Helena Open Lands Recreation Plan Update - Response to Comments

The City of Helena accepted public comments on the Draft Helena Open Lands Recreation Plan Update from November 20, 2019, to December 20, 2019. Comments were accepted via an online survey, via email, and via hard copy mail. Thirty-one people responded to the survey and we received two letters and one email comment letter. The individual comments are part of the project record.

Major comment themes have been summarized and responded to below:

(1) Many comments expressed concerns about the lack of detail in the plan, that it lacked specific deliverables, objectives and timelines.

Response: As stated in the plan, this plan is meant to guide not prescribe. The City of Helena envisions this plan to serve as a guide for current and future decisions. The City recognizes that uses and demands will continue to change over time. This plan sets out broad guidance and a collaborative process to equip the community's stewardship of HOL.

(2) One comment letter pointed to the area objectives in the 2004 plan and said the inclusion of area objectives similar to those for this plan would help clarify the decision-making process at the project level.

Response: The 2004 plan had area-wide objectives that were useful in the guidance for the growth of Helena Open Lands for the last sixteen years. Some of these area-wide objectives then further prescribed site-specific directives. Many of the area-wide objectives of the 2004 plan are reflected in the Goals and Objectives of the updated plan, however, the new plan's Goals and Objectives are recognizably more broad and applicable to all of Helena Open Lands, not just specific areas. For example, this plan guides broad goals and principles that will help HOL managers prioritize projects and work according to accessibility, connectivity, stewardship, and future needs and growth. It also sets-out a public process that all future major projects will undergo.

HOL land managers do recognize there may be an intermediate HOL planning piece, somewhere between this high-level planning document and the annual work plan. That planning piece may be what some consider a facilities master plan, a document that inventories all the facilities, trails, and infrastructure in the HOL system and sets more detailed plans for how those facilities (trails included) should be prioritized and when those facilities should be built, updated, and decommissioned. HOL doesn't currently have this type of planning document or process, but this plan does prescribe planning efforts similar like *1.1d Inventory current social trails and develop plan to adopt or remediate priority trails*.

- (3) Many commenters liked the broad approach and commended the process and outcome of the update. *Response:* Comments noted
- (4) Several comments expressed concerns about the lack of detail specifically related to the public process outlined in Goal 4.3.

Response: Goal 4.3 in the plan has been updated with following additional information: For major projects, the public input and impact disclosure process will consider similar state and federal processes that include input mechanisms such as public meetings, online comment opportunities, and public notices; the City will strive to adopt a more detailed public input and impact disclosure process by June 2020

(5) Several comments pointed to the need for a comprehensive evaluation or inventory of Helena Open Lands.

Response: The updated recreation plan identified areas of future study, specifically: *Updated inventory of HOL lands, including wildlife and habitat.* The city recognizes the need, specifically related to recreation, to update the inventory for social trails and has added the following language to Goal 1.1: 1.1d: Inventory current social trails and develop plan to adopt or remediate *priority trails.*

(6) Several comments noted that themes and goals related to "stewardship" and "conservation" were not appropriate in this chapter.

Response: While we recognize this is the chapter specific to recreation direction for HOL, stewardship is a guiding principle that informs our decisions and actions and helps to balance the environment and recreational use. We also recognize that it was challenging to update just one chapter of the HOL management plan because all of the chapters, and all management of HOL lands, are interconnected.

(7) Several comments noted that bike speed was specifically called out and identified as an issue and that this was inconsistent as other issues were not specifically called out.

Response: Section 5.2 has been edited to more broadly address user conflicts: *In instances of user conflict, develop mechanisms to report and remediate, such as increased HOL staff presence, signage and trail reroutes*

(8) Several comments noted the need to specifically add dogs as a goal or issue.

Response: Section 5.2 has been edited to more broadly address user conflicts, this could include conflicts with dogs: *In instances of user conflict, develop mechanisms to remediate, such as increased signage and trail reroutes*

(9) Several comments wanted to see motorized vehicle use specifically called out as prohibited on HOL.

Response: A sentence has been added to the introduction: Specifically prohibited on HOL is motorized and equestrian use.

(10) One comment asked why opportunities for increased trail connectivity are needed.

Response: Helena Open Lands are experiencing increased demand and as use continues to grow, it is important to analyze the current trail system to identify opportunities to connect trails to maximize accessibility and recreation experience and trail connectivity. Providing access to larger landscapes from our open lands relieves some of the user pressures our small amount of city open lands can receive.

(11) Multiple commenters wanted to see our Helena Open Lands recreation chapter recognize HOL as "frontcountry" lands.

Response: While we do not specifically refer to HOL as "frontcountry" lands in this document, HOL likely fit the definition of "frontcountry" because they "areas that are easy to access by vehicle and predominantly visited by day users" (Leave No Trace Center for Outdoor Ethics, 2016).

(12) One respondent wanted to make sure we emphasize the importance of HOL for physical activity for public health.

Response: We have added language to expand on 1.2a: Analyze current trail system to identify opportunities to connect trails to maximize accessibility, <u>physical activity opportunities</u>, and recreation experience