APPENDIX E: Public Comments





Public Comments During Review

April 5, 2019 – May 5, 2019

The Montana Pedestrian and Bicycle Plan (Plan) is the first statewide effort to address the needs of non-motorized users across the state. The Plan was developed by the Montana Department of Transportation (MDT) in coordination with other state and local agencies, stakeholders, and residents across the state. MDT's mission is to provide a transportation system and services that emphasize quality, safety, cost effectiveness, economic vitality, and sensitivity to the environment. Although the Plan primarily aims to provide consistency across MDT for considering pedestrian and bicycle modes on state owned and maintained facilities, it is understood that state facilities make up a small percentage of the overall public road miles in the state. As such, the Plan is intended to be utilized as a resource by both MDT and its partners as they work to fulfill the needs of pedestrians, bicyclists, and all who use the state's transportation system.

Multiple comments were submitted throughout the planning process. The comments contained in this document were received during the public review period of the draft Plan which ran from April 5, 2019 to May 5, 2019. **Table 1** presents the comments received and an action/response to the comment.

The Plan is intended to be a high-level policy-based plan and was written to be useable by MDT and its partners, including local jurisdictions, agencies, organizations, and individuals seeking to improve walking and bicycling in Montana. As such, the language in the Plan was thoroughly vetted through the Steering Committee to arrive at content that each agency could agree to in terms of feasibility, practicality, and within the confines of existing laws and regulations.

Many of the comments received advocate for stronger language, implementation timelines, and benchmarks, as well as identification of specific projects. Although each comment may not warrant a change to the Plan, they are still important to consider as Montana moves forward to improve walking and bicycling in the state.

Table 1: Public Comment Response Matrix

ID	Date/Name	Comment	Response
01	4/11/2019 Danae	After reviewing the Draft Montana Pedestrian and Bicycle Plan, I have the following comments:	Thank you for your comment.
	Giannetti	1) On pages xiii, 32, 49, 54, 68 of the plan the terms "Roadway Design Manual" is used. However, the proper name is "Road Design Manual".	Change: Revise to "Road Design Manual" in all occurrences as requested.
		2) The reference links do not work	The hyperlinks have been updated and tested as requested.
		I am happy to review the final draft to verify all links work after the above mentioned issues have been addressed. Please let me know if I can be of further assistance.	
02	4/12/2019	Hi Sheila, will the (draft) appendices be available for review? I was	Thank you for your comment.
	Chris Ward	just curious to see what the public comments were.	Appendices A-D are available on the Documents page of the plan website. They aren't labeled "Appendix" but those are the documents this section is referencing.
			Appendix A, Public Involvement Plan is listed under the Public Outreach Section and Appendices B-D are the technical memorandums.



ID	Date/Name	Comment	Response
			Appendix E: Public Comments – this will be developed after the May 5th deadline, package the comments we receive on the draft Plan.
03	4/12/2019 Susan Jack	"I cannot believe that until today, when an e-mail arrived, I had never heard a word about this undertaking by the Montana Department of Transportation.	Thank you for your comment.
		I have lived in rural Montana for almost 30 years and the biggest menace on the rural roads today are bicycles. They take over roads, they won't let you pass, they flip you off for driving a vehicle and they have, more than once, delayed a town trip for me by over an hour.	
		I started reading the document, made it probably half way through, and closed the document.	
		Pedestrians are not an issue on roads, they move to the side. The only time I have had a problem with a runner is when they put in their ear buds, cannot hear you coming and veer into the lane of the vehicular traffic. For the most part walkers and joggers are no problem.	
		But bicycles, in rural areas, are a danger to any and everyone on the road. Rural Montana residents sometimes have to drive literally hours to get supplies and most everyone is on a schedule so when a road is closed for bicyclists to use our roads, or when there are 3 or 4 abreast in a line of traffic it totally hinders any schedule. I don't believe that people on bicycles pay any road use tax, they are not licensed, yet they are allowed to hinder the life and work of people in rural areas.	
		I cannot imagine the money that has been spent on this study. In cities you have a whole different set of issues with bicyclists for sure. My experience in cities with bike lanes is that they are dangerous and they make turning dangerous.	
		I think the Department of Transportation could have used their money in a more productive way that to take the time to create the document I began reading. I honestly cannot believe I am living in a day and age where this document was even considered as a way to use funds. I am disappointed, I expect more from the State of Montana."	
04	4/20/2019 John Juras	Thanks for sending this. I am enjoying reviewing the plan and will have comments.	Thank you for your comment. Please email MDTBikePed@mt.gov for educational/safety item requests.
		Who should I contact to request educational and safety items that I can share at two events I am staffing this spring? The bike/ped coordinator is vacant, correct?	
05	04/22/2019 Joseph Lloyd	I'm pleased to see the state has developed this plan. I ride my bike to work as much as I can. I live in Great Falls and generally I find drivers to be respectful and courteous. However, it would be great if we cyclists and pedestrians had our own routes to get around. Every time I go to Missoula, I find myself envious of their network of sidewalks and biking paths. I'd like to see the state work to create more of these alternative transportation options so that riding and walking don't feel so frantic. Keep up the good work!	Thank you for your comment.
06	4/23/2019 Charles Kuether	Thank you for this effort. I ride my bicycle where I think I can safely and I would like to feel safer on the roads than I do now. Most drivers are considerate, but mistakes can be lethal. So, to the extent education and road design can be used to protect ALL users I am in flavor of developing these options.	Thank you for your comment.



