFU&amp;e</a></p> <p>CURRENT TRAIL - 7% grade</p> <p>MacDonald Pass - 8% grade  Trucks warned "Steep grade / 25 mph speed is recommended"</p> <p>The ADA standard for 1:12 slope (1 unit of rise for 12 units of run) calculates out to a 8.3% grade. But that is the maximum used for ramps, just to get into and out of buildings. A trail with a 7% grade would be very challenging. It is too steep.</p> <p>The current construction should not be resumed, but rather undone to the extent possible. There should be public discussion on the project. Phase II should be dropped.</p>	
10.06.2021	Luke Osborne	<a href="mailto:luke.osborne99@gmail.com">luke.osborne99@gmail.com</a>	<p>Dear Kristi and Parks and Rec Dept:</p> <p>Please accept my comments on the Mount Helena ADA Trail projects:</p>	

**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>I am in support of the Phase I Trail, I think it will offer a good option for many. I have been on the trail though and wonder if it will meet ADA specification or is the trail being designed to another standard like "All-Abilities" type trail?</p> <p>I have some concerns and questions with the proposed Phase II trail:</p> <ol style="list-style-type: none"> <li>1. What are the project objectives of the Phase II trail? (e.g. what will the trail accomplish? what need will it meet? what benefit will it provide?)</li> <li>2. Does the City have trail user data to support creation of the Phase II trail? What user data does the City have for other accessible trails like LeGrande Cannon, Ten Mile Park?</li> <li>3. Have alternative alignments/locations/options been considered? For example, I would think creating an ADA connector from the end of the LeGrande sidewalk through the dirt (drivable) portion of LeGrande to the trail behind the gate would be a higher priority than the proposed Phase II. What other locations have been considered?</li> <li>4. Will the Phase II trail be an entirely new alignment that will leave the existing Ambrose trail in place or will the existing Ambrose Trail be obliterated? As a NICA mountain bike coach for our local team, I would be disheartened by the loss of the existing Ambrose Trail. In addition to being a very well built (and fun) trail, it is the only contour trail on Mount Helena with moderate grades with small to moderate obstacles that beginner riders (both kids and adults) need to challenge and grow their riding skills. A moderate trail like this is needed so riders can progress to the more challenging trails on Mount Helena and elsewhere on the system. If Phase II will remove the existing Ambrose Trail will the loss be mitigated through construction of another similar trail built on Mount Helena?</li> <li>5. I am very familiar with the terrain of the proposed Phase II trail and it would seem that construction of an ADA trail would present a</li> </ol>	
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**SEPTEMBER 14 - 30, 2021 LISTENING SESSION COMMENTS (Comments received after 09.30.2021)**

			<p>number of construction challenges to maintain proper grade and width requirements. Has the City conducted a feasibility study of construction of the trail? What is the estimated cost to construct the trail?</p> <p>6. The proposed alignment of the trail appears to cross moderately steep and open terrain that will require a large cut into the hillside for ADA width requirements. Does the City have engineering plans or drawings to show how much excavation and fill will be required? Has the City considered the potential visual impacts of the trail? I would imagine the trail would have a significant visual impact to the front of Mount Helena, looking more like a road than a trail.</p> <p>In summary, the cost of the Phase II trail to our community (monetary, visual, user experience) seems high and the benefits are not clear or have not been communicated. Before forging into construction of Phase II I urge the City to study the potential impacts and weigh the costs and benefits of the trail and communicate those with the community so we can weigh in.</p>	
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## **Alternative Proposal to the City's 2021 DeFord Improvement Project**

**Date: September 23, 2021**

**By: Joel Peden on behalf of the disability community**

On behalf of the Montana Independent Living Project, and for citizens of the Helena area with mobility/sensory challenges needing and desiring a safe and enjoyable experience, I am submitting the following alternative to the City's 2021 DeFord Improvement Project for consideration by HOLMAC and the City of Helena:

### **Upper DeFord trail (South of the Old Shooting Range parking lot) •**

1. Designate the upper 1,600± feet (approximately 1/3 mile) of the DeFord Trail, from the Archery Range parking lot to the southern terminus of the trail at Dry Gulch, as a Universal Access Trail consistent with Universal Access guidelines. This would become: *"A route designed, designated, and constructed for recreational pedestrian use"* and open to pedestrians and mobility/sensory-challenged individuals—a slower-user trail.

