Date	Submitter	Email Address	COMMENTS	CITY RESPONSES/RECOMMENDATIONS
Submitted				
09.14.2021	Brittany Lee	britncady@aol.com	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.	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: https://helena.novusagenda.com/agendapublic/CoverSheet.aspx?ltemID=5745&MeetingID=429
09.15.2021	Joe and Laurie Lamson	joelamson49@icloud.com	Friends,	Thank you for your comments.
			We were unable to attend the session but would like to offer the following suggestions.	E-bikes are being contemplated as a larger, City-wide process. Please see The process of the process
			1) Continue the existing motorized travel ban on our trail system. E-bikes use a motor. They are motorized.	more information here: https://beheardhelena.com/e-bikes-scooters
			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.	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:
			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.	https://helena.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=5745&MeetingID=429
			On the trail it is remains the owner's responsibility to control their dog. That can be done through a variety of methods.	
			The key is trail curtesy. So regardless of how you are enjoying our trails be considerate of others.	

			Thanks for all your good work.	
09.18.2021	Jeff Sherlock	mookster007@gmail.com	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. 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. This reminds me of the old saying: we have met the enemy and it is us.	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.
			Thanks for listening.	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. 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

T	Г	
		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.
		The first goal in the City newly
		adopted Helena Open lands Management
		Plan, Recreation Chapter is to 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.
		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
	<u> </u>	those seeming a less rigorous train

	experience. Helena Open Lands currently has only one ADA accessible trail on the east side of town at the Golf Course. 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. There have been questions raised about the trail's ADA compliance. It is important to note that Federal ADA standards provide guidelines 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
	received multiple emails of concerns with
	· ·
	note that Federal ADA standards
	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
	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
	The completed trail will be roughly one-half
	mile in length. ADA guidelines recommend
	a minimum width of 36 inches to

	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.
	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:
	Change in the purpose of the trail or
	project.
	 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

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. Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands. The location of the project is not in a different drainage, draw, trailhead, or different area of open lands. 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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmentally wildlife Adjust of the tention of the trail. Changes that negatively impact the environmentally wildlife and positively impact to the environment or wildlife and positively impact to the environment or wildlife and positively impact to the		
existing trails and expand access to Helena's Open lands with opportunities that comply with the Americans with Disabilities Act. • Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands. • The location of the project is not in a different drainage, draw, trailhead, or different area of open lands. • 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. • Changes to length of the trail shortened approximately 0.10 miles. • The length of the trail shortened approximately 0.10 miles. • Changes that are not acceptable to the project proponent (if not the City). • Open Lands Manager consulted Rotary (orpicet proponent) and they accepted the modification to the alignment of the trail. • Changes that negatively impact the environmental/wildlife/visual character of the trail or project. • The changes do not negatively impact the environmental/wildlife/and positively impact to the environment or wildlife and positively impact to the environment or wildlife and positively impact to the		rely on wheelchairs, and for those
Helena's Open lands with opportunities that comply with the Americans with Disabilities Act. • Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands. • The location of the project is not in a different area of open lands. • The location of the project is not in a 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. • Changes to length of the trail more than one-half mile. • The length of the trail shortened approximately 0.10 miles. • Changes that are not acceptable to the project proponent (if not the City). • Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. • Changes that negatively impact the environmental/windlife/visual character of the trail or project. • The changes do not negatively impact the environmental/windlife/visual character of the trail or project. • The changes do not negatively impact the environmental vindlife and positively impact visual impacts of the		
opportunities that comply with the Americans with Disabilities Act. • Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands. • The location of the project is not in a different drainage, draw, trailhead, or different area of open lands. • 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. • Changes to length of the trail more than one-half mile. • The length of the trail shortened approximately 0.10 miles. • Changes that are not acceptable to the project proponent (if not the City). • Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. • Changes that are not acceptable to the project proponent and they accepted the modification to the alignment of the trail.		
Americans with Disabilities Act. Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands. 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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent; (if not the City). Open Lands Manager consulted Rotary fproject proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		Helena's Open lands with
Change in location of the project such as a different drainage or draw, different trailhead, or different area of open lands. The location of the project is not in a different area of open lands. The location of the project is not in a 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. Changes to length of the trail more than one-half mile. The length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environmental wildlife and positively impact visual impacts of the		opportunities that comply with the
a different drainage or draw, different trailhead, or different area of open lands. 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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environmental/wildlife/suildlife and positively impact visual impacts of the		Americans with Disabilities Act.
trailhead, or different area of open lands. The location of the project is not in a different drainage, draw, trailhead, or 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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/sixsal character of the trail or project. The changes do not negatively impact the environmental/wildlife and positively impact visual impacts of the		Change in location of the project such as:
trailhead, or different area of open lands. The location of the project is not in a different drainage, draw, trailhead, or 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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/sixsal character of the trail or project. The changes do not negatively impact the environmental/wildlife and positively impact visual impacts of the		a different drainage or draw, different
lands. The location of the project is not in a different drainage, draw, trailhead, or 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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact to the environment or wildlife and positively impact to the environment or wildlife and		
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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		·
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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that are not acceptable to the project proponent and they accepted the modification to the alignment of the trail. The changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		 The location of the project is not in a
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. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that are not acceptable to the project proponent and they accepted the modification to the alignment of the trail. The changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
the trail was realigned to an area above, on a different contour and to a modified terminus point due to physical challenges with rock. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
above, on a different contour and to a modified terminus point due to physical challenges with rock. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		the trail was realigned to an area
modified terminus point due to physical challenges with rock. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail on to not negatively impact the environment or wildlife and positively impact visual impacts of the		
physical challenges with rock. Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
Changes to length of the trail more than one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		·
one-half mile. The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
 The length of the trail shortened approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the 		
approximately 0.10 miles. Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
 Changes that are not acceptable to the project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the 		
project proponent (if not the City). Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
 Open Lands Manager consulted Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the 		
Rotary (project proponent) and they accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
accepted the modification to the alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
alignment of the trail. Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
 Changes that negatively impact the environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the 		· ·
environmental/wildlife/visual character of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
of the trail or project. The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the		
 The changes do not negatively impact the environment or wildlife and positively impact visual impacts of the 		
the environment or wildlife and positively impact visual impacts of the		· ·
positively impact visual impacts of the		
Sentember 1/2 2021 Listening Session Comments - City Pesnonses / Pesnomendations - Page 6 101		

	trail – it is now less visible from any
	vantage point in town.
	Changes that increase the infrastructure
	impact/construction.
	o The change does not increase
	infrastructure and decreases
	construction activities.
	Changes that increase the cost or
	duration of the construction of the
	project more than \$25,000 or more than
	one year.
	o The change does not increase the
	cost or duration of the project.
	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.
	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
<u> </u>	Sompleton and Seen amount in

				ensuring animal habitat has not been harmed during development.
				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 only a preliminary proposal 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
09.21.2021	Kevin Eden	kveden@gmail.com	Dear all, On April 3, 2019 it was our great pleasure to send an email	and engagement program. Please see response above.
	Liz Eden	k.eden@bresnan.net	informing each of you that 90 ac on the west flank of Mt Helena had been purchased. In the 2 &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.	

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: (mayorandcommission@helenamt.gov<mailto:mayorandcommission@h elenamt.gov>), to City Manager Rachel Harlow-Schalk (rschalk@helenamt.gov<mailto:rschalk@helenamt.gov>) and to Parks and Rec (parksandrec@helenamt.gov<mailto:parksandrec@helenamt.gov>) regarding the bulldozing now underway above and below the Adams St. Trailhead. This is what it looks like just above the Trailhead. [cid:image005.jpg@01D7B086.6B0588B0] 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. 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: • 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. • 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. • when gueried 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.

T			
		although the original plan for the "trail" was about 1/2 mile	
		(https://www.ktvh.com/news/work-begins-on-ada-accessible-trail-	
		<u>at-mount-</u>	
		helena <https: url?u="https-</td" urldefense.proofpoint.com="" v2=""><td></td></https:>	
		3A www.ktvh.com_news_work-2Dbegins-2Don-2Dada-	
		2Daccessible-2Dtrail-2Dat-2Dmount-	
		2Dhelena&d=DwMFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-	
		v5A CdpgnVfiiMM&r=LxwVeY2V1N5Qi5Jbagvjv6k YH5mEa58J0H5	
		neA3BLY&m=JJ7v2JE_tZb29GrEuKpHUekdZaA7_pkTTeGiZRElWkc&s	
		=O5K0BKlekiOSDXzphgNSFM-nWpdWm9V0o blhOYERCk&e=>) 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.	
		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.	
		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.	
	1	and the second of the second o	

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 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. There is a lot more that could be said about this issue but here is what is needed:
 If possible, walk a short section of the bulldozed section west of the trailhead. Perhaps take one or two pictures. Send emails to the mayor and commission, to the City Manager and to Parks and Recreation about your observations (addresses listed above). 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. 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!

09.21.2021	Jeff Sherlock	mookster007@gmail.com	Dear Mayor and commissioners: 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. 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. 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. 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. 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. Thanks again for your time. Best regards	Please see response above.
09.22.2021	David Hull	hulmac@bresnan.net	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	hlrietz@gmail.com	Parks and Recreation Department:	Please see response above.

			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. THIS IS COMPLETELY UNNECESSARY, and the development of this trail should be halted at the current point and taken no further. 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. 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 insult those of us who put so much time, effort, and personal money into doing what you claim you are doing now. What's more, your proposed trail would degrade the current, beautiful experience Mt. Helena offers to us all. Rest assured you will meet with our STRENUOUS AND HIGHLY PUBLIC opposition to what you propose. STOP NOW.	
09.23.2021	Jeffrey Sherlock	Mookster007@me.com	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. 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??	Please see response above.

			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. Finally, have you folks received any documents from the disabled community used as input on the design of Phase I or II. 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. Best regards	
09.23.2021	Pam Attardo	PATTARDO@lccountymt.gov	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. 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.	Please see response above.
09.23.2021	Dal Smilie	dalsmilie@aol.com	Can you please forward any plans and information associated with the project? Pam I suppose you will get lots of emails on this. All of them opposed to the ADA trail and any extension. 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	Please see response above.

			drop by today very concerned about Ken Edens allegations, one left in a	
			huff when hearing we were not up in arms about this.	
			We live right on Mt Helena. We walk our dogs on it every day (unleashed	
			mostly). We live right below this new trail.	
			I served on the first Open Space Committee, helped fund and build the	
			little signage shelter at the main entrance, first suggested access to the	
			main entrance be through Reeder's 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.	
			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.	
			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.	
			And of course open to those with well minded and unleashed dogs. And	
			those on bicycles.	
			those on bioyoles.	
			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.	
09.26.2021	Connie and	dcole@mt.net	As residents of the Helena area for over fifty years, my husband and I	Thank you for your comments. Trail work
	David Cole		have been devoted to land conservation and public service. As a 19 year	began in the spring of 2021 on the Mt
	L	L		2": D

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 over 13,000 acres of land permanently protected for public use that was funded with the approval of the Lewis and Clark County Commissioners.

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. 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.

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.

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.

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.

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

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 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 addition public comment and involvement. Again, as constructed, the bulldozed trail in no way resembles the project presented during the Zoom meeting.

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.

Process that included comment periods and four public meetings before approval.

The first goal in the City newly adopted Helena Open lands Management Plan, Recreation Chapter is to 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.

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.

	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.
	There have been questions raised about the trail's ADA compliance. It is important to note that Federal ADA standards provide guidelines 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 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
	The completed trail will be roughly one-half mile in length. ADA guidelines recommend a minimum 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.
	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:
	Change in the purpose of the trail or
	project.
	o 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.
		Change in location of the project such as
		a different drainage or draw, different
		trailhead, or different area of open
		lands.
		 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.
		Changes to length of the trail more than
		one-half mile.
		The length of the trail shortened
		approximately 0.10 miles.
		Changes that are not acceptable to the
		project proponent (if not the City).
		o Open Lands Manager consulted
		Rotary (project proponent) and they
		accepted the modification to the
		alignment of the trail.
		 Changes that negatively impact the
		environmental/wildlife/visual character
		of the trail or project.
		 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.
		vantage point in town.

	Changes that increase the infrastructure
	impact/construction.
	o The change does not increase
	infrastructure and decreases
	construction activities.
	Changes that increase the cost or
	duration of the construction of the
	project more than \$25,000 or more than
	one year.
	o The change does not increase the cost
	or duration of the project.
	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.
	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.

				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 only a preliminary proposal 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
09.27.2021	Judy Fay	judyfay@bresnan.net	Dear Helena City Parks and Recreation Staff, I am writing to express my concern about the trail project currently	and engagement program. Please see response above.
			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.	

			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. 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	
			ADA trail already in use, this project appears to be a duplication of efforts, time, and money. Thank you for your time and consideration of my comments.	
09.27.2021	Dr. Michael Bergkamp	docberg@bresnan.net	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	hwinsor@mt.net	Dear Sirs and Madams: 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! Please immediately cease this project until proper public input is received.	Please see response above.
09.27.2021	Jim Robbins	jimrobbins@mt.net	Dear City Manager, Parks and Rec and City Commission I am writing to adamantly oppose the bulldozing of Mt. Helena to create a new ADA accessible trail.	Please see response above.