ID	Date/Name	Comment	Response
07	04/26/2019 Ben Weiss	It was nice to chat a bit at the training this week (between naps). As I mentioned, the City of Missoula is having a hard time coordinating comments within the timeline allotted. I understand Lynn (and maybe you?) will be attending the Bike Walk Montana rendezvous on 5/10 and taking comments there. I'm wondering if you may be willing/able to extend the official deadline for comments until 5pm on Friday 5/10 so that our municipality (and maybe others) can provide consistent and thorough feedback. Thanks for the consideration and have a good weekend.	The deadline for receiving comments is May 05.
08	4/29/2019 Nancy Andersen (AARP)	, , ,	The vision statement expresses what the Plan is expected to achieve or accomplish. The statement was developed based on review of other plans and input received from the public and stakeholders. The statement was vetted and approved through the Steering Committee. Change: Remove "Vision:" from the vision statement on page xi. The state has adopted the goal of Vision Zero (zero deaths and serious injuries). The Montana Comprehensive Highway Safety Plan identifies goals and targets for improving safety on Montana's roadways. Change: Revise the terminology from "disadvantaged" to "vulnerable" as requested. Crash statistics and more detailed evaluation is contained in the Montana Comprehensive Highway Safety Plan.
		P. 17, second paragraph that begins with "Figures 2 and 3 show" this paragraph is very misleading. If you look closely at the charts provided to the right, the only thing that can be stated strongly is that there significantly fewer serious bicycle injuries in 2008 than in 2017. But in fact, 2008 may be an outlier. In subsequent years there is NOT a clear trend line for either pedestrian or bicycle injuries or deaths. Also, seeing the	



ID Date/Name	Comment	Response
	charts, it is not an accurate statement to say that "the total number of combined non-motorist fatalities and serious injuries decreased from 98 in 2008 to 65 in 2017 (this part of that statement is accurate), an average decrease of approximately 4.5% per year over the ten-year period (not accurate given the data points in the table), and an overall decrease of 34%" (true, but misleading). In years 2009, 2011, 2013,and 2016 non-motorized fatalities were higher than the average number over this period. Thus, we would NOT conclude that fatalities are trending in any particular direction. • We were surprised that there were references to drunk pedestrians and cyclists but not to excessive motor vehicle speed. This is particularly relevant to urban roadways, and others that have, or would like to encourage pedestrian and bicycle travel. We know speed to be a top contributor to ped/bike injuries and fatalities. And that is not just speeding, but also roadways that are designed and posted for unsafe vehicular travel speeds. • Excellent that MDT has adopted the PROWAG as an applicable accessibility standard and it reads as if the state has a decent system for ensuring road alterations are incorporating applicable standards. While we cannot really evaluate this based on this document, it is one of the few that actually includes reference to an ADA Transition Plan, inventory, and compliance tracking system. • Love the photo on p. 23. Montanans are definitely hardier than folks in DC! But the lack of safe accommodations for this winter cyclist is frightening.	Data is not available for vehicle speed at the time of crashes. It is known that higher vehicle speeds typically result in higher severity crashes. There are many discussions throughout the document about the benefits of separating high-speed vehicles and bicyclists/pedestrians.
	 P. 25, reference to American Association of Retired Persons should be changed to AARP. We officially changed our name many years ago and should be referred to by the acronym alone – simply AARP. P. 25, Funding section. While this section mentions on page 26 that "not all pedestrian and bicycle facilities are developed as stand-alone projects; many area provided as part of associated roadway construction projects," the general tenor of this section is that there is not enough funding sources for ped/bike accommodations. One of the key messages that should be emphasized with regards to a complete streets approach is that we need to spend the money we have differently to improve safety on our roadways. Every road project (except interstate highways, and even those where they cross other roads, trails, sidewalks, etc) should be evaluated through the lens of complete streets, looking for the opportunity to improve safety and convenience for all road users. We would expect this message to be much stronger in the state's pedestrian and bicycle plan, which intends to set a vision. The current plan seems to set it up that ped/bike projects are going to get the leftovers and a tiny bit of money from underfunded dedicated funding sources. Good reference to up-to-date guidelines and reference docs (e.g., AASHTO Guide for the Development of Bicycle Facilities, 2012). The authors may wish to note though that a new and improved version of this guide is expected to be published this 	Change: Replace reference to American Association of Retired Persons with AARP as requested. This section illustrates how there is not enough available funding to complete all the pedestrian/bicycle projects desired. Pedestrian/bicycle accommodations are considered in all new construction and reconstruction projects, however, cost, impacts, and needs can be inhibiting factors. The caption under the image on this page reads "The AASHTO Guide for the Development of Bicycle Facilities provides information on how to develop facilities that meet the needs of bicyclists and highway users. It is currently being updated."
	year. We've learned a lot since 2012. Please let me know if you have questions or need any additional information from AARP. Thanks again for your work on this project and for welcoming our thoughts and comments.	
09 5/2/2019 Lauren Sidoruk	Please "pave the way" (No pun intended!) for road biking on more main roads. For instance, there is the Bitterroot Trail, of course, bordering Hwy 93, but I live off Eastside Highway in Corvallis. If there were a bike trail along Eastside highway, I would be much	Thank you for your comment. Strategy 1C addresses improved safety on major roadways. Strategy 5C may also be applicable to studying the feasibility of dedicated facilities for non-motorized travel between destinations.