2. Improve this segment of the DeFord Trail to standards and guidelines consistent with a Universal Access Trail, including:

The U.S. Access Board's manual recommends that non-federal agencies use Chapter 1017's best management practices (BMPs) for designing and maintaining UA Trails, including the following sustainable trail design principles:

- Paths that traverse along the side slope
- Sustainable grades
- Erosion resistance
- Out-sloped tread
- Positive user experience
- Low maintenance needs

Technical Specifications:

- Tread surface that is clear, firm, and stable with a minimum width of 36" (5-ft min. proposed)
- Tread obstacles of 2" high
- Cross slopes 5% max
- No more than 30% of the total trail length exceeding a running grade of 8.33% (with other specs, including resting intervals if necessary)
- Passing spaces of 60" wide at suggested intervals
- Signage outlining trail specifications

Additional Specifications:

- Requirement that dogs be leashed for purposes of user safety
- At least two turnout spaces with benches for rest and enjoyment along the trail

3. Designate and sign a bicycle lane on Davis/Dry Gulch Roads, between the Old Shooting Range parking lot and the entry of the Upper DeFord bike skills course, to route bike traffic off the UA Trail for this short distance.
4. Provide ADA-compliant parking at the Archery Range parking lot.
5. Provide an electric wheel-chair charger and solar charging station at the Old Shooting range parking lot, alongside the City's proposed ADA-compliant improvements.

**Justification for this alternative:**

Helena's 75-mile trail system has extensive opportunities for both hikers and bicyclists; however, there currently exists not one trail on our Helena Open Lands built consistent with Universal Access standards, standards we rely on for safety and quality-of-experience.

Members of the disability community were active within the DeFord Working Group, attending four out of five of the meetings. There was no outreach on behalf of the City to include individuals from this community in the discussions, and when we requested to be included on the working group at the second meeting, we were told that wasn't possible.

The ability to enjoy the outdoors must be shared by all. For someone with a mobility disability, a mental health disability, dementia and other sensory disabilities, sharing a trail with bicycles can lead to traumatic experiences. The compromise which was put forward during the working group sessions was completely shut down. I find it difficult to understand how asking for a small portion of the DeFord trail upgrade to be set aside for pedestrian traffic only is so controversial. The Working Group said it was in favor of the idea of a Universal Access trail, just not at this location. Frankly, there simply is not another location we can identify that is as level and accessible, and also provides an equally attractive natural setting and experience, as the DeFord Trail.

# CITY OF HELENA OPEN LANDS SYSTEM MAJOR PROJECT

Submitted by Tony Jewett, Helena Hikes

## **Project Summary:**

This Major Project seeks to build from the trail information foundation produced by the Prickly Pear Land Trust (PPLT) in their 2020 Helena Open Lands Trail Inspection Report ('Report'). This Report by PPLT provided a summary review and assessment of trail conditions within the HOL trail complex.

We propose an expansion of this foundational effort that: a) provides a more detailed and comprehensive trail condition information base and data-driven assessment, b) utilizes this expanded information base to establish a predictable and targeted framework for the city and general public to scrutinize trail system needs and to set annual work plan and budget priorities that emphasize the city's HOL conservation mandate, and 3) expands and provides stable permanency to a trail etiquette program that builds a culture of respect among diverse trail users and broad literacy about trail rules. These products would provide much needed information that would increase the life of our trails, help with on-going safety issues, build rapport and cooperation among diverse user groups, and help protect the natural resources for which our HOL lands have been set aside.

This project would include, among other associated products:

- a) an assessment and measurement of the growth and expansion of the HOL trail system over the past decade or more – a baseline for looking ahead
- b) a compilation of the miles of approved system trails and of non-approved, non-system trails (also termed 'social trails')
- c) specific measurements of factors related to trail condition to include trail width vs. target, trail grade/slope against desirable conditions, cost of annual maintenance needs, cross-slope range, potential for erosion, and other associated factors considered central to rehabilitation and construction of stable trail design.
- d) an inventory of deferred maintenance needs, prioritized and monetarily assessed, to serve as a roadmap for annual work
- e) a prioritized listing of non-system, illegally created trails that should be removed and rehabbed
- f) a listing of existing system trails and the work needed to bring segments of those trail into structural compliance with adopted trail stability standards set by the city
- g) the establishment of a permanent and greatly expanded signage system and public education program that focuses on proper user etiquette and trail rules and that seeks to establish commonality of behavior and commitment to our trail system among all users.