			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. 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.	
09.27.2021	Steve Platt	Splatt4570@gmail.com	Dear Helena City Officials, Please halt activity on the ill-advised gravel path currently under construction on Mount Helena. 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. 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. 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. 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.	Please see response above.

			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. Come on guys, it shouldn't be this hard to get Helena City Parks projects	
09.27.2021	Ms. Chris Deveny	Cmdeveny7@gmail.com	right. Dear Helena Mayor, Commissioners and City Manager - 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 approved by the Commission. The trail route, slope, elevation gain,	Please see response above.
			length and overall magnitude of the project are all extremely different from the information provided. I implore you to immediately stop all trail construction, reclaim the resource damage done and open up a public discussion about this fiasco. 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.	
			Once again, I find myself very disappointed that our open space parklands are being so carelessly managed by our city personnel and leaders. Please keep me informed regarding this issue. Thank you.	
09.27.2021	Joel Peden	jpeden@mtcil.org	Hi Kristi, 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. (SEE ATTACHMENT "A")	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:

				 Elements 1-3 with the modification that dog leash usage would be encouraged and downhill bicycle travel discouraged. Elements 4 & 5 would explored for potential implementation if feasible.
09.27.2021	Gregg and Wendy Wheeler	westernwheelers@msn.com	Dear Mayor, Commissioners, City Manager and Department of Parks & Recreation, 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. 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.	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. 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. 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.
	The first goal in the City newly adopted Helena Open lands Management Plan, Recreation Chapter is to 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.
	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.
	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.
	the project.
	There have been guestions raised about the
	trail's ADA compliance. It is important to
	note that Federal ADA standards
	provide guidelines 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
	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
	11 1-70 Slopes for 5 feet of full
	The completed trail will be roughly one-half
	mile in length. ADA guidelines recommend
	Time in tength. Non gaidelines 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.
	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:
	Change in the purpose of the trail or
	project.
	o The purpose of the project is not
	changed. The purpose of the project,
	as proposed and built, is to provide
	 as proposed and sunty is to provide

1	T	
		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.
		• Change in location of the project such as
		a different drainage or draw, different
		trailhead, or different area of open
		lands.
		 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.
		 Changes to length of the trail more than
		one-half mile.
		 The length of the trail shortened
		approximately 0.10 miles.
		 Changes that are not acceptable to the
		project proponent (if not the City).
		o Open Lands Manager consulted
		Rotary (project proponent) and they
		accepted the modification to the
		alignment of the trail.
		Changes that negatively impact the
		environmental/wildlife/visual character
		of the trail or project.
		of the trail of project.

	 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.
	Changes that increase the infrastructure
	impact/construction.
	o The change does not increase
	infrastructure and decreases
	construction activities.
	Changes that increase the cost or
	duration of the construction of the
	project more than \$25,000 or more than
	one year.
	o The change does not increase the cost
	or duration of the project.
	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.
	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.
				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 only a preliminary proposal 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
09.28.2021	Gayle Joslin	joznpoz@bresnan.net	Dear Mayor, Commission, Parks and Recreation Department, and City Manager: Where is the full and open public involvement in this "ADA" project?	and engagement program. Please see response above.

			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. 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. From what I have read, this steeply graded (up to 7%) route does not meet ADA standards, and completely duplicates the LeGrande Boulevard ADA route that already exists. So – who are you building this route for anyway??? Please cease and desist in further construction. Explanations are needed. And certainly reclamation	
09.28.2021	Michele	michele.na.mt@gmail.com	Dear Mr. Mayor and Commissioners,	Please see response above.
	Webster		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. 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. Please reclaim all the damage done with this trail construction activity and re- open public discussion on this project.

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. 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.	
			Mr. Zammitt did a TED talk in 4/2018 and the link to it is attached: https://youtu.be/qEDryWC7uBE In this talk, he stated that the prior summer (summer 2017?) MBG was approached by the City of Helena 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, who in the City of Helena approached MBG? 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.	
			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	Tonyjewett1@gmail.com	Hi Kristi - 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. Thank you for the opportunity to have this considered in your work plan for 2022. (SEE ATTACHMENT "B")	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.
09.28.2021	Angie Leprohon	angie@mt.net	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:	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

	 The current bulldozed trail does not follow the same route as the trail that was mapped out in the proposal. 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%. This project has not involved input from the disabilities community. This project duplicates the existing ADA trail on LeGrande Cannon, which was developed with input from the disabilities community. Please stop construction on this trail immediately and let the Helena community be involved in the planning process. 	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. 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. 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.
--	--	--

	The first goal in the City newly
	, ,
	adopted Helena Open lands Management
	Plan, Recreation Chapter is to 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.
	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.
	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.
	There have been questions raised about the
	trail's ADA compliance. It is important to
	note that Federal ADA standards
	provide guidelines 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
	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
	11 1470 Slopes for 5 feet of fair
	The completed trail will be roughly one-half
	mile in length. ADA guidelines recommend
	a minimum 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.

	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:
	Change in the purpose of the trail or project.
	 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.

Change in location of the project such as
a different drainage or draw, different
trailhead, or different area of open
lands.
 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.
Changes to length of the trail more than
one-half mile.
 The length of the trail shortened
approximately 0.10 miles.
Changes that are not acceptable to the
project proponent (if not the City).
o Open Lands Manager consulted
Rotary (project proponent) and they
accepted the modification to the
alignment of the trail.
Changes that negatively impact the
environmental/wildlife/visual character
of the trail or project.
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.
Changes that increase the infrastructure
impact/construction.

	o The change does not increase
	infrastructure and decreases
	construction activities.
	Changes that increase the cost or
	duration of the construction of the
	project more than \$25,000 or more than
	one year.
	o The change does not increase the cost
	or duration of the project.
	or duration of the project.
	The constructed of the state of
	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.
	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.

				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 only a preliminary proposal 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.
09.28.2021	Terry McLaurin	terrymaclaurin@gmail.com	Dear Mayor, Commissioners, City Manager, and Department of Parks & Recreation, 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.	Please see response above.

			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. 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. 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. Thank you for your consideration	
09.29.2021	Dick Thweatt	dickthweatt@gmail.com	Dear Mayor, Commission, Manager, and Director: 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 better route could have been selected. There are flat trails at Ten Mile park, and a non-motorized path along La Grande Boulevard. 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. So I ask you to please stop the construction immediately and reclaim this scar on our beloved municipal mountain.	Please see response above.

09.28.2021	Lisa Bay Norane Friestadt	lisamaebay@gmail.com	Memorandum: Minority Report from the Davis/DeFord Working Group To: Kristi Ponozzo, Brad Langsather, Karen Reese, Lindsey Gilstrap, Matt Culpo, Chase Peasley, Ellie Ray, Byron DeFord, Joel Peden, Charles Alverez From: Lisa Bay and Norane Friestadt Date: May 19, 2021 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. 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). 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	Thank you for your comments.
			Summary of Accessibility Standards for Federal Outdoor Developed Areas (U.S. Access Board, 2014).	

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.

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 one else in the Working Group besides Lisa and Norane reached out to the disabled community.

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.

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.

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 bike skills course. This will better assure the safety of all user groups on upper DeFord.

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.

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. 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. 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. 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. 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

experience for a wide range of people.

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

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

			quiet, safe trail experience, as well as the community of aging citizens recovering from surgery, strokes and other aging issues in general. 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.	
			COMMENTS RECEIVED AFTER 09.30.2021	
10.04.2021	Hugh Zackheim	montanazac@mac.com	Mayor Collins, Members of the Helena City Commission and City Manager Schalk: 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 compatible with the public presentation of the trail to be developed on the mountain.	Thank you for your comment – please see similar comment responses above.
			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. 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. Thanks for your consideration of this important community issue.	
10.04.2021	Bradly Maddox	bradly.maddock@gmail.com	Hi ParksAndRec! I apologize for not sending in comments during the 15 day comment period. 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. 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 area with the dirt jumps) be highly considered for a dual slalom course. Dual slalom course definition here. 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 https://www.trailforks.com/trails/deuces-wild-33570/ . 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	Thank your comment – we will review your proposal related to the DeFord Trail and determine the feasibility of integrating those suggested additions in final design.

			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.	
			Please feel free to contact me with any questions and thanks for all of your hard work making Helena an awesome place to live!	
10.04.2021	Margaret Regan	mregan@mt.net	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. 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. Beartooth Highway - 6% grade for the 6 mile steep switchback section https://urldefense.proofpoint.com/v2/url?u=https-3A www.bigskyfishing.com scenic-2Ddrives beartooth-2Dhighway-2D2.php&d=DwIDaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A CdpgnVfiiMM&r=PK-tXBCacywIAJ-SjC4MHexbGZWuGaYxvpEf2ZJAkWQ&m=da9iHPL7ORtvCDGas241Vs5z9iy ReaZOIQ17Y94i6fc&s=3cb4Iwe6CrKKXtGIt4zwZZNJTCpNItKd9BQKh-FkSWg&e=	Thank you for your comment.
			Going to the Sun Highway - 6% grade between the Loop and Logan Pass 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&d=DwIDaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-	
			v5A CdpgnVfiiMM&r=PK-tXBCacywIAJ-	
			SjC4MHexbGZWuGaYxvpEf2ZJAkWQ&m=da9iHPL7ORtvCDGas241Vs5z9iy	
			ReaZOIQ17Y94i6fc&s=lft_usdpTJs15vysTi6Qrv3thIvdv9oCXU7bV6lxsFU&e	
			CURRENT TRAIL - 7% grade	
			MacDonald Pass - 8% grade	
			Trucks warned "Steep grade / 25 mph speed is recommended"	
			TI ADA : 1 15 442 1	
			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 rams,	
			just to get into and out of buildings. A trail with a 7% grade would be very	
			challenging. It is too steep.	
			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.	
10.06.2021	Luke Osborne	luke.osborne99@gmail.com	Dear Kristi and Parks and Rec Dept:	Thank you for your comment – the City is no
				longer proposing to move forward with
			Please accept my comments on the Mount Helena ADA Trail projects:	Phase 2 of the Mount Helena Trail project.
			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?	
			I have some concerns and questions with the proposed Phase II trail:	
			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?)	
			provide: j	

	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?	
	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?	
	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?	
	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	
		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?	
		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	
,		,	

	1			
			would imagine the trail would have a significant visual impact to the	
			front of Mount Helena, looking more like a road than a trail.	
			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.	
			Updated: 10.26.2021	
10.10.2021	Joan D'Aoust	jcdaoust406@gmail.com	Please see my letter concerning the "ADA" trail, which I would like to be	Thank you for your comment – Please see
			added to public comments. I regret that the way the trail has been	comment responses above related to the
			planned and constructed has polarized many members of the	Helena ADA trail construction.
			community. I have also offered my observations on the LeGrande Cannon	
			Pedestrian Trail. It is an excellent option for members of the ADA	
			community, although access for wheelchairs might require minor	
			alterations at the barriers at both ends of the trail.	
			Letter:	
			The Mt Helena ADA Trail	
			After viewing (by Zoom) the Helena City Commission meeting on October	
			4 th , I have several comments. The trail was kindly offered by the Rotary	
			and funding provided to the Parks Department. There were minimal	
			opportunities for citizens to comment. The original plan presented to the	
			public was altered before construction in site and was located 300 yards	
			further up the side of the mountain. The planned elevation gain was	
			altered from 40 ft to 160 ft, with the slope changing from 2% slope to 7%	
			slope. These significant alterations were not publicized nor opened for	
			public comment. More importantly, the two major stakeholders—the	
			diverse members of the ADA community and those who hike Mt Helena	

regularly—were not consulted in the planning. At present the trail is partially constructed. There were comments by a wheelchair bound man that the trail was too steep and that his wheelchair sank into the deep fill surface of the trail. A woman whose daughter has cerebral palsy commented that the deep, soft surface meant her daughter would not be able walk there. Many of the comments by the ADA community noted frustration that the ADA community was not involved in planning.

For hikers, the ADA trail as it currently exists is an ugly gash bulldozed into the side of a beloved mountain. Moreover, the soft, deep fill surface will almost certainly wash away during rainstorms and snow melt. An environmental impact analysis by scientists certified to make such analyses was never obtained prior to construction. A review by the Historical Preservation Commission was required but apparently not done. This ADA trail was well intentioned but poorly planned and communicated to the community.

Almost every afternoon I walk the Le Grande Cannon pedestrian trail. I see people walking, jogging, biking, pushing baby strollers, birding, etc. I have never seen anyone using a wheelchair, walker, or other mobility device. This trail is wide, flat, level, and has a firm all season surface. It offers a walk through pine forests and wonderful views. I could easily see someone using a wheelchair or walker enjoying that trail. Has there been any effort to publicize that trail or the 10 Mile Trail to the ADA community? Do the vehicle barriers at either end of the trail limit access by wheelchairs or other mobility devices? On the east end of the trail there is approximately 33" to go around the barrier and 52" to go under the barrier. At the west end of the trail there is clearly not enough space to go around the barrier and 55" to go under the barrier. I do not know if this allows an adult in a wheelchair to access the train. Perhaps someone in the ADA community could evaluate this trail access. If it is inadequate, perhaps the Parks Department could alter the access to allow for wheelchairs.