ID	Date/Name	Comment	Response
		more likely to bike to Hamilton, which is a commute I take several times a day. The speed limit on Eastside Hwy is appropriately set at 60, but is dangerous for walkers and bikers. We can continue to set Montana as a leader in safe biking designated paths to kemp's Montanans safe, keep our air clean, and increase tourism revenue in our state.	
10	at 60, but is dangerous for walkers and bikers. We can continue to set Montana as a leader in safe biking designated paths to kemp's Montanans safe, keep our air clean, and increase tourism revenue in our state. 5/2/2019 Thank you for opening up a public planning process on how best to accommodate bikes and pedestrians on rural routes. Here in Red Lodge, pretty much any bicycle use involves riding on rural highways. Before I retired, I commuted to work along Highway 78, before the bike path was installed, so I am pretty happy about having that path in place now.	Thank you for your comment. This plan is a policy-based plan which is not intended to identify specific projects. We hope that the strategies that have been provided will address some of these issues. They are intended to offer guidance to localities to resolve existing safety concerns and avoid some of these mentioned issues in future projects.	
		for pleasure, so I'm sure you've had these same discussions internally. Also because I'm an engineer, I'm looking for solutions. I think about how Yellowstone Park opens Park roads to bikes in April, after plowing. The sign that's up on the Beartooth now remains at the gate at all times, even when equipment is not working. Couldn't you specify that it's OK for bikes to use the highway after 4:30 and before 8:00 a.m. and on weekends? I would love to see you consider moving the sign up the highway as the road gets plowed to where there's no conflict between equipment and bikes. Perhaps you install one of those mobile traffic lights - but just moving the sign is cheaper. See my comments below about liability. Cyclists also pay gas tax. But there may be ways to collect other funds to facilitate bike friendly mitigation. We'd all support it! Another method the local ski area uses to accommodate uphill ski traffic in the early morning, while grooming equipment is out, is to have "uphillers" (skiers with skins) go online and sign a liability waiver, and then they are required to wear a reflective arm band that alerts groomers that they've signed the waivers. Perhaps	



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		there's a system in there that could be adapted to the Beartooth Highway situation.	
		I make this request with the strongest of pleas. It is truly a unique experience, being able to ride up there in the quiet season, and it's been such a loss. I hope you'll consider putting mitigations in place that will reopen that option.	
		Thanks again for opening up a comment period! And thank you for all you do to make our infrastructure safe in an era of reduced budgets. I hope that Congress figures out a way to restructure the funding and get maintenance funding back on track.	
11	5/2/2019 Don Carroll	I live in Red Lodge. My wife and I are retired and enjoy riding our bikes to Bear Creek (Hwy 308); We ride Beartooth Pass (Hwy 212); We ride to the Stillwater mine (Hwy 78 and 420). Riding bikes is important to us and many others in the community. Bicycle recreation is part of our economy. I want to see safe roads for cars and bikes. I like rumble strips but if you don't make room for bikes on the shoulderwe'll ride in the traffic lane. I know its hard, but please support bike use? Be creative. It matters to this community.	Thank you for your comment. The MDT Rumble Strip Guidelines include a discussion about accommodating bicycle users on page 3. It is MDT's intent to facilitate bicycle travel as feasible. Montana is one of 5 states in which it is lawful for bicyclists to ride on all public roadways.
12	5/2/2019 Doug Habermann (Bike Walk	Bike Walk Montana is glad to provide the following comments on the April 5, 2019 Draft Montana Pedestrian and Bicycle Plan. We would like to thank MDT and the plan steering committee for	Thank you for your comment.
	Montana)	their good work. We recognize, as the first such plan completed for Montana, that this is a positive step forward. We would like to urge the Department to really look 20 years down the road and be innovative, bold and progressive in the final plan version. This plan should create a vision and specific guidance that individuals, organizations, local governments and the entire management structure of MDT will understand, embrace and have clear direction to implement.	
		The plan accurately and adequately describes the current conditions and what most of the issues are.	
		The plan should be more direct and descriptive of how it will be implemented. Please add an implementation schedule with a timeline for specific benchmarks and actions. Provide clear direction on how MDT district offices will integrate this into their site specific planning, construction and maintenance operations. Show how Montana's ped/bike system will grow in the implementation section. State highways are the backbone of our ped/bike transportation system and MDT, as the primary transportation entity in Montana, should have a strong and recognizable program both for MDT action and in support of other agency, local government and citizen action. Continue the steering committee permanently to assist MDT in plan implementation. There should be an annual meeting, open to the public, as an effective way to stay engaged with MDT's customers and track plan progress.	The language in the Plan was vetted through the Steering Committee to arrive at content that all entities could agree to. Each entity will be responsible for implementing applicable strategies and setting specific benchmarks, if desired. The Plan is intended to be a resource to be used by MDT and its partnering agencies as they work to fulfill the needs of pedestrians and bicyclists.
		The plan should directly and measurably lead to more public engagement and participation. It should foster and direct more multilevel transportation community coordination, cooperation and quantifiable outcomes. To support this, we feel the bike/ped coordinator position should be filled immediately and as the sole duties of that person. Each District office should have a designated bike/ped staff person to advise and assist the District manager in plan implementation with specific expertise in complete streets, active transportation, project management including ADA	The Bike/Ped Coordinator duties are currently being fulfilled by MDT.