**Project Need:**

Currently our trail system on HOL is an increasing spider web of miles of approved system trails and non-system, illegally-created trails. There is no true, accurate baseline of the growth rate of the trail system over the past decade or more, or whether that expansion is necessary, problematic or a part of a longer and larger vision established by those who are the stewards of this area. The current base of understanding is in need of greater detail and a deeper look, and then a discussion among city managers and the public needs to establish a framework for the future that answers pressing questions, such as: a) how to establish annual budget to reach a proper balance of conservation and recreation, b) how do we invest in a trail system that lasts, that is stable and that is safe, c) how do we build public awareness of behavioral rules and expectations for various users.

Without answers to these and a number of other core questions, city decisions on appropriate budgeting, new major project proposals, and general but essential maintenance needs will be, 1) ungoverned by a framework that should be based on need and 2) without a broad foundation of information that provides a basis for informed public input and overall project priority setting.

Over the annual work plan cycle of 2021 the city's Department of Parks and Recreation has largely chosen to do projects that are expansion and 'infrastructure based' as opposed to maintenance and rehabilitation of the existing trail system and conservation of the associated landscape. This is evidenced by projects such as Deford Trail, the Mt Helena ADA trail construction, and new parking areas and area improvements on Lime Kiln and the Archery Range. This inclination to 'build out' rather than maintain and rehab what is currently in place continues into 2022 as the city offers up two new major projects to finalize the construction related to Deford and extend the Mt Helena trail across the face of hill.

In the 2020 adopted re-write of section 7 of the Helena Open Lands Management Plan under Goal 2 "Stewardship", it is stated: "Using stewardship as the guiding principle, manage Helena's Open Lands to balance environment and recreational use" and "Stewardship is the guiding principle that informs our decisions and actions".

Our proposal here is a request to the city to reframe its priorities and begin to create a roadmap that invests in trail maintenance, management strategies, trail upgrades, user information and etiquette, and a structured, long term plan that de-emphasizes unnecessary trail and infrastructure expansion and establishes clear goals and directions around balancing recreation and conservation in its chosen projects.

**Project Budget:**

This project, if adopted, would require the city to invest funds into its completion. The city Department of Parks and Recreation has demonstrated an ability to raise funds from independent sources in recent years for special projects and can look to similar strategies to augment funds from its core budget. As an example, the Narrate

Church supplied funding for the Directional Trail and was most recently mentioned as a possible source of funds for a lengthy trail project on the face of Mt Helena for 2022. The Department should consider re-routing this 2022 ask of the Narrate Church and provide funds instead for this proposed project.

**Partnerships:**

This project could also benefit by building upon existing partnerships such as that with PPLT and the USFS to assist with its assessment and inventory and facilitate a roll-out of identified maintenance needs and other core products of the project.

**Precedent**

The Department of Parks and Recreation has shown an interest in similar projects as noted by its recognition of the value of the PPLT Major Project proposed for 2022 dealing with the Whyte property. This proposal appears at initial glance in some ways to be a limited microcosm of the larger project we are proposing. Regardless of any possible detailed alignment, what is the case is that the Whyte property/PPLT project seeks to do a landscape assessment of a defined area of open space lands. The Whyte property project would establish a prioritized management plan complete with removal of some non-system trails, rehabilitation of system trails, budgeting for these actions, and associated projects to re-create the current on-the-ground situation.

**Project Qualifications**

This proposal meets several Major Project standards established in the city's adopted definition of Major and Minor projects. It is a proposal that has been raised in the past during the formulation of the 2021 annual work plan as diverse user groups expressed and advocated for just such a comprehensive look at the systems make-up, management, and future layout and conservation. As such it qualifies as a project of 'significant public interest'.

As previously discussed here , the interest of PPLT, in discussion with the city, to create a master plan for the future of the Whyte property -- which includes new trails, obliteration of existing trails, rehabilitation of existing trails, removal of non-system user created trails, and re-routing of existing trails, points to the city's acknowledgment of the importance of such futuristic planning as well as the embracing by PPLT – Helena's premier non-profit focused on open space lands, of the need and wisdom of large scale landscape planning and management as it applies to Helena's HOL.

This proposal, once a draft budget is formulated, will undoubtedly surpass the \$25,000 threshold set for consideration as a Major Project.