			The idea of having more opportunities for the diverse members of the	
			ADA community is excellent and overdue. But planning must include	
			members of that community, hikers, and real technical expertise.	
			Respectfully submitted,	
			Joan D'Aoust	
10.12.2021	Dal Smilie	dalsmilie@aol.com	So glad to receive your notice and listen. So glad the disability community and not just the naysayers were there. The statement that we are all just temporarily abled is so true.	Thank you for your comment.
			temporarily ableu is so true.	
			I'm sad to hear that the continuation of the Mt Helena ADA trail is on	
			hold. Would like to see that done and even hook up to trails at Spring	
			Meadow and along the rails. With lots of benches. I urge you to schedule	
			that trail extension.	
			That would be so good for seniors, healing surgery patients, those who	
			need help walking or are in wheelchairs, young families and so on. Like	
			the trail system in Great Falls. It would lighten the load on some natural	
			or neighborhood trails also.	
			Our anangement should not only be for aux most abled	
			Our open space should not only be for our most abled.	
			Please continue to send me notices of these meetings.	
			Hope my Fox family finds a new den, I'm sure they have.	
10.13.2021	Kevin League	kevinleague@gmail.com	Hi Kristi and Brand.	Thank you for your comments – The City is proposing, with a few minor additions, the
			Please see our comments regarding the DeFord Trail (attached pdf). We	recommendations of the DeFord Working
			appreciate the work you do and for the time you spend working on these	group. We have not seen evidence of major
			issues.	user conflict on this trail, however, we have
				seen increased use of this trail and all of our
			Please confirm submission and let me know if you have any questions.	trails in the area. We are building

Cheers, Kevin	infrastructure for increased future use. The
	goal of the project is to accommodate for all
Letter:	these uses and provide some physical
	separation for users of varying speed. We
Hello City of Helena Open Lands Division,	agree that there are likely other locations
	that would better meet interest in quieter
Please accept our comments regarding the following proposed major	trail experiences, however, we are limited in
projects:	accessible parking areas to serve these
	potential trails and areas. And, we are also
1) Upper DeFord trail (North of the Old Shooting Range parking lot)	limited by the steep topography of the trail
Brad Langsather proposal	system. The City of Helena is open to
For the past nearly 8 years, my wife, daughter and I have lived at the	proposals for alternate trail locations.
DeFord trailhead. Our house overlooks the trail and we use and help	
steward the trails several times a week. We do not advocate for any	
particular trail user group, nor do we have a hidden agenda. We use the	
DeFord Trail for all variety of uses including: hiking, running, biking, cross	
country skiing, kids nature play, geocaching, birding and nature	
photography. We offer a unique perspective compared to the typical	
DeFord trail user who use the trails less frequently, do not live in such	
close proximity, or consider themselves aligned with one particular trail	
user type.	
This particular section of the DeFord Trail is very important to all users. It	
is a main connector to several points and jumping off points in the Mt.	
Ascension trail network and offers a safe route of travel off of Davis	
Gulch Road. It also features topographical and physical characteristics	
that make changes to the current trail somewhat difficult without	
considerable investment. It's worth noting that this is one of only a few	
trails in the entire Helena South Hills system that offers the opportunity	
for beginning bikers or even striders, including my daughter and	
countless other children that we have encountered over the years, the	

We also believe that the perceived conflicts with mountain bikes and hikers is overblown, and undocumented. As noted earlier, we live basically on the trail and use it very frequently for any number of uses mentioned above and we do not encounter conflicts. It's a nice wide trail, mostly free of obstacles and affords room to avoid other users. Trail users are almost always courteous, friendly and looking out for each other, including the users of the bike skills course. Folks concerned about 'highmarking' need to be reminded that the trail lies in a heavily altered landscape that was severely placer mined and follows an old road bed. To be honest, those 'high-marks' are very innocuous and make the trail fun. Seriously, the kids love them! If anything, they allow for additional room on the trial for all users. This proposal for the most part is trying to fix something that isn't broken.

While we do agree improvements to signage (pedestrian crossing, speed, shared-use, etc.) and formalizing the bike skills course with a 'sessioning' trail would be proactive and welcome, we do not agree to the remainder of the proposal including the following proposed actions:

- a) Widen and improve surface and high mark remediation
- b) Discouraging downhill bike traffic
- c) Creation of a parallel directional bike trail

Regarding the ADA items of this proposal, my comments for Joel Peden's alternate proposal will address those below.

2) Upper DeFord trail (North of the Old Shooting Range parking lot) - Joel Peden's Alternate proposal.

Note: using Google Earth, we found the proposed length of the trail (~1,600 feet) to be inaccurate. We calculated the length(s) of the trail to be the following:

- 1. Trail from Archery Range parking area to Davis Gulch = ~1,200 feet
- 2. An Interrupted portion of the proposed route that goes from Davis Gulch Road to the south end of the Old Shoot Range TH = ~800 feet.

3. Trail from Old Shooting Range TH to terminus at Dry Gulch = ~2,100	
feet	
We are in favor of offering trails to users with mobility and sensory	
challenges. We think having a trail that allows for a quiet and tranquil	
experience should be considered by our city. We feel that this type of	
trail would be important to not only this particular user group but for	
anyone wanting to have a peaceful experience. Matter of fact, we believe	
most of humanity could benefit from that! <u>However, we believe that the</u> location of a trail that offers these amenities is critical.	
location of a trail that offers these afficilities is critical.	
With this in mind, we believe the portion of this proposal that covers the	
approximately 1,200 foot long section of trail from the Archery Range to	
Davis Gulch Road, is not a suitable place for this type of trail. We feel the	
improvements required are far too great, and the result would create too	
much conflict with the other trail users. In short, it's simply not a peaceful	
section of trail and will not work well with the intent of the proposal - there are better places.	
there are better places.	
Also, it is important to note that as proposed, users starting at the	
Archery Range will ultimately encounter a difficult, awkward and lengthy	
interruption to their experience. Users wanting to continue and reach the	
beginning of the southern half of the trail would need to cross Davis	
Gulch Road and then navigate around or across the sprawling Shooting	
Range Trailhead to begin the second half of the trail. This interruption	
amounts to approximately 800 feet of non-peaceful, developed, shared with vehicle traffic section that we believe is very undesirable and, in our	
opinion, defeats the purpose of the proposal.	
ap	
However, if we only look at the longer southern portion of the trail from	
the Old Shooting Range to Dry Gulch (approx. 2,100 ft), we believe the	
proposal has merits worthy of exploring. This portion of trail is	
particularly quiet and surprisingly does not see much use. It is	

			unexpectedly isolated from the vehicular traffic on Davis Gulch Road and the users of a bike skills course that parallel the trail on either side. We go here to look for birds, to photograph, ski in the winter and generally find a peaceful experience here. There are a variety of natural features including seasonal water that makes this area more interesting from a wildlife perspective, lending to the area's peaceful demeanor and naturalness. We do believe that Joel's proposal fits and works well here and is worth considering. Finally, if the southern portion of the trail is used, there is no need for additional directional trails and ADA parking will be much easier to develop at the Old Shooting Range versus the much smaller and currently	
10.18.2021	Matt Culpo	mattculpo@msn.com	leased Archery Range. I support the City's recommendations for the Upper DeFord Trail North and South of the Old Shooting Range Parking Lot which are the same or very similar to the DeFord Trail Working Group's recommendations. I do NOT support the Alternative Proposal to the City's 2021 DeFord Improvement Project as presented by Joel Peden, but do support the City's recommendations.	Thank you for your comment.
			I served on the DeFord Trail Working Group. We discussed at length the possibility of restricting cyclists from using the DeFord Trail both North and South of the Old Shooting Range Parking lot to achieve additional ADA goals. It was determined by consensus that it was not possible to eliminate cyclist travel on the DeFord Trail because it serves as a main corridor to access the South Hills Trails and any restriction to cyclists would force some users including: children, elderly, and people with disabilities on bicycles, tricycles or quadcycles; and novice bike users onto the Davis Gulch Road and into a hazardous situation.	
			There are other locations that have a higher potential for an ADA trail with use restrictions.	

			The original DeFord Trail plan as recommended by the Working Group and City represents a best-case scenario which achieves significant strides to improve safety and ADA accessibility for pedestrians and cyclists.	
10.19.2021	Eva Culpo	Evaculpo2003@gmail.com	I support the City's recommendations for the Upper DeFord Trail North and South of the Old Shooting Range Parking Lot which are the same or very similar to the DeFord Trail Working Group's recommendations. I do NOT support the Alternative Proposal to the City's 2021 DeFord Improvement Project as presented by Joel Peden, but do support the City's recommendations. The original DeFord Trail plan as recommended by the Working Group and City represents a best-case scenario which achieves significant strides to improve safety and ADA accessibility for pedestrians and cyclists.	Thank you for your comment.
10.19.2021	Kody Shields	kdshlds@gmail.com	I support the City's recommendations for the Upper DeFord Trail North and South of the Old Shooting Range Parking Lot which are the same or very similar to the DeFord Trail Working Group's recommendations. I do NOT support the Alternative Proposal to the City's 2021 DeFord Improvement Project as presented by Joel Peden, but do support the City's recommendations. The original DeFord Trail plan as recommended by the Working Group and City represents a best-case scenario which achieves significant strides to improve safety and ADA accessibility for pedestrians and cyclists.	Thank you for your comment.
10.19.2021	Shannon Heath	sbheath@icloud.com	I would like to express my support for: 1) The Peden Alternative of the DeFord Trail project, 2) The HH Trail Inventory Assessment, and 3) The Whyte property Improvement with caveats.	Thank you for your comment.

			Thank you	
10.19.2021	Druanne Cote	druanne@gmail.com	Hello,	Thank you for your comment.
			I support the City's recommendations for the Upper DeFord Trail North and South of the Old Shooting Range Parking Lot which are the same or very similar to the DeFord Trail Working Group's recommendations.	
			I do NOT support the Alternative Proposal to the City's 2021 DeFord Improvement Project as presented by Joel Peden which would designate DeFord as pedestrian only.	
			The original DeFord Trail plan as recommended by the Working Group and City represents a best-case scenario which achieves significant strides to improve safety and ADA accessibility for pedestrians and cyclists. It also encourages enthusiasm for youth cycling in Helena and allows riders of all ages to develop and improve cycling skills.	
			As a Helena resident living in close proximity to the Eagle Scout trailhead I utilize the DeFord trail frequently both via bike and on foot. I fully support accessibility to Helena trails for all users and believe the City's recommendations achieve this access for a broad range of constituents.	
10.21.2021	Christine Thennis	cthennis@gmail.com	I support the City's recommendations for the Upper DeFord Trail North and South of the Old Shooting Range Parking Lot which are the same or very similar to the DeFord Trail Working Group's recommendations.	Thank you for your comment.
			I do NOT support the Alternative Proposal to the City's 2021 DeFord Improvement Project as presented by Joel Peden, but do support the City's recommendations.	
			The original DeFord Trail plan as recommended by the Working Group and City represents a best-case scenario which achieves significant	

10.21.2021	Helen Bosch	Helenabosch12@gmail.com	strides to improve safety and ADA accessibility for pedestrians and cyclists. Sincerely I support the City's recommendations for the Upper DeFord Trail North and South of the Old Shooting Range Parking Lot which are the same or	Thank you for your comment.
10.07.0001			very similar to the DeFord Trail Working Group's recommendations. Thanks	
10.25.2021	Lisa Bay	lisamaebay@gmail.com	City Leadership and Parks Staff: Thank you for the opportunity to comment on the full array of 2021-2022 major projects proposed for Helena Open Lands by the City and members of the public. 1) Upper DeFord trail (North of the Old Shooting Range parking lot) proposed by the City: I support this project with significant caveats. I request that the Parks staff openly identify for the public each Universal Access technical specification that will be included in the project and the source of those specifications. In previous questions from the City Commission on whether UA specifications were being met on the MT Helena "ADA" trail, staff solely addressed complying with slope requirements and not several other, and equally important, best management practices and guidelines that keep people safe. Secondly, if the Parks staff does not meet all the technical specifications of a Shared-Use Path on DeFord, drop this trail classification and simply call it the DeFord Trail. A Shared-Use Path has a specific meaning according to the U.S. Access Board, and for the City to bill the trail as such when improvements may not meet UA standards, is unsafe. Further, current UA guidelines and best management practices are anticipated to become law, at which point, to build a non-compliant trail would be illegal.	 The City is proposing, with a few minor additions, the recommendations of the DeFord Working group, which incorporates ADA accessibility guidelines for slope, width, surface materials, facilities, etc. The Parks Department will forward recommendations specific to Davis Gulch road to our transportation department for consideration as they work towards improvements on the road corridor. See response above. Thank you for your comment. This will be addressed as a specific budget item, likely over several budget cycles. HOLMAC, at this point, will continue to serve as the advisory group for open lands projects such as this. Thank you for your comments.