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		compliance and, most importantly, the ability to serve as a public point of contact for non-motorized transportation. We feel more data is needed on statewide bicycle counts and would recommend strengthening/creating a statewide non-motorized count program. We recommend that the plan direct and create policy to connect to existing or planned trails when constructing new or re-constructing adjacent roadway. Acknowledge last legislative session's HJ45 and how MDT will participate in that study, what outcomes from the study would support or strengthen the plans vision and goals and non-motorized travel in Montana, and how MDT will address the aspects called for in HJ45 outside of the study since passage indicates legislative interest. The plan should do the same with SJR28 and specifically of what traffic safety systems and policy to "utilize a more dynamic system to create safer roadways", as stated in SJR28. We have specific page comments and recommendations' that	"Encourage statewide, MPO, or community level travel surveys and standardized nonmotorized data collection programs to gauge local transportation habits and establish trends over time." is listed as an action item under strategy 2A. Bike/ped accommodations are considered by MDT in all new construction/reconstruction projects, however, feasibility/community buy-in/funding are often limiting factors.
		follow. Page X. First paragraph. Delete word recreation. Although this is true, the plans scope is transportation, not recreation. Page 3. 1.2.1 Add the word improve to Goal 3. "Preserve and maintain and improve". Add independent and connecting to Goal 5. "as important independent and connecting transportation	This Plan is intended for use by both MDT and its partners and as such, acknowledges how transportation and recreation overlap. The language of the Goals was thoroughly vetted by the Steering Committee.
		modes". Page 7. 2.2.1 Bike Walk Summit It would be appropriate to credit Bike Walk Montana as the primary sponsor of the Summit. Page 9 Second bullet. "Evaluation is on a case-by-case basis to understand context." How is this addressed in the implementation of the plan. What specific processes are laid out to direct district offices to do so?	Change: The Summit, hosted by Bike Walk Montana, represented a captive audience of key stakeholders from across the state. This is in reference to the many processes MDT has in place including project review by the Rumble Strip Committee, a safety analysis, traffic analysis, public involvement, etc.
		Page 12. 3.2 2 nd paragraph. "Trips may be are for transportation" Users may also have comfort or scenic values for transportation purposes as well, as well as safety.	The Plan acknowledges that walking and biking serve both transportation and recreation purposes.
		End of 4 th paragraph add "and rendering it of little value as a bike/ped transportation alternative."	
		3.4 Good section, accurately captures that bike/ped transportation positively connects communities. Add more emphasis regarding the long term economics of tourism, improved health, reduced wear and tear on infrastructure and land values.	
		Page 17. Charts would be more understandable with description underneath rather than above.	Change as requested.
		Page 18. Sect 3.6 End of 1rst paragraph add "or no sidewalks or pedestrian accommodation at all."	Change: Examples of accessibility barriers include steep curb ramp slopes, vertical sidewalk discontinuities (i.e. uneven
		$2^{\rm nd}$ paragraph – give full name for PROWAG at first mention, rather than acronym.	sidewalks), and lack of pedestrian facilities in general. PROWAG was defined on page 2.
		3 rd paragraph- add at end "or funding."	
		4^{th} paragraph – add inclusive walk audits as a preferred method to do site assessments in both the planning and construction phases.	The language in this section was thoroughly vetted through MDT External ADA Specialist.
		Sect 3.7 Well written section, makes many important points. Make lines on graphs red to match text color and provide more contrast.	Change as requested.