I strongly urge equal safety considerations for pedestrians and the mobility-impaired as is currently being displayed for bike users. All users need to feel safe on the trail. Please consider additional methods of assuring bike safety on DeFord/Davis that also help ensure pedestrian safety. These considerations would include: Creating a dedicated and potentially raised bike lane on Davis Gulch, and conducting an aggressive road signage and enforcement campaign to slow vehicular traffic on Davis Gulch. Offer a more assertive statement in this proposal about providing ADAcompliant parking in the Archery Range (AR) parking lot. I would amend the Park staff's recommendation from: "Consider the creation of ADA parking in the Archery Range parking lot." to "Contact the current AR lessees in early 2022 about amending the lease to provide two ADAcompliant parking spots at the AR parking lot."7. My understanding from Brad Langsather is that the City has the AR leased out for a considerable period into the future; however, this lot is rarely, if ever, full. With a positive commitment to try and make this happen, it has a far greater likelihood of occurring. Otherwise, those constituents who need ADA parking to use the Shared-Use Path will only have access at the Old Shooting Range parking lot.

- 2) Upper DeFord trail (South of the Old Shooting Range parking lot) proposed by the City: I oppose this project. The City has been offered a well-conceived alternative proposal from mobility/sensory impaired community, as displayed under the Peden alternative, below.
- 3) Alternative Proposal to the City's 2021 Upper DeFord trail (South of the Old Shooting Range, proposed by Joel Peden: I fully support this proposal. While the Parks staff proposes a Shared-Use Path on this 1,600-foot section of DeFord, Mr. Peden's proposal is designed to accommodate the specific needs of sensory/mobility impaired

individuals. Universal Access advocates have told the DeFord Working Group that they needed UA Pedestrian Trail, not a Shared-Use Path, for reasons of safety: avoiding collisions with faster moving vehicles, and the interference of overly playful or aggressive dogs. I believe it is long-overdue that we listen to and include Universal Access advocates in our trail discussions and design. This would be a sterling opportunity to do that, while still accommodating the existing and proposed skills courses along DeFord. In my book, this proposal is a winwin for all users. 4) City Of Helena Open Lands System Management and Etiquette Plan, proposed by Helena Hikes: I support the Helena Hikes proposal for a comprehensive trail inventory and management plan, along with an enhanced etiquette program. Helena's trails are beloved, and in some cases, loved a little too much: they need our care and stewardship. This project will shift the focus over time from building more trails, to stewarding what we have and anticipating the care of, and costs associated with, new trails. I urge City leadership to create a specific budget item for this work, and establish a citizen advisory group to assist in crafting the project goals, workplan, and citizen engagement. 5) Whyte Acquisition Trail Improvement Project, proposed by PPLT and the City: I contributed to the acquisition of this property because I believe it is a great addition to the HOL, and because its current unmanaged and extensive use requires stewardship. This proposal, if adequately funded over time, will accomplish that. But it will need annual workplans, budget items, and emphasis on stewardship to repair current damage and reorient use. This project will be complex, and should include all constituencies, particularly because it has potential for

			Universal Access trails that may also necessitate UA improvements to the LeGrande trail.	
			Thanks for considering my comments.	
10.25.2021	Jake and Kelsey	Jake.gunther21@gmail.com	Dear Parks and Rec Department Employees:	Thank you for your comments.
	Gunther		Please see below for our comments on the proposed open lands major projects.	
			Feedback on recent events:	
			How is it possible that our City's government has now stopped	
			work on two different trail projects that are substantially	
			complete in the past five years? It is one thing to not support the	
			next phase of the ADA trail moving forward, but it is ludicrous	
			that we are in the same spot now as we were with the new bike	
			trails on Mt. Ascension - the work is almost done, just finish it!	
			And if you are actually hearing about threats to construction	
			workers then why on earth would you allow those crazy people to	
			get exactly what they want by stopping the project?	
			 Proposed changes to dog leash laws on City Open lands - I realize 	
			this is not part of the major projects list but felt the need to write	
			anyways after reading the recent IR article on the matter. Please	
			do <u>not</u> make any changes to our leash laws - the current policy	
			requiring dogs to be leashed at trailheads is working fine and no	
			further changes are needed; especially when the proposed	
			changes would be completely unenforceable and would only lead	
			to additional trail user conflict. There are tons of places in this	
			City that require dogs to be leashed (Spring Meadow Lake, 10	
			Mile, the entire City itself); it is absurd to think we need to	
			extend those same policies to our open lands.	
			 On the matter of unenforceable city policy I would encourage you to reconsider the ban on e-bikes on City Open Lands. I am not 	
			you to reconsider the ball on e-bikes on City Open Lands. I am not	

an e-bike user myself but want them to have every opportunity to
use our public lands that I do when I go for a hike or bike ride.
Feedback on major projects:
Upper DeFord Trail - I support the proposed improvements to the as
noted in the Proposed Major Projects list.
Mount Helena ADA Trail Construction Project
I am very dismayed to hear that the City is considering removing
this project from consideration. I understand there are some
people concerned about how the trail looks during construction,
but would encourage you (and them) to see the forest from the
trees on this matter and understand that the trail will quickly
blend into the landscape as it is re-seeded and becomes
vegetated. Please do not allow temporary impacts to influence
the permanent status of our trails. The same people complain
about the width of the trail while lacking any understanding of
ADA requirements and design. As a civil engineer, I encourage
you to continue to support a wide ADA trail that will allow for two
wheelchairs to pass each other; while understanding that the
topography of the area will require some segments of the trail to
be on a steeper longitudinal grade than would otherwise be
desired - this is still in compliance with standards provided that
intermittent benches (flatter areas) are included to allow
accessible users to rest.
Sadly, I have come to expect you to make reactionary decisions
based on a small but vocal minority of residents who are opposed
to any and all improvements on our open lands in Helena. Why
do you continue to allow these angry people to dictate city
policy? It is a fact that our city and surrounding area will continue
to become more and more populated and is only logical that we
continue to expand and improve our amazing public lands.

- The public process is NOT working when you make knee-jerk reactions based on this vocal minority or angry residents. The public overwhelmingly supported this project, and many of them have no idea the changes you are in the process of making. I encourage you to reconsider this project on the basis of the entirety of public input over the course of the entire project development not just the vocal minority of residents who have voiced their opposition in the last two weeks.
- What type of message are you sending to the disabled community when you allow able-bodied trail users to prevent them from enjoying experiencing our wonderful trail system by providing them new opportunities to experience it? Please keep these under-represented but overly-impacted people in the accessible community at the forefront of any of your decisions on the proposed ADA trail.

Whyte Acquisition Trail Improvement Project - I am not familiar with this area and did not have time to review the proposed projects in detail. I would encourage all trail work in this area to include a focus on bike-friendly design, even better if some of the new trails could be bike-oriented to help reduce trail user conflict by separating user groups a bit more.

City of Helena Open Lands System Major Project (Tony Jewett)

• I do not support devoting valuable time and City resources to this thinly-veiled attempt at reducing and limiting future growth opportunities for our trail systems. City staff (and PPLT) are perfectly capable of closing down social trails without the need for a formal trail inventory effort. Tony is a rabid anti-bike activist and is continually in search of a problem that doesn't exist.

Alternative Proposal to the City's 2021 DeFord Improvement Project

			 I have no problem with making the climbing portion of the trail heading south from Shooting Range ADA-compliant. I think that is a great idea and one of the few places on City lands that can accommodate the needed design elements. I'm indifferent to the bike signage - no one descends this portion of the trail anyways. I am against installing additional pet leash signs - it is unnecessary and completely unenforceable in this area. Thank you for your consideration. 	
10.27.2021	Emily Lynn	emilyteske@gmail.com	To whom it may concern, I would like to give my support to the City's recommendations for the DeFord trail. This entire length of trail is an asset to our youth and to trail users in general. Please keep this trail open to bikes. The skills course and the jump lines are a destination for both Helena mountain bikers and out of town mountain bikers. It's always great to see so many kids out on DeFord on their bikes. So once again, please keep this trail system open to bikes with the City's recommendations. Thank you	Thank you for your comment.
10.27.2021	Hermes Lynn	hermeslynn@yahoo.com	I support the city plan for mountain bike directional trails and jumps for kids. Hermes Lynn	Thank you for your comment.
10.28.2021	Derek Sullivan	derekmsullivan@gmail.com	I support the City's recommendations for the Upper DeFord Trail North and South of the Old Shooting Range Parking Lot which are the same or very similar to the DeFord Trail Working Group's recommendations. I do NOT support the Alternative Proposal to the City's 2021 DeFord Improvement Project as presented by Joel Peden, but do support the City's recommendations. The original DeFord Trail plan as recommended by the Working Group and City represents a best-case scenario which achieves significant	Thank you for your comment.

		strides to improve safety and ADA accessibility for pedestrians and cyclists.	
10.28.2021	Liz Eden	strides to improve safety and ADA accessibility for pedestrians and cyclists. Dear Mayor, City Commissioners and City Manager, 1. Peden Alternative I am very impressed with the thought and personal experience of Mr Peden. The term "ADA" is not always applicable to trails. It is outdated terminology. Universal Access covers a broad spectrum of people. It is the Gold Standard and has defined requirements. I hope the City adheres to every aspect of Mr Peden's proposal.	Thank you for your comments.
		 We need to take care of what we already have. This is a good time to assess current trails and remove those that are unsustainable. PPLT has a volunteer group that meets regularly for the express purpose of trail maintenance. They are guided by experts and participate in carefully planned projects. Hand tools are provided. Shared trails only work if all parties recognize how important it is that bikers and hikers must make accommodations. Consistent rules and civil encounters ensure that all participants enjoy their experience on Mt Helena. We need to develop a culture of caring and sharing. I noticed after PPLT put up etiquette signs and the IR did some articles on bikers yielding to hikers that I had several very nice conversations with folks who stopped their bikes for me and said pleasant things such as "Enjoy the rest of your hike!" "Great day to be out!" "Hikers before bikers". Also loved the bikers who had bike bells that were audible and rang them in advance if they were behind me. 	

			 Whyte Property Trail Proposal PPLT has the experience and the mission to direct this "jewel" of an opportunity. Citizen participation continues the sense of community that brings pride and ownership to Mt Helena. We need those citizens to help maintain and be stewards of these trail which have increased in number over the 	
			past 20 years.	
10.29.2021	Chris Deveny	cmdeveny7@gmail.com	Please accept my comments on the following Proposed Open Lands Major Projects for 2022: DeFord Trail: I support the Peden Alternative, the first trail I am aware of that has been suggested by a disabled person and that is fully compliant with Universal Access Guidelines. I request that the City commits to Universal Access compliance on the DeFord trail as well as to the safety of pedestrians for the Shared-Use Path. Setting speed limits on this trail and on Davis Gulch is needed. And obviously, the current high marking damage needs to be repaired and prevented. Helena Hikes/Tony Jewett Trail Inventory, Assessment and Etiquette Project: I believe this entire proposed project is the most important and most needed project for our open space public lands and is long overdue. I urge you and the Parks and Recreation Department to make on-going funding for this project a priority and ask you to develop a clear work plan and budget with measurable goals and timelines. An objective and balanced citizen advisory group should be formed to assist with the work plan development and to help ensure that local citizens are engaged in the process.	Thank you for your comment.