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		Section 3.8 First sentence, use "strong and growing" rather than "booming" as more accurate since it is a strong trend, rather than something that is implied will "bust".	Change as requested. Private funding is addressed in paragraph 2 on page 25.
		Sect 3.9 Add to first sentence that private dollars are also spent such as through the AARP Livable Communities program.	Change: "Funding for pedestrian and bicycle education, enforcement, encouragement, and infrastructure exists at the federal, state, local, and private levels."
		3 rd paragraph – Add that RTP program funds are allocated through the State Parks Citizen Trails Advisory Committee. Address how the recently passed SB24 trails bill is expected to affect walking and bicycling in Montana.	Change: "Montana State Parks collaborates with the State Trails Advisory Committee to review the RTP applicants each year. Decision makers"
		4 th paragraph – Note that BACI is no longer being funded as a program.	The BACI workshops are no longer funded however, DPHHS still provides resources/materials on the BACI.
		Section 3.10 – 1rst paragraph – Add the word individuals to list of "these groups" to add emphasis to citizen advocacy. Add "and a defined commitment to continue to working together in the future."	Change: These groups may include federal, state, county, city, and tribal government agencies, as well as stakeholders, special interest groups, and individuals.
		Section 4.1 2 nd paragraph – define what "centerline miles" refers to or use a more commonly understood description. Please provide more specific detail on the maintenance needs and maintenance and preservation costs including quantified personnel, materials, and planning costs.	Centerline miles are used to measure the length of roads and highways. Lane miles are used to measure the total length and lane count of a given highway or road.
		Section 4.2 Describes the funding situation accurately. The plan should show TA spending detail by year including specific projects and locations.	The public may review TA projects and locations on MDT's website.
		6th paragraph – Description of optional fee. Provide information on how opportunity for citizens to contribute was, or was not, publicized. How have County Treasurers and Motor Vehicle license clerks been informed and involved? This funding opportunity has to be actively promoted and managed to actually get dollars on the ground more quickly.	
		7 th paragraph – Describe how fuel tax funding is tied to more driving, creating no incentive to shift more transportation to walking or bicycling. This section should also discuss how reducing number of lanes – going on a road diet – can potentially reduce road wear and tear and reduce future maintenance costs. 13,000 bicycles cause the wear of one automobile. This can also reduce construction costs with less expensive bike/walk surface construction methods and materials.	It is discussed on page 26 how tax funding is tied to more driving, fuel efficiency, etc. Other options are being explored by the federal government such as VMTs but no solidified alternatives have been identified.
		Section 4.3 1rst paragraph "user safety is often a concern compromised."	Change: "When non-motorized infrastructure is an afterthought, user safety may be compromised."
		Section 5.3 Good to recognize MDT efforts with the website and publications. State the history of the bike/ped coordinator position including vacancies, time as shared a duty, and amount of turnover in that position. As we said above, the bike/ped position should be filled as the sole duty for that person, imediately. Plan implementation, not to mention current duties of reviewing each project, will be more effective with a sole-focus dedicated and specifically trained position. Include a breakdown on that positions duties, expectations, outcomes and specific actions in the last five years.	This level of detail is too specific for this section. The duties of the bike/ped coordinator are currently being fulfilled by MDT.
		Section 5.4 5 th paragraph Add the use of and describe demonstration pop up projects as another community level activity. Section 6. Overall, this section is well structured and fairly complete in describing extent gives that sould improve the Montanes bile (well).	Change: Examples of community level campaigns include neighborhood speed watches, slow down yard sign campaigns, neighborhood fight back programs, pace-car campaigns, radar speed trailers, pop up projects, and crossing guards.
		in describing strategies that could improve the Montanan bike/walk transportation condition. It needs more specific actions and exactly	crossing guarus.