			 Whyte Acquisition Trail Improvement Project: I support this project with the following key suggestions for ensuring land stewardship and an open public process: This is a huge project which needs a multi-year work plan outlining the "major projects" to be brought before the public for discussion on an annual basis. I ask that Goal 2 ("Using stewardship as the guiding principle") be emphasized in all the actions undertaken within this project. This includes prioritizing the restoration of the natural conditions of these open lands. I believe the City and PPLT should design a robust public outreach effort for this project that involves interested and affected stakeholders including those who were involved with funding and protecting these lands. Thank you for the opportunity to comment. 	
10.12.2021	Matt Culpo	2 nd Listening Session Comment	Matt began by adding some context for HOLMAC related to the DeFord Project because Matt proposed part of this project. The project was two pieces. One was making the DeFord Trails some safety improvements on the upper DeFord skills course and making the lower skills course longer more official. That has been there for a long time and used for a long time. Initially the reason Matt came up with that suggestion is that he heard from the community some issues with bikers going down the DeFord trail fast , high-marking, and just displeasure with the way it was	Comments noted – the City is recommending, with some minor additions, the recommendations of the DeFord working group.
			used by the hikers. So he saw an opportunity to propose a project where you would get most of the bikers off of the DeFord trail and onto a downhill trail (or bikes skills trail). To a large degree, the purpose was to alleviate some of the issues that people were having with the DeFord trail. From there it became part of a larger project with the ADA improvements that were also proposed on the DeFord trail. So the	

			4working group was formed and we went through and discussed a lot of	
			the issues that were brought up tonight about bicycles remaining on the	
			DeFord trail. It's always been a multi-use trail and we came to the	
			conclusion that it needs to stay a multi-use trail. A lot of this had to do	
			with the issues that if you are trying to appease one group, we ended up	
			harming another group. Mainly the harmed group would consist of the	
			high-skilled bikers, and children that would just be left out. The only	
			other place they have to go is on the road, and that was decided, by the	
			working group, to be unacceptable. Ultimately, if the project goes	
			through as proposed by the City (where bikes remain on the DeFord	
			trail), Matt thinks that what you will see is a drastic reduction of the	
			number of users on the DeFord trail, and certainly the reduction of the	
			number of people going down-hill on the DeFord trail, because they are	
			going to choose the bikes skills course. This is where the working group	
			ended up and Matt hopes that HOLMAC sees that and agrees with the	
			City and can support the city's recommendation to move forward with	
			the working groups recommendation. All that being said, Matt added	
			that he feels there should be opportunities like Joel has presented – we	
			need to look for those. Matt feels this particular trail (the DeFord) turns	
			out to not be the correct place mainly because there is no route for the	
			bikes to go up DeFord or for the younger/older users that don't ride to a	
			higher level – they have no other place to go but the road. That scenario	
			is unacceptable.	
10.12.2021	Jeff Bradley	2 nd Listening Session Comment	Provided comment on the Phase 2 of the Mount Helena project that the	Thank you for your comment.
	,		City has decided not to pursue this year. Jeff was disappointed to hear	, ,
			this. In his mind, that project offered a great opportunity for people that	
			are perhaps less able to get out on to the remainder of our trail system or	
			those folks like Jeff who said this phase would have provided a great	
			opportunity for him to take his daughter cross-country skiing this winter;	
			take her on the trailer towed behind his bike which he is unable to do on	
			the majority of our trails. Real disappointment. He hopes HOLMAC	
			considers going against the City's decision on this one.	
L	1	1	1 0: 0:0:	

10.12.2021	Tony Jewitt	2 nd Listening Session Comment	Because we seem to agree about the value of the project he presented,	Thank you for your comment, see responses
			Tony suggested and recommended that the department put together a	above.
			work plan that enacts his plan over a period of time so the public is aware	
			of the projects coming out and will take an interest in them and can	
			comment and assist with it and puts it on a timetable because Tony	
			thinks this is foundational – the way that we as a community not only	
			treat our lands, but the way we can engage in their use and their	
			planning and management. Tony hopes that as part of this project, we	
			come up with a work plan that puts this thing on a timetable with a	
			budget that we can all support and work with you on.	
10.12.2021	Lisa Bay	2 nd Listening Session Comment	Lisa wants to endorse and agree with Joel's recommendations. She thinks	Thank you for your comment, see responses
			there is good potential out there and she is really glad that the City is	above.
			considering another potential Universal Accessible trail out there. She is	
			encouraged about how this could go and thinks there are good	
			suggestions coming through for it.	
			Short Comment Read: With its current Mount Helena trail under	
			construction and the proposals for a shared use path and the Universal	
			Access pedestrian trail on DeFord, city staff and interested public have	
			entered into a whole new realm of trail development and it's a realm that	
			includes pretty complex guidelines and best management practices. They	
			derive from several federal laws and the US Access Board and while they	
			are only recommended practices now, they are proposed to become	
			mandatory for both state and local agencies and land trust. Therefore,	
			any construction of universal access trails should be built as closely as	
			possible with these standards. Brad furnished Lisa with the 2012 US	
			Forest Service Accessibility Guidelines that he's following and Brad would	
			probably agree with Lisa that these guidelines are to follow in places and	
			are heavy with mandatory protocols and processes, a lot of which don't	
			apply to the City. Lisa proposes that before staff or HOLMAC embarks on	
			any more accessible trail development design, that they draft a proposed	
			set of guidelines/best management practices that are going to apply to	
			these types of trails. Universal Access Standards were developed by trails	

			experts to keep people safe. This would also keep the city safe from complaints and possible hazards and liability. Lisa's research shows the decomposed granite is specifically called out as a material that cannot achieve desired stability that is called for under these guidelines. Further, signage requirements are very specific and rather than claiming to provide an accessible trail, let's wait to call them as such until unless or until we can make them so. We probably need another step or two in the review process so that the public understands exactly where and how universal access trails are going to be built. And finally, Lisa thinks we have gotten where we are because we need to listen first to the folks that will use these trails. We need to understand that one in five Americans (20% of us) are now considered to have a disability, including advanced age which significantly limit life activities like walking, seeing, hearing, breathing and thinking. The desire to be in nature diminishes for very few of us. If we are lucky enough to live long enough, each and every one of us is likely to become disabled in one way or another. So let's get disability reps involve as we are starting to do with Joel and others. The comments tonight are so important. Let's get good and clear universal access guidelines in place for the city and the public and lets build paths and trails that are safe that we are able under the best management practices. Lisa lends strong support for Joel's universal access addition to the City's proposal for DeFord. She also wants to point out to this group that there was a minority report that was written for DeFord. She understands that was included in the packet to the members of HOLMAC, but she wants to make sure that the rest of the public is aware that there is a minority report on that decision.	
10.12.2021	Bill Lombardi	2 nd Listening Session Comment	Thank you to the City for all their hard work. Bill echoed what Tony Jewitt and Lisa Bay just said and added that he is glad Joel is getting the disability community involved. What we are hearing tonight is that we need public communication. It is really important to get the facts out there because we see a lot of stuff online these days and some of it is true and some of it is not. As tony said about the projects – putting them on a timeline. Let the public know. The more information we can get out,	Thank you for your comment.

			so much the better. He looks forward to work with the city and is glad we have reached out to the disabilities community.	
10.12.2021	Claudia Clifford	2 nd Listening Session Comment	In reacting to what Lisa and said as well as Joel, it really has made her realize that even last year when we were looking at an ADA Trail, we really needed more information. She thinks that calling something an ADA Trail created a whole set of expectations about something that may or may not have been what ended up in reality. So, with this proposal from the working group, it sounds like what Claudia got from Brad is that he would like to use the USDA Guidelines as part of the improvements of the DeFord trail. She would like to know what part of the USDA Guidelines Brad is looking at and maybe compare those (via a chart) with the Universal Access Guidelines so we are all fully informed as to the choice we are making and the improvements that may or may not happen. The devil is in the details here as we look at what we experienced with Mount Helena. It is important to have that comparison fully vetted.	The City of Helena Open Lands follows and implements guidelines related to accessibility, specifically employing guidelines in the "Accessibility Guidebook for Outdoor Recreation and Trails" published by the USDA, USFS, USDOT and Federal Highway Administration.
10.12.2021	Joel Peden	2 nd Listening Session Comment	Joel stated that the guidelines for ADA accessibility guidelines can be very confusing – even to the disability community. One of the goals for the City and for HOLMAC should be that when looking at the guidelines, we don't necessarily choose to comply to the easiest one that is out there or best fits the situation that we are in. Joel reminds people that the ADA guidelines and suggestion that that are out there are the worst that we can do as a community. If this is the bar we set, and compare that with other improvements we do throughout the city, all our streets would be dirt and gravel. This takes a commitment from the city and the community to say "we want more than the minimum standards". So as we look at these things, we need to put in the effort to go above and beyond. In addition, as far as accessible trails, there are people in the ADA community looking for more aggressive trail. Joel has friends within the community who do downhill biking and have spinal cord injuries. There is a group of adventure seekers. Question – is there a way to come up with a grading system for trails we would like to make accessible that would be available to the public? That "rating system" would let the	Thank you for your comment.

			person in the community know before they get to the trail how difficult it	
			may be. They can then make a choice of whether they want to use a	
			specific trail based on the rating system criteria. This is another way to	
			educate and inform the public before they go to a specific trail.	
10.12.2021	Multiple	2 nd Listening Session Comment	CHAT COMMENTS – These are the comments that appeared in the Chat	Thank you for your comments.
		CHAT COMMENTS	section of the ZOOM Meeting on 10.06.2021	
			Jess: Is there a jump track that parallels the proposed pedestrian	
			only trail? Would that in itself cause issues?	
			 Joel G: Would Uphill only bicycle traffic present an issue? 	
			Matt Culpo: Where are the children or other users with impairment	
			that can use bikes supposed to ride? It sounds like the proposal	
			would have them use the road and the road is too narrow and	
			dangerous.	
			 Elizabeth's iPad: Regarding Joel's question re: accessibility on 	
			Whyte property trails, there is a meadow just beyond the bridge on	
			closed section of LeGrande which appears to provide a possibility	
			for such a trail.	
			Norane Freistadt: Thank you, Joel, for those comments that remind	
			us we can do so much better than the bare minimum requirements	
			for accessibility. No matter what age we are, we are all aging and	
			our community deserves some trails that can be accessible for a	
			wider range of people.	
		Ac	dditional Comments: Updated 11.09.2021	
11.05.2021	Tom Kilmer	tom.montana.2011@gmail.com	Hello. Please accept these comments for the record regarding the Open	1) The City is proposing, with a few minor
			Lands Work Plan for 2022. Please see below. Thank you. Tom Kilmer	additions, the recommendations of the
				DeFord Working group, which
			2 November 2021.	incorporates ADA accessibility
				guidelines for slope, width, surface
			Mayor and Commission, City Manager, Parks and Recreation	materials, facilities, etc. The Parks
			Department.	Department will forward
				recommendations specific to Davis

Please accept these comments for the record regarding the 2022 Major Projects Proposals for our Open Lands.	Gulch road to our transportation department for consideration as they work towards improvements on the
Projects Proposals for our Open Lands. 1. I really like the ADA proposal from Joel Peden. This would be a wonderful addition to our trail system, for use by both those with mobility issues and by those who want to walk peacefully without the distraction and dangers from encounters with speeding bicycles. Perhaps you could separate bicycles from other users by a separate raised bike lane along the trail, or by restricting bicycle use to the road in Dry Gulch between the Eagle Scout trail and the parking area at the former shooting area. 2. Regarding the "Helena Hikes, Tony Jewett Trail Inventory, Assessment and etiquette project. I support this proposal and would like to see it implemented in 2022. This proposal should be funded and included with goals and a work plan for every year. There is a clear need for this proposal. The city needs to get a complete inventory of both the system trails, the illegal user created trails and those routes that pre—date our Open Space program. Surely there is a need that once this inventory is completed that many routes should be obliterated and returned to	department for consideration as they work towards improvements on the road corridor. 2) This proposal. If adopted, will be implemented over several years and will need to secure funding. We do have an extensive inventory of our trails, including user-created or non-system trails. This proposal is focused on a functional assessment of our existing trail inventory and system. 3) Thank you for your comment. This will be addressed as a specific budget item, likely over several budget cycles. HOLMAC, at this point, will continue to serve as the advisory group for open lands projects such as this and although there is much appreciation for the efforts by specific members of the
natural conditions. Going forward a complete trail inventory will be useful in identifying where new trails might be useful and where there should be no new trails. 3. Whyte Acquisition Trail Improvement Project. The City should develop a multi— year work plan for this Open Space addition. Each year the proposals should be listed as "Major Projects" and be open to public comment and dialog. I would like the city to use Goal 2 of the Helena Open Lands Recreation plan as a guiding principle for this property. Please do not put up a bunch of "Ecological Informational Foo Foo signs. Total waste of money and they become the targets of vandalism. For each proposed project on the Whyte property you need to engage more that mountain bikers. Include walkers, and hikers and runners in the discussion. Engage	community to attain this land, it is now public land to be managed as such for entire community, not specifically for those who were instrumental in funding the acquisition.

			also those important people who were instrumental in getting the Whyte property in public hands.	
			That is all.	
11.09.2021	Eric Grove	eric@greatdividecyclery.com	City Open Lands Proposed projects 2022	Helena Open Lands System Major Product - City staff have recommended
			Upper DeFord Trail - North and South of Old Shooting Range	moving the Tony Jewett proposal
			Comment - I support this project as recommended by city staff.	forward with the clear understanding that each item identified in the
			Whyte Acquisition Trail Improvement Project	associated product list will be analyzed
			Comment - I support this project as recommended by city staff	to determine how and when they will be integrated into the annual City of
			Helena Open Lands System Major Project - Tony Jewett	Helena, MT Open Lands System work
			Comment - I'm in agreement that a comprehensive inventory and holistic	plan.
			assessment of our Open Lands Trail System would be helpful for future	2) Alternative Proposal to the DeFord
			planning. I can also see the merit of a more determined effort to close	Improvement Project – Although City
			social trails and educate users on trail etiquette. However, I'm concerned	staff have chosen to support all of the
			that this proposal has other goals which are not well defined and not	items contained with the DeFord
			congruent with this public process. To be clear, I would wholeheartedly	Working Groups list of
			support P&R staff, PPLT staff and/or a volunteer working group;	recommendations, two elements found
			Working collaboratively to develop a trail assessment checklist	within the Alternative Proposal,
			based on objective, technical factors that are universally recognized	specifically the consideration of an
			by land management agencies as important for a multi-user	electrical charging station at the Old
			(pedestrian and mountain bike), non-motorized recreational trail	Shooting Range Trailhead and
			systems. The checklist would provide a basis for objectively	exploration of ADA parking at the
			assessing individual trails for sustainability, safety, and enhanced	Archery Range were added due to their
			user experience for everyone. Assessment factors (in no particular	compatibility. Additionally, signage
			order) should include trail intention and purpose within the larger	installation related to recommended
			network, average grade, maximum grade segments, water	bike routes and pet management were
			management features, outslope, backslope, how well the trail fits	also included within staffs
			into the terrain, width, surface condition, overall condition, sight	recommended DeFord proposal to
			lines, and turn design in addition to others.	insure that all elements contained
				within the Alternative Proposal that did

Over the next two years, perform an updated inventory utilizing	not conflict with the DeFord Working
"teams" of volunteers from the 3 identifiable user groups and PPLT	Groups recommendations were
staff. Utilize the existing inventory framework as a starting point to minimize redundancy.	selected for inclusion.
3. Develop a scoring system based on this assessment to help	
prioritize trail restoration projects. When considering a restoration	
plan for any given trail, compare the assessment for any given trail	
against current, best practices to develop a restoration strategy	
that can be presented for major project consideration in the annual	
work plan.	
4. Inventory and develop a "hit list" of social (illegal) trails to be	
aggressively closed and obliterated. Commit to closing a certain	
number every year.	
5. Collaboratively develop an etiquette education strategy that also	
emphasizes courteous trail behavior.	
This seems relatively straight forward, could be implemented over a	
number of years, and serve as an educational exercise for	
user/volunteers to better understand the elements of good trail design	
for a multiuser system like ours.	
That being saidWhile I appreciate Tony bringing this core concept	
forward, I'm not quite clear whether any of the proposal qualifies as a	
"major project" under the chapter 7 public process? Perhaps this is	
because it, in part, seems vague in its intent, has no clear budget and	
appears more like a directive then a "shovel project". However, If the	
purpose of the proposal is simply to compel the city (and PPLT) to	
embark on a more robust trail inventory, commit to closing social trails,	
and create a more comprehensive trail etiquette strategy then I'm	
cautiously supportive (still not sure this is the appropriate avenue but	
agree these things need to be done).	
My primary concern with the proposal is that it also seems to suggest a	

de facto policy change in how projects are selected/implemented through the community agreed upon and Commission approved public process. Phrases and words in the proposal such as "framework based on need", "city to reframe its priorities", "de-emphasizes unnecessary trail and infrastructure expansion" are subjectively based and could easily be construed as attempting to establish a moratorium on any proposals that include new trail construction. I definitely don't believe this part of the proposal belongs in this particular public process...much less as a "major project". Adopting these elements would be effectively rewriting the public process and, in my opinion, that's not acceptable without a separate, robust, and transparent public process.

In summary, the current inventory is a good annual maintenance tool but, like Tony, I don't believe it goes deep enough for long term planning. Our trail system evolved organically with very little thought for the overall product. The result is that most trails in the system, even those recently constructed, rarely conform to current standards for quality, multiuser trails. Compiling more technical information on our trail system, closing and obliterating social trails and developing a more comprehensive trail etiquette education program are all things I can support. However, while I personally believe we could spend the next decade bringing our current trails into compliance with best practices. I don't believe those restoration projects should necessarily supersede new project proposals (or vice versa). All projects presented for the annual work plan should be based on their merits, period. And finally, implementing a de facto moratorium on new projects would not only betray the current public process but it could also hinder future opportunities for our community to enjoy our open lands.

Alternative proposal to the DeFord Improvement Project Comment - My understanding is that the DeFord Improvement project proposal was the product of a collaborative effort (although not requiring

consensus) which I support. This proposal is not and yet it represents a significant change to an existing trail with long term, historical use. Because of that fact I have the following concerns and cannot support this proposal. 1. It is not the product of a collaborative effort with all stakeholders who have historically used the trail. 2. It proposes to eliminate mountain bike access to a trail that the
than any other recreational groupnearly 40 years. Again without any engagement. 3. It doesn't propose an alternative, safe, single track replacement for displacing a user group from an existing trail. 4. This approach only adds to divisiveness. With the exception of the Powerline Trail (pedestrian only), Helena's South Hills trail system has never excluded an allowed user group. Groups desiring exclusive use should propose new trail construction rather than exclusion. Examples of this better strategy include the Directional Trails (although they don't exclude pedestrians) or the new "ADA" trail on Mount Helena. Neither displaces historic use from an existing trail. 5. It doesn't bring a funding source with it. I realize this isn't a requirement of submitting a proposal but, considering limited city resources, it should be a consideration when any individual or group brings forth a proposal. At the very least, groups or individuals should be required to bring partial or in-kind funding (volunteer hours) with their proposal. Thank you for considering my comments.

Additional Comments: Updated 11.17.2021	
Dear Mayor and Commissioners- We attended the November 9 th Helena Open Lands Management Advisory Committee and came away with several deep concerns. The three newest appointees were eager to disregard the consensus recommendation of the DeFord Working Group. As you know, this Commission established the Working Group during last year's major projects planning process. Instead, these HOLMAC members showed great interest in an alternative proposed by dissenting members of the Working Group. The difference between the proposals is that the alternative eliminates bicycle use on the southern portion of the DeFord Trail (between the archery range and Dry Gulch – created by Commission as a linear city park for bicyclists and hikers by resolution in 1999). It is disturbing that these three HOLMAC members see displacing an existing use from an established trail as appropriate, and that shifting bicycle use to a county road as an acceptable remedy. On top of that, most of the displaced bicyclists would be children. We are entirely in favor of more accessible trails. We feel that Helena Open Lands should provide more opportunities to underserved groups. We support developing pedestrian-only trails where appropriate. However, exclusive use trails should be added to the system, not carved out of existing uses. The three most recent appointees to HOLMAC have come with a clear agenda. It's apparent in their questions and attitudes towards public comment and City staff. Further, their lack of preparation and general	Thank you for your comments – City staff is recommending the working group proposes specific to the DeFord Trail improvements.
info@montanabicycleguild.org	Dear Mayor and Commissioners- We attended the November 9th Helena Open Lands Management Advisory Committee and came away with several deep concerns. The three newest appointees were eager to disregard the consensus recommendation of the DeFord Working Group. As you know, this Commission established the Working Group during last year's major projects planning process. Instead, these HOLMAC members showed great interest in an alternative proposed by dissenting members of the Working Group. The difference between the proposals is that helaternative eliminates bicycle use on the southern portion of the DeFord Trail (between the archery range and Dry Gulch – created by Commission as a linear city park for bicyclists and hikers by resolution in 1999). It is disturbing that these three HOLMAC members see displacing an existing use from an established trail as appropriate, and that shifting bicycle use to a county road as an acceptable remedy. On top of that, most of the displaced bicyclists would be children. We are entirely in favor of more accessible trails. We feel that Helena Open Lands should provide more opportunities to underserved groups. We support developing pedestrian-only trails where appropriate. However, exclusive use trails should be added to the system, not carved out of existing uses. The three most recent appointees to HOLMAC have come with a clear agenda. It's apparent in their questions and attitudes towards public

			Mr. Mayor, you and the Commissioners have stated concerns over the rising temperature of discussion over Open Lands recreation planning. In fact, we remember the commission meeting when Mayor Collins said he'd learned an important lesson: "Don't mess with Helena trails." Unfortunately, these recent appointments to HOLMAC are members willing to disregard consensus and process to displace existing uses. This will result in more Commission time spent listening to your upset constituents and Helena citizens. There will be a new vacancy on HOLMAC following Eric Feaver's election to the City Commission. We urge you to consider this appointment carefully. We think it's worth noting that there are no appointed members younger than 50, and none with active knowledge and experience of the HOL trail network. Finally, we hope that Parks & Recreation Department staff will still follow the Commission's direction and present to you the DeFord Working Group's consensus proposal, even without HOLMAC's recommendation. It is a well-thought-out solution arrived at by multiple user groups. It expands opportunities rather than eliminating them. It has our full support.	
11.15.2021	Eric Peterson	e.mpeterson@yahoo.com	Thank you Dear Parks and Rec and Helena City Commission,	Thank you for your comments – City staff is
11.13.2021	Life i etersori	Campetersone yanoo.com	I am writing as a Helena mountain bike coach. We currently have around 80 kids and 50 licensed coaches that are in our local NICA (national interscholastic cycling association) program. We started with 15 kids 3 years ago and now have almost 100. Pretty remarkable. These kids range in ages from 6th grade through High School. At a time when so many kids are on social media and having a hard time coping with the pandemic it is really neat to see so many of our kids here in Helena using the Great outdoors and biking is a great way to do that. I am deeply concerned that there is a proposal to shut off the DeFord trail to bike users. It would force many of our kids, not to mention the hundreds of other riders, to use the Davis Gulch	recommending the working group proposal specific to the DeFord Trail improvements and considering potential accessibility infrastructure on the Whyte Property.

			road which would be very dangerous with the amount of cars flying up and down that road. That trail has been used for years and years by bikers and I think it would be a great shame to close that off. I am also concerned about rumors floating around with the newly acquired Whyte property and closing that off or at least sections off to bikers as well. From what I remember that land was a Prickly Pear Land Trust acquisition and many of the prickly pear donors are people that heavily support biking in our community. To have them donate to such a cause and then close it off to them seems a bit of a slap in the face.	
			Thank you for considering my feedback for what it's worth. These are great	
			kids and it is a really neat program. We use Davis Gulch primarily for our	
11.15.2021	Michele	michele.na.mt@gmail.com	practices. Thank you, Coach Eric Peterson Dear Parks Department,	Thank you for your comments, the 2021
11.13.2021	Webster	meneremannt@gman.com	bear rans beparement,	work plan is posted to the website at:
			I appreciate this opportunity to comment on the Major Projects proposed	https://www.helenamt.gov/fileadmin/user
			this year. I also want to express my gratitude for the decision to not go	upload/Parks/Documents/Open Lands Doc
			forward with the "ADA" trail extension on Mount Helena. As you know,	uments/Open Lands General Documents/
			this proposal did not have adequate support in our community and was	2021 Maintenance Work Plan -
			not needed. I also wonder when the Lime Kiln Parking Lot, approved for	Combined.pdf
			work last year, will be started and completed. Is someone following up	
			on the progress on last year's projects? Is there a place on the website	
			where we can see a summary of the updates?	
			DeFord Project: I support the Peden Alternative. It is essential that mobility and sensory impaired people have a safe trail so they can enjoy our open lands. A Shared-Use Trail is not acceptable because bicycle traffic will make it unsafe for people with disabilities. At this time, the mountain bikers have four trails (3 bike parks with two trails on the bike park near the top of Mount Ascension) where they can shred and practice their skills. While hikers are not prohibited on these trails, most know these areas were created for mountain bikers and not a suitable	

Park was a rogue development that at one time city staff planned to demolish and return the land to its natural state. This still seems like a good idea to me. There must be consequences for people and groups that chose to build rogue constructions on our public lands if this practice is going to be stopped.

People who are unable to utilize the majority of our trails because of an impairment need areas set aside for their use. It is only fair. And, that is why approving the Peden Alternative is greatly needed. I would refer

impairment need areas set aside for their use. It is only fair. And, that is why approving the Peden Alternative is greatly needed. I would refer readers to the comments submitted by Lisa Bay regarding Universal Access guidelines and other issues. Because this is her area of professional expertise, her opinions should be given considerable weight. This project was initially submitted to provide a relatively flat, safe trail for the mobility-impaired. Unfortunately, it was evident to me when the Working Group was formed that the membership did not equitably represent all interest groups and the desires of the mountain bikers to promote their agenda would likely prevail. Due to that reason, the recommendations of the group should be viewed with skepticism.

Helena Hikes Trail Inventory Assessment: This is greatly needed and I support this project whole-heartedly. We are seeing increased use and conflict on our trails. Rogue development of new trails is a huge problem. We must get a handle on this and assess the ecological consequences of these changes. This project should be prioritized with annual funding. It does not make sense to build new trails when we don't really know what currently exists.