ID	Date/Name	Comment	Response
		how MDT districts will integrate the plan into construction, maintenance and management programs. This is the most important part of the plan and the area that the public is most interested in, and will continue to be once the plan is complete. Much more specific, action words should be used. Planning is the phase where an agency "considers, studies, and explores". It then leads to specific and clear action. Plan direction should define responsibilities and specific actions for MDT. This section needs to be direct and action orientated as citizens, organizations and local governments will be looking to it for direction.	This plan is intended to be used by MDT and its partners to improve walking and biking in Montana, as such, calling out specific entities for specific action items narrows the scope of each action item. The purpose of the roles and responsibilities sections under each strategy is to identify ideas that applicable agencies/partners may implement to support each strategy.
		We list below our page specific recommendations but this entire section should be reworked with this specific action provoking approach.	
		Under "Resources" sections, full titles (particularly where there is room) and website links should be listed . This will allow citizens and agencies to go directly to these resources.	Plan refrains from providing website links because they can become obsolete when entities update their websites.
		MDT should include specific locations and actions that will be taken when/if suggested through plan public comments for the applicable section. Language changes are listed by bullet point(bp) number.	Thank you for your comments on specific language in the Plan. This is a policy-based plan and is not intended to identify specific projects. The Plan was developed in coordination with multiple entities and seeks to serve many needs. The language was thoroughly vetted through the
		Strategy 1A. bp1 Use instead of Consider use Bp2 Use instead of Consider Bp3 Perform instead of consider Bp5 Provide instead of Consider Bp7 Utilize instead of Consider Bp10 Implement instead of Consider feasibility of	Steering Committee to arrive at content that all entities could agree to.
		Strategy 1B Bp1 Construct instead of consider Bp 2 Provide instead of Consider the feasibility of Bp 5 Require instead of Consider requiring Add bp: Review and update design guidance for pedestrian and bicycle facilities every 3-5 years.	
		Strategy 1C Bp1 and instead of to Bp3 Require instead of Consider requiring	
		Strategy 1D Bp1 Reduce instead of Solicit support for methods for reducing Bp2 Pass instead of Solicit support for a and add or defined distance after safe Bp3 Keep updated and apply instead of Study Bp4 Improve understanding of and involve the public and affected community in using instead of Study and address	
		Strategy 1E Bp2 Integrate instead of Consider Bp4 Integrate rather than Consider	
		Strategy 1F Bp1 Create consistency instead of Consider coordinating Bp5 Improve instead of Consider Add bp: Create and implement a system to measure and document location and rates on ped/bike injuries across jurisdictions.	
		Strategy 2A Change Explore to Implement in strategy title. Bp3 Use and activate instead of Explore use and/or activation. Add bp: Engage citizens in gathering both quantified as well as antidotal information through observation, on line polling and surveying	The number of publications continues to grow, checking the
		Strategy 2B Insert a list of publications available under Resources. Bp1 Provide instead of Consider prioritizing. Bp 10 Outside scope of this plan.	main websites will result in the most up-to-date list of publications.



ID	Date/Name	Comment	Response
		Bp11 What are these programs and how would they benefit ped/bike transportation?	
		Strategy 2C Is there a current standard for MDT transportation engineers? Create a benchmark to track training. Bp3 Provide and require instead of Encourage, remove "to seek" and clarify that this might only be available out of state. Bp4 Yes, definitely. Add provide to city and county transportation Departments and cooperate with non-profits to share resources and copresent at conferences and meetings.	
		Strategy 3A Add "and improvement" to the title. We want to make facilities and the system better. Bp3 Sweep instead of Consider sweeping and add that private partners be allowed to cooperate and provide funding for MDT maintenance to do so	
		Strategy 3B Bp1 to create instead of and explore mechanisms for creating Bp3 Rewrite to read - Engage and organize with individuals and organizations through programs such as Adopt a Path, Pop up projects, and inclusive walk audits. Bp4 Dedicate instead of Pursue Bp5 Create instead of Consider	
		Strategy 3B. Add "and construction of" after maintenance in the strategy title. Add bullet points that would support this highly needed and publicly desired activity.	
		Strategy 4A One of the most important considerations of this plan, since the disabled population, including our growing senior population, will have an increasing need for effective bike/ped transportation Bp1 Fully implement instead of Continue implementation Bp2 Require instead of Integrate Bp3 Always instead of Promote and with innovative design approaches that consider both mobility and sight disabilities. instead of where appropriate. Bp4 Require instead of Provide and/or expand Add bp: Perform inclusive walk audits for all projects during both design and construction phases.	
		Strategy 4B Add bp: Collaborate/coordinate with communities for informed and improved decision making regarding school and public facility location using geolocation, neighborhood density, socioeconomic diversity and existing and future infrastructure. Bp3 Develop and implement instead of Consider creating Bp4 Dedicate instead of Consider developing Bp5 Inform of and assist instead of Work with and to apply for instead of on	
		Strategy 5A The purpose section needs to be expanded to fully and accurately describe quantified economic benefits in addition to the health benefits, which are well described. Add work under the "Access to" list. Bp2 Delete parks as this is outside of this plans scope Bp6 Provide instead of Adopt Bp7 Adopt instead of Consider adopting Add Bp: Connect residential and commercial centers as a strategy to improve economic growth for diverse communities and as a planned transportation community.	Change: Add the following language to the purpose of Strategy 5A: There are many benefits from walking and bicycling at the individual, household, and community levels. Benefits include increased physical activity, reduced healthcare costs, lower transportation costs for households, and improved air quality. As more people walk and bike, the benefits increase as well. Targeting non-motorized improvements to areas with a high potential for walking and bicycling trips, or those areas
		Strategy 5B Bp1 Add redirection as a funding opportunities This must be considered under the scenario of no new funding sources can be found. Bp2 do not instead of avoid Add Bp:	likely to have shorter trip lengths, can help to leverage these benefits.