A new Work Plan is needed and should be a priority for 2022. HOLMAC representatives historically have primarily focused on their special user group interest and this must change. We need a citizen's advisory group where members share a common goal of stewardship and, ideally, have expertise in resource management. We need more focus on

			preservation of our lands and protection of the flora and fauna that cannot speak up for themselves at public meetings. Whyte Property Improvement Project: I generally support this project, but I think priority must focus on trial obliteration and trail rehabilitation prior to focusing on new trails. Because of the scale of this project, a multi-year work plan is needed. Projects will need to be brought forward as "Major Projects' each year so that the public is always informed and involved in discussions. Stewardship should be the guiding principle. Thank you for the opportunity to comment.	
11.15.2021	Joe Schmechel	joe.schmechel@gmail.com	Hello, I am writing to give my strong opposition to the new trail management plan for the DeFord trail eliminating mountain bike usage, and restricting dogs to leash only. This is a clear example of a solution in search of a problem. The compromise offering is clearly the better alternative. Thanks, Joe Schmechel	Thank you for your comment.
			BE HEARD COMMENTS: UPDATED 11.17.2021	
10.31.2021	Fran Penner-Ray	Not available	The Whyte addition trail changes are complex and necessary. It's a confusing web of trails there now. The planned trails look reasonable and the acknowledgement of existing uses is important. I support removing the MT Helena ADA trail from project consideration. I initially expected the wide trail to end at the picnic table view point next to the old water tanks. My mother was in a wheelchair and I've pushed strollers. Le Grande Cannon, Centennial trail, Spring Meadow and Ten Mile Creek offer ADA options. The wide crushed gravel section of the Ambrose trail is a scar on the mountain and an unnavigable due to the slope for wheelchairs. A loop is unnecessary and I'm concerned ATV's will see it as road access to MT Helena. This is a project which went too far.	The Mount Helena ADA trail is almost complete with some final construction slated for the spring. Phase 2 of that project was removed from consideration earlier in the process based on public comments received. Recreational ATV use is not allowed on Helena Open Lands.

11.12.2021	Ben Carreon	Not available	I am disappointed to hear that three HOLMAC members decided	Thank you for your comments – We believe
11.12.2021	Bell Carreon	Not available	to oppose the City Commission created DeFord Working Group's	the document link has been fixed and City
			consensus plan that has been in development over the last year.	staff is recommending the working group
			·	
			This an overreach by the dissenting HOLMAC members and	proposal specific to the DeFord Trail
			undermines the best alternative for all user groups put forth by the	improvements.
			DeFord Working Group. I could not access the highlighted changes	
			to the Appendix P plan due to a broken link on the City website;	
			however, if the above comment reflects the actions of the three	
			HOLMAC members, my comment stands. Please reinstate the	
			Parks and Rec Department's recommendation for the DeFord	
			Working Group's consensus plan. Thank you for the opportunity to	
			comment.	
11.12.2021	Jayson O'Neill	Not available	I encourage City of Helena Commissioners, the parks department,	Thank you for your comments – City staff is
			and other relevant city boards to support DeFord Trail Working	recommending the working group proposal
			Group's consensus plan. Closing trails to bikes on DeFord Trail	specific to the DeFord Trail improvements.
			south would create serious safety issues for biking families and	
			their children. The trails original intent was to protect all trail users,	
			including bikes, from vehicles. Davison Road is a winding road with	
			limited line-of-sight for drivers. Protecting all trail users from the	
			potential dangers of Davis Road traffic is in the interest of the City.	
11.12.2021	Noah Bodman	Not available	I support the multi-use plan that was developed by the workgroup. I	Thank you for your comments – City staff is
			don't support any plan that bans bicycles from trails or paths where	recommending the working group proposal
			they were previously allowed. While I don't live in Helena, I do	specific to the DeFord Trail improvements.
			travel to Helena to ride bikes, and I've ridden in the areas at issue	·
			in these proposals. Helena has a reputation statewide as an	
			excellent bike destination, and I feel that the proposals that would	
			ban bikes are in direct opposition to what the City has developed	
			over the last two decades. The idea to ban bikes feels like a kneejerk	
			reaction based on individual biases, whereas the multi-use	
			workgroup developed a solution that actually assessed the area	
			and arrived at a worthwhile plan that benefits everyone. As a side	
			note, if there is a contingent that feels they need a trail or path that	
			excludes bikes, the proper response is to build a new, foot traffic	
ı			Excludes bikes, the proper response is to build a new, root traffic	

11.12.2021	Mike Stem	Not available	only trail rather than simply banning bikes from a trail they have been using for years and trying to push that traffic onto roads. Thanks for your consideration, Noah Bodman As someone who regularly mountain bikes in the Davis Gulch area I strongly oppose the idea to bar bicycle use from the DeFord trail. The alternative for a directional and separate trail is clearly the logical solution. The idea that a bike lane can be added to the gravel Davis Gulch road is nearly laughable. Bikes are not the	Thank you for your comments – City staff is recommending the working group proposal specific to the DeFord Trail improvements.
11.13.2021	Coleen Street	Not available	The proposed HOLMAC proposal to ban bikes on southern part of DeFord Trail is unbelievable. Approximately 10 years ago, DeFord Trail was built as a safety concern of families riding on Davis Gulch Road with children. DeFord trail is for all users especially children. To ban bikes on a trail in existence resulting in children on the road with vehicles could result in tragic event. The City is also looking at the Whyte property which was given to the City of Helena for public recreation by all users. There is now a proposal by HOLMAC to establish a lower angle trail that would not allow bikes. Enough is enough - the bike trails have been in existence on both Mt Helena and Mt Ascension for over 50 years. There is so much division in this country now and it appears HOLMAC wants to foster disagreements between user groups in Helena. I mountain bike and hike. I have never had a problem with hikers when riding my bike. If you are courteous to the other person they respond positively. If HOLMAC continues to go against the consensus of all users and pits one against the other. It needs to stop. Has anyone reached out to Prickly Pear who gave the Whyte property to the City? I wonder after all of this if they will be willing to donate land to the city for use by all. The trails for all uses, in turn promotes local businesses thru visiting tourists and user groups. I am a City of Helena resident, born and raised in Montana. I pay taxes to the city. I do not live in another state or county and try to influence the City and not pay the appropriate taxes or just recently moved here.	Thank you for your comments – City staff is recommending the working group proposal specific to the DeFord Trail improvements.

My taxes in part fund the trails on Mt Helena and Mt Ascension as well as my donations to Prickly Pear and other user groups. I	
well as my denations to Prickly Pear and other user groups I	
would like the City of Helena to listen to the consensus group of all	
users that brought forth a proposal, not HOLMAC now and in the	
future so this can be put to rest. The trails are for all users. If ADA	
trails are requested by handicapped individuals that is wonderful.	
New trails should be constructed with the guidance of the	
individuals who would use the trail so it is constructed property.	
Any changes to the design would be run by these user groups prior	
to implementation. In closing, please listen to the proposal offered	
by the consensus of user groups. Let's stop this division being	
instigated by some members of HOLMAC. Coleen Street	
11.14.2021 Nathan Liechty Not available I wanted to take a moment to reach out in regards to the Thank you for your	comments – City staff is
discussion regarding the DeFord Trail changes. For context, I am in recommending the	working group proposal
the final year of nursing school up in Great Falls, MT. A large part specific to the DeFo	rd Trail improvements.
of why I became I nurse is that it gave me the freedom to move	
just about anywhere in order to settle down and build a career.	
During my time in Great Falls, I've been coming to Helena quite a	
bit to explore the city's trail system, catch some music in the park	
or grab a beer and some dinner. I've been incredibly impressed by	
the trail access from town and the collaborative and supportive	
spirit of the community that built those trails. It's a big reason why I	
think there is a good chance I could end up in Helena after I	
graduate. I would encourage you to adopt the solution proposed by	
the multi-use working group that would see the DeFord trail	
widened and a bike-only singletrack trail developed. This solution	
would improve access for different mobility or sensory abled	
groups, improve bike access to the features built nearby and do	
wonders to ease congestion for what will hopefully continue to be a	
pleasantly busy stretch of trail. The working group plan	
accomplishes these goals without the need go backwards by	
eliminating bike access to a trail. The working group plan is well	
thought out, considerate of multiple user groups, achievable and	

			rooted in collaboration. All the values that have made the Helena	
			trail system such a stellar example of a city-lead project and a	
			huge part of what will continue to draw people such as myself to	
			the city. I would strongly urge the city to continue that collaborative	
			spirit and adopt the working group plan. Thank you, Nathan	
11.14.2021	Michele	Not available	I support the proposed changes. The disaster regarding the ADA trail on	Thank you for your comment.
11.14.2021	Webster	NOT available		mank you for your comment.
	webster		Mt. Helena could possibly have been avoided if there had existed more	
44 44 2024	F : C:	N. 1. 11.	checks and balances in the implementation process.	T
11.14.2021	Eric Sivers	Not available	Upper DeFord trail (North of the Old Shooting Range parking lot) –	Thank you for your comments.
			Brad Langsather, Presenter I support this project as proposed. This	
			is a long-awaited and commonsense project that benefits all trail	
			users. Upper DeFord trail (South of the Old Shooting Range	
			parking lot) – Brad Langsather, Presenter I support this project as	
			proposed. Mount Helena ADA Trail Construction Project – Brad	
			Langsather, Presenter I understand the reasoning behind not	
			moving forward with this project. However, I think that it would	
			have been an ideal time. Public interest and engagement over this	
			project would be at an all-time high, and significant outside funding	
			has already been raised specifically for this project. Whyte	
			Acquisition Trail Improvement Project – Brad Langsather, Presenter	
			I support this project as proposed. Kudos to Prickly Pear Land	
			Trust for a well-thought out review of the existing network and for	
			good recommendations. City Of Helena Open Lands System Major	
			Project – Tony Jewett, Presenter I am in favor of a detailed trail	
			network inventory and assessment (I recommended one in 2020).	
			However, I see several issues in the proposal submitted by Tony	
			Jewett. The most significant issue is that the "request for the city to	
			reframe its priorities" is a major policy proposal that is inappropriate	
			for this process. Ironically, his preferred policy suffers from the	
			problem he sees in current HOL management. He proposes a shift	
			to prioritize conservation, but without any identified goals,	
			framework, or metrics. Conserve what? Where? How? These	
			metrics are undefined. Alternative Proposal to the City's 2021	

			DeFord Improvement Project, Joel Peden – Presenter I oppose this alternative proposal. This alternative differs from the City's recommendation in only one aspect: bicycle use on DeFord trail	
			between the Old Shooting Range parking lot and Dry Gulch. This alternative proposal recommends displacing bicyclists from an	
			existing trail and creating a bicycle lane on Davis Gulch Drive for	
			this displaced use. Davis Gulch Drive is a gravel-surfaced county road. It's unclear how the City Parks & Recreation Department	
			could take this action. Further, the bicyclists who would be	
			displaced onto a county road by this proposal are predominantly	
			children. I wholeheartedly support increasing access to the HOL	
			system by providing opportunities for underserved groups.	
			However, these opportunities should be added to the system, not	
			made by eliminating longstanding uses.	
11.16.2021	ECN	Not available	It is disappointing and astounding that there are members of this	Thank you for your comments – City staff is
			community that feel the need to exclude a paltry 2000 feet of trail from	recommending the working group proposal
			bikers, who would subsequently need to use a dirt road. This road is full of blind corners and puts increased risk of injury or worse in a biker vs.	specific to the DeFord Trail improvements.
			car/truck accident. The upper DeFord trail is used by many, including	
			school age children so that they don't have to ride on a dusty, narrow	
			road with swiftly moving cars. How individuals can propose such a	
			situation is unconscionable. Please consider a plan that reduces	
			unnecessary risk. If a user group would like exclusive use of a trail or	
			system, then we need to build those trails, not prohibit a particular user	
			group on an existing trail. Thank you.	
11.15.2021	Kristin Berry	Not available	I am extremely disappointed with HOLMAC's rejection of the consensus	Thank you for your comments – City staff is
			plan on the DeFord trail. The consensus plan was created with many user	recommending the working group proposal
			groups coming together to agree on needs for the DeFord trail. The	specific to the DeFord Trail improvements.
			HOLMAC group's rejection of the plan in favor of a plan submitted by	
			dissenting members flies in the face of the process our city laid out and	
			the voices of many members of our community. The DeFord trail was created to take bikes off of Davis Gulch. I am in favor of creating new	
			limited use trails that are for walkers only, but not in removing access to	
			I milited use trails that are for walkers only, but not in removing access to	

11.15.2021	Eric H	Not available	exiting trails. Putting bikes back onto Davis Gulch is dangerous. Many bikers use DeFord as an uphill trail to get to the old archery range trailhead. Its easy grade also makes it a great trail for children. Removing bike access would have a huge impact and create dangerous situations; wholly inappropriate and unnecessary. Please reconsider the needs and voices of our citizens. Making kids on bikes ride up and down Davis gulch road is absurd!	Thank you for your comments – City staff is
11.13.2021		The definition of the second o	Whyte Property is best if all trail users are welcome.	recommending the working group proposal specific to the DeFord Trail improvements.
11.14.2021	Micahvitoff	Not available	The recent proposal by Holmac on the south hills Davis gulch areas proposal to ban bikes from the DeFord trail is unacceptable. The trail is used by adults and children as a SAFE route to get up and down the gulch. Moving bicycle traffic onto the gravel road will only provide a dangerous situation for children and adults. Davis Gulch road had blind corners and fast drivers. Any proposal to eliminate trail use by one specific group is unacceptable. We have a great system of OPEN lands in our multi use system and we need to keep it that way.	Thank you for your comments – City staff is recommending the working group proposal specific to the DeFord Trail improvements.
11.13.2021	Brian Norderud	Not available	Thanks for the opportunity to comment. I am writing to let the Helena City Commission and Helena Parks and Rec Department know that I am in support of the consensus plan for the DeFord Trail. I am concerned, and I oppose the recent action by three HOLMAC members who want an alternative calling for a bike ban on this section of DeFord trail. Displacing more bike users onto the road in this portion is not a good idea from a logistical and safety standpoint. I run, walk, bike in this area and do not like being on the road very much. Allen described it well below. This trail was created specifically in 2001 to keep traffic and other users more separated. DeFord should continue to serve that role with the consensus plan to move forward in line with input received through the open lands process.	Thank you for your comments – City staff is recommending the working group proposal specific to the DeFord Trail improvements.