ID	Date/Name	Comment	Response
		 Ensure Bike/Ped coordinator position is filled as a priority with a knowledgeable, empowered and active proponent of bicycling and walking transportation. Support the Bike/Ped coordinator position through an engaged administrative structure and complete operations budget. Establish bike/ped staff positions in both the construction and maintenance divisions as well as at each District office. Strategy 5C Bp1 Construct instead of Study feasibility Bp2 Construct instead of Pursue Bp3 Utilize instead of Explore Strategy 5D Bp2 add and create after determine Bp3 Integrate instead of Coordinate Bp4 Improve instead of Study and inventory Strategy 5E Bp1 Revise instead of Review Bp3 Integrate instead of Consider Bp5 Improve instead of Work to improve Bp6 Consult instead of Ensure and remove are consulted 	Thank you for your recommendations. The Bike/Ped Coordinator duties are currently being fulfilled by MDT.
		Bike Walk Montana again commends the plan as a needed and positive step forward. The plan needs to convey more that this is an ongoing, recognized and significant activity for MDT. We thank MDT for allowing comment at our May 10 affiliate and advocate rendezvous and look forward to a good discussion there. We value our relationship with MDT and hope that we will continue to be viewed as a partner and essential contact representing pedestrians and bicyclists in Montana.	
13	5/2/2019 Jack Stamm	I have reviewed comments on the plan made by Montana Bike Walk and agree with and endorse them. Thanks for your work on the plan. I look forward to implementation of it.	Thank you for your comment.
14	5/3/2019 Shyla Patera	My name is Shyla Patera. I am an IL Specialist with North Central Independent Living Services Inc. I also serve as Chair of the Great Falls Transportation Advisory Committee. Thank you for allowing me to submit comments on the draft Montana Bike Pedestrian plan. I have been honored to also sit on the Steering Committee. I believe the draft plan is comprehensive and will be guiding many of Montana's communities now and in the future regarding Biking, Pedestrian, Access and Mobility Strategies. NCILS is excited by the Bike/Ped Plan release and hopes that many of the goals and strategies cab be studied in the legislative interim through HJ 45. On the public infrastructure projects that are funded, NCILS hopes that communities will prioritize accessible curb cuts, contiguous sidewalks, alleyways as well community accessible streets policies will be studied, implemented and financed. NCILS would encourage MDT to highlight accessible community planning in community MPO planning processes. Montana must consider strategies that assist Montana communities in adopting ADA transition plans. MDT should pursue planning funding in order to accomplish this. I know that there was some discussion on which standard for accessibility in Montana communities should be enforced. NCILS would also hope that pedestrian and accessibility needs could be considered in the Statewide Transit Management Plan. NCILS hopes that traffic	Thank you for your comment.
		signals and timing studies are undertaken as future community roadways are repaired. Roadways need wider shoulders on our	



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		interstates, urban roads and community connecter roads where possible.	
		North Central recommends that partnerships be strengthened with the Office of Public Instruction so that Montana students who need to walk, bike or wheelchair ride to school may do so safely through a Safe Routes to Schools or similarly funded programs.	Change: Add Office of Public Instruction as a resource under Strategy 4B.
		As a state, NCILS hopes that Montana highlights recreational accessibility options for Montana trails and areas, so they can be fully accessible to all. NCILS would hope to see rural and urban trends on biking, walking as well as disability access in Montana. I hope that there would be some discussion of winter strategies i.e. snow removal in the report as well as accessible way finding and signage in future reports. Even though public transportation and driving are not under the purview of this Plan. NCILS hopes that biking and walking and advocates can support programs which will assist public transportation and accessible parking including enforcement of accessible aisle ways.	Strategy 3A discusses preservation and maintenance of pedestrian and bicycle facilities, including snow removal. Wayfinding is included as part of Strategy 5A.
		I hope that all transportation systems and communities work to implement disaster and emergency preparedness principles as well. Thank you for allowing North Central to comment.	
15	5/3/2019 Russ Lawrence	Thanks for the opportunity to comment on the plan. I am a vehicle owner/user, a cyclist for transportation purposes, and pedestrian for transportation also. I am 63 years old, and have been using all modes of transportation for decades in Montana, and have seen many positive changes. I am eager to see even more, and this plan provides an excellent vehicle (no pun intended) to accomplish those changes. Some suggestions of a general nature: Page xi, Vision: change "desire" to "have access to." This is a vision statement, not an aspirational statement, and should describe a desired outcome. In the end, once this plan is implemented, our goal is not to leave Montanans "desiring" a safe, accessible and sustainable system, we want to have one.	The vision statement expresses what the Plan is expected to
		Goal 1: use "eliminate," not "reduce." If the metric is "vision zero," let's shoot for zero. Goal 3: Preserve, maintain, <u>expand and improve</u> the pedestrian/bicycle transportation system. I don't want simply to keep	
		the status quo, I want improvement and expansion, that's what this plan should be about. Goal 5: Bicycling and walking should be addressed not as "important" transportation modes, but as "co-equal" modes along with motorized vehicles, as they are by law. The goal should reflect this. And, if you are specifying "health," I would also ask that you recognize "recreation." Better still, instead of itemizing, simply state	
		"for all users, for all purposes." Page xiii: under Implementation and Next Steps: add a bullet point for "Use data to expand bicycle/pedestrian infrastructure." There is nothing in the existing bullet points that actually calls for building anything.	
		Under education, I would like to see an emphasis on distracted drivers (texting, cell phone use, managing sound system, etc.) and on cyclist/pedestrian rights – we are users, not impediments, and have equal and sometimes superior rights to motor vehicles. Everyone should be clear on that.	
		I would also like to see uniform, cycle-friendly road construction and patching standards that provide the safest road surface for cycling; and the elimination of rumble strips on narrow shoulders.	