seeks to cut access. The alternative supported by HOLMAC members, if successful, would ignore the process created to address multi user needs for this area and that is not okay. I strongly urge the City of Helena Commission and Parks and Rec to reject the Holmac members call for an alternative. It is not appropriate The Whyte Property development is a significant achievement for expanding our open lands. I support the efforts to ensure that bikes have access to this great trail network and it is important to develop it as Allen shared to improve trail experiences for everyone. I urge decision makers in this matter not to be swayed by HOLMAC members seeking to restrict access or say that accessible trails mean no bikes. Any efforts to cut out bike access should not be considered because it's not in line with the community values and outdoor access spirit Helena has. Our trail resources are amazing. The majority of trail users share the trails without issue and are respectful to one another. I enjoy our trails because I get to interact with the community. I am a multi-use trail user and I've had some of my best experiences in life sharing the trails with my family and friends in multiple roles like hiking, running, biking etc. The consensus plan best supports a diverse group changes and will grow. Helena already does great working together to share our resources and I know that people can continue to respectfully coexist and enjoy the trails.
--

			Thank you for your consideration in this matter and accepting comments for inclusion into this process. Take care.	
11.01.2021	Robert Ray	Not available	Upper DeFord Trail- get rid of idea of power for electric wheel chairs at Old Shooting Range. Everything from there goes up! Not appropriate for wheelchairs. too much \$\$\$ for what?	Thank you for your comments.
			Mt Helena ADA extension trail- Phase II - DROP!!! Inappropriate for open space "un-developed park", enforcement issues, trail grade, need for "rescue" concerns, etc. Find a better site and appropriate "substrate" for wheelchairs/ electric carts, (electric bikes???)	
10.22.2021	Allen Lloyd	Not available	The DeFord area is a main artery for the South Hills trail system.	Thank you for your comments.
			Providing reasonable options for all trail users should be the main goal. The road in this gulch is narrow, curvy, and busy this is a terrible place for people to travel be it on foot or bike. The trail in this area is already quite wide and the bottom of the gulch	
			provides ample space for a diverse set of trails to provide options for trail users.	
			If Brad Langsather's and Joel Peden's projects were combined it could be possible to provide options for most trail users. Using the available land to create multiple trails would spread the usage and allow for the different users to enjoy the space in their preferred way.	
			The Whyte property provides a great opportunity, but it is currently a spiderweb of community trails that creates confusion and does not provide a very good trail user experience. I would encourage the city to consider the climbing grade of the trails in this area to provide for an easy climb up the mountain.	
			In closing, I would encourage the city to approach these projects in a way that recognizes the diversity of trail users we have in Helena. As the city grows we will have more of this diversity, not less. It is the responsibility	

11.20.2021	Kristy Moeller	Not available	of all residents to recognize that we share this wonderful resource and the best way to protect it is to respect our fellow trail users. My family enjoys visiting Helena to bike the local trails. Bike tourism brings money to Helena as we eat dinner and often stay at a local hotel. I is unreasonable to block bikers from 2,000 feet of trail to force them onto a busy road. You are asking me to put my children in harm's way for	Thank you for your comments — City staff is recommending the working group proposal specific to the DeFord Trail improvements.
			minimal gain. Helena is a fun hiking and biking destination and access to kid friendly trails is key. Please consider a plan that minimizes risk to bikers and children.	
			OTHER COMMENTS: UPDATED 11.22.2021	
11.22.2021	Derek Sullivan	derekmsullivan@gmail.com	To whom it may concern,	Thank you for your comments – City staff is recommending the working group proposal
			Please accept this email as my comments on the DeFord Working Group Plan and the Whyte Property Plan.	specific to the DeFord Trail improvements.
			I support the Parks and Rec Departments recommendation to implement the DeFord Working Group's consensus plan. I strongly reject HOLMAC's	
			alternative proposal that bans bicycles from the southern half of the	
			DeFord trail. This alternative proposal would create an unprecedented situation in the South Hills trail system by discriminating	
			and excluding an entire user group from an existing, multi-use system	
			trail. While I support use-specific trail conditions, these conditions should only be implemented on NEW trails, constructed by the user groups that	
			propose such trails. We should never exclude a current user group from	
			an existing trail. I encourage Parks and Rec to reject HOLMAC's proposal	
			of banning bikes, and implement the Working Group's Consensus Plan. The working group was established by the City Commission to engage the	
			public. This important, democratic process should not be hijacked by a	
			vocal minority who wish to discriminate against certain user groups. This	
			would establish a dangerous precedent in managing our public lands and	
			should be strongly rejected.	

			Regarding the trail plan for the Whyte Property and the comment received suggesting direct consultation with donors of the purchase: I strongly reject the concept of weighing donor input greater than public input. All comments received are valid; however, none should carry more weight than others. Establishing a quid pro quo situation where a donor can leverage private dollars to dictate how public lands should be used should be firmly rejected. This classist system would transfer the oversight and management power from the people of Helena to a wealthy few, the antithesis of the work the Commission and Parks and Rec have done to improve public engagement of managing the trail network. Please let me know if you have any questions regarding my position on	
11 22 2021	Tama lassitat	1	these issues.	The other section and the sect
11.22.2021	Tony Jewitt	tonyjewett1@gmail.com	Dear Director Ponozzo, Mayor Collins and City Commissioners, and City Manager Harlow-Schalk:	Thank you for your comments –
			Wanager Harrow Schark.	DeFord Trail: City staff is recommending the
			The following comments are submitted in reference to the Major Projects	working group proposal specific to the
			being proposed on our open space lands in 2022.	DeFord Trail improvements. City staff has
				added two additional elements to this
			DeFord Trail/Peden Alternative: I urge the Department and City	proposed projects based on the Peden
			Commission to adopt the Peden Alternative, not the city's proposal on	proposal.
			rehabilitation of the DeFord Trail.	
				Whyte Property Project: This project, as
			The Department's preferred alternative evolved out of a working	discussed and proposed by staff, will need to
			committee that many feel was unbalanced in its makeup and that lacked any true disability representation. The proposed alternative fails to meet	be implemented over several seasons and will be included as part of the City's work
			Universal Access (UA) guidelines – the accepted gold standard for	plan.
			mobility and sensory impaired recreational use. Members of Helena's	pian.
			disabled community favor the Peden Alternative over the city's	Trail Inventory: This project, as discussed
			recommendation because the Peden proposal offers a safe, enjoyable	and proposed by staff, will need to be
			and accessible recreational experience for them.	implemented over several seasons and will
				be included as part of the City's work plan.

Helena's 75 mile trail system has extensive opportunities for hikers and cyclists, but there are currently no trails whatsoever built for mobility/sensory challenged individuals and pedestrians. The Peden Alternative would address that void and become the first trail in the system unencumbered by competing uses that infringe and compromise the activity of the impaired. The Peden Alternative offers a pedestrian only trail experience not available for bicycles.

The City does not have the capacity to form an additional advisory group specific to this project – HOL has HOLMAC to serve as an advisory group for over-arching HOL projects.

It is important for the Department and Commission to understand that this alternative <u>does not foreclose</u> any plans to re-build and make safer the existing bike course on DeFord. <u>Nor does it prevent</u> the city from routing bike traffic onto a safe, adjacent off-road trail for both up-trail and down-trail traffic all off-road of Davis Gulch. Design alternatives exist and can be easily put in place that afford a <u>safe and enjoyable option for</u> all users.

Whyte Acquisition Trail Improvement Project: I support the Whyte property project and urge the city to provide the necessary funds to implement it. This landscape level effort represents the type of planning needed to provide a stable, accessible and properly conserved trail system in a distinct area of our open lands system. This project could be a forerunner and example of future open space management and trail planning – if properly implemented.

This is a large, multi-year project. It envisions new trails. re-routed trails, rehabilitated and reclaimed trails. It is a project that will garner significant public interest, and potentially controversy. It is additionally a project that could prioritize conservation and interpretation by through restoration of natural conditions in many areas and signage providing ecological interpretative and historical information of the area. Given the scale of the project and it's multi-faceted nature, it qualifies for and demands consideration as a set of multiple 'major projects'. I believe that the Department should build a multi-year work plan that forecasts

annually products to be completed and that are introduced annually to the public though a series of public meetings, on-site tours, and comment periods. Such an approach by the Department would build citizen awareness, buy-in, and ownership over the effort, quell the possibility of controversy, and result in a far enhanced final product. Helena Hikes Trail Inventory, Assessment and Etiquette Project Like the Whyte property project, the trail assessment, inventory and etiquette project is a large-scale multi-year effort designed to establish a baseline of information to be used in the long-term management of our open lands and trail system. In rolling out this project I would urge the City and Department of Parks and Recreation (DPR) to: 1) emphasize illegal trail obliteration, trail rehabilitation, and open lands stewardship in balance with new trails and other infrastructure considerations, and 2) create a work plan in 2022 that sets timelines, budgets and articulates clear goals for the project and a specific sequence of actions and projects for accomplishing the work plan goals, and 3) that the city consider establishing an objective, balanced citizen advisory group to assist in the work plan design and its project elements to include public engagement.
3) that the city consider establishing an objective, balanced citizen advisory group to assist in the work plan design and its project

			Thank you for this opportunity to submit these comments on the proposed Major Projects for 2022 open space lands.	
11.23.2021	Jake Gunther	jake.gunther21@gmail.com	Hello Parks and Rec staff, We are writing in strong support of the original City and DeFord Trail Working Group's recommendations for the DeFord Working groups recommendations for the DeFord Trail Improvement Project. The original DeFord Trail plan as recommended by the Working Group and City represents a best-case scenario which achieves significant strides to improve safety and ADA accessibility for pedestrians and cyclists.	Thank you for your comments – City staff is recommending the working group proposal specific to the DeFord Trail improvements.
			We do NOT support the Alternative Proposal to the City's 2021 DeFord Improvement Project as presented by Joel Peden which would designate DeFord as pedestrian only. We are shocked and saddened to hear that three vigilante members of the Helena Open Lands Management Advisory Committee (HOLMAC) would blatantly abandon their roles as fair representatives of the Helena community and are disheartened that the City would even consider such a proposal. It is wholly inappropriate to ban bicycles from an existing trail, and is egregious to propose to do so with the only alternative route being on a county road. The low-gradient trail leading south from the Shooting Range parking lot is an ideal place for beginner bicyclists and a safe place to climb the hill for riders of all abilities. Banning bikes from a safe route and forcing them onto the county road with vehicles traveling at speeds in excess of 45 mph on a washboard road is downright dangerous and absolutely unacceptable. There is no conflict between cyclists and pedestrians on the existing trail that we have biked and hiked many times over the years. Cyclist traffic almost exclusively climbs the trail and is inherently traveling at a slow speed as a result. There is absolutely no basis for banning bikes in this location or any other existing trail within Helena's open lands. Secondly, we would like to provide some feedback on the City's plan for	
			formalizing the trail network on the newly acquired Whyte property. This amazing acquisition by PPLT is a wonderful benefit to our trail system and	

r	1	T	,
		must be managed accordingly. It has come to our attention that some of the anti-bike crowd in Helena is mistakenly attempting to conflate the term "accessible" to mean "no bikes"; this fallacy is a thinly-veiled attempt to ban children and beginning bikers from the low-angle trails contained within the Whyte property acquisition. We strongly encourage the Parks and Recs department to ensure that all of the new trails within the Whyte property are accessible to both bikes and pedestrians, both now and in the future. Additionally, we would like to stress the importance of the Parks and Rec Departments outreach over the trails in this area (or any future acquisition) following the established public outreach process - it is critical that our City provides equal representation to all citizens and that we never allows rich donors to have a disproportionate influence on our open lands. Thank you for your time and consideration.	
		Bicycle use must continue on DeFord Trail for all proposed improvements. The DeFord Trail provides critical linkage for all users to access the Old Shooting Range parking lot from town. I am a mountain bike coach for our local NICA team and this is where our team congregates and meets two	recommending the working group proposal specific to the DeFord Trail improvements.
		times per week. Many kids, mine included, rely on DeFord Trail for safe passage from town to our practice location. Displacing bicycle traffic onto Dry Gulch is not appropriate and presents safety hazards for kids and motorists. One of our main tenants of instruction at NICA is to "Ride with	
		Respect." Coaches regularly stress the importance of this on all trails and specifically the DeFord Trail on their return to town. We will continue to do so. DeFord must remain open to all users. Thank you for your consideration.	

ATTACHMENT "A"

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 Universals 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.

ATTACHMENT "B"

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 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 looks 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 nonsystem 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.