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	ate/Name	I also would like to incorporate the language suggestions proposed by Bike/Walk Montana. This is a plan, not an aspiration statement, and it should be stated in terms of desired outcomes: Strategy 1A bp1 Use instead of Consider use Bp2 Use instead of Consider Bp3 Perform instead of consider Bp5 Provide instead of Consider Bp6 Pp7 Utilize instead of Consider Bp7 Utilize instead of Consider Bp7 Utilize instead of Consider Bp8 P Provide instead of Consider feasibility of Strategy 1B Bp1 Construct instead of consider requiring Add bp: Review and update design guidance for pedestrian and bicycle facilities every 3-5 years. Strategy 1C Bp1 and instead of Consider requiring Add bp: Review and update design guidance for pedestrian and bicycle facilities every 3-5 years. Strategy 1C Bp1 Reduce instead of Consider requiring Strategy 1D Bp1 Reduce instead of Solicit support for methods for reducing Bp2 Pass instead of Solicit support for and add or defined distance after safe Bp3 Keep updated and apply instead of Study Bp4 Improve understanding of and involve the public and affected community in using instead of Study and address Strategy 1E Bp2 Integrate instead of Consider Bp4 Integrate rather than Consider Bp4 Integrate rather than Consider Strategy 1F Bp1 Create consistency instead of Consider coordinating Bp5 Improve instead of Consider Add bp: Create and implement a system to measure and document location and rates on ped/bike injuries across jurisdictions. Strategy 2A Change Explore to Implement in strategy title. Bp3 Use and activate instead of Explore use and/or activation. Add bp: Engage citizens in gathering both quantified as well as antidotal information through observation, on line polling and surveying Strategy 2B Insert a list of publications available under Resources. Bp1 Provide instead of Consider prioritizing. Bp 10 Outside scope of this plan. Bp11 What are these programs and how would they benefit ped/bike transportation?	Thank you for your comments on specific language in the Plan. The strategies and action items were reviewed and approved by the Steering Committee to arrive at wording that all parties could agree upon. This Plan is intended to be used by MDT and its partners to improve walking and biking in Montana, as such, calling out specific entities for specific action items narrows the scope of each action item. The purpose of the roles and responsibilities sections under each strategy is to identify ideas that applicable agencies/partners may implement to support each strategy. Additionally, this is a policy-based plan and is not intended to identify specific projects.
		to share resources and copresent at conferences and meetings. Strategy 3A Add "and improvement" to the title. We want to make	



o Bp3 Sweep instead of Consider sweeping and add that private patrents be allowed to cooperate and provide funding for MDT maintenance to do so o Stratery 35 Bp1 to create instead of and explore mechanisms for creating of the patrent of the patre	ID Date/Name	Comment	Response
Strategy 5C	ID Date/Name	 Bp3 Sweep instead of Consider sweeping and add that private partners be allowed to cooperate and provide funding for MDT maintenance to do so Strategy 3B Bp1 to create instead of and explore mechanisms for creating Bp3 Rewrite to read – Engage and organize with individuals and organizations through programs such as Adopt a Path, Pop up projects, and inclusive walk audits. Bp4 Dedicate instead of Pursue Bp5 Create instead of Consider Strategy 3B Add "and construction of" after maintenance in the strategy title. Add bullet points that would support this highly needed and publicly desired activity. Strategy 4A One of the most important considerations of this plan, since the disabled population, including our growing senior population, will have an increasing need for effective bike/ped transportation Bp1 Fully implement instead of Continue implementation Bp2 Require instead of Integrate Bp3 Always instead of Promote and with innovative design approaches that consider both mobility and sight disabilities. instead of where appropriate. Bp4 Require instead of Provide and/or expand Add bp: Perform inclusive walk audits for all projects during both design and construction phases. Strategy 4B Add bp: Collaborate/coordinate with communities for informed and improved decision making regarding school and public facility location using geolocation, neighborhood density, socioeconomic diversity and existing and future infrastructure. Bp3 Develop and implement instead of Consider creating Bp4 Dedicate instead of Consider developing Bp5 Inform of and assist instead of Work with and to apply for instead of on Strategy 5A The purpose section needs to be expanded to fully and accurately describe quantified economic benefits in addition to the health benefits, which are well described. Add Bp: Connect residential and commercial centers	Change: Add the following language to the purpose of Strategy 5A: There are many benefits from walking and bicycling at the individual, household, and community levels. Benefits include increased physical activity, reduced healthcare costs, lower transportation costs for households, and improved air quality. As more people walk and bike, the benefits increase as well. Targeting non-motorized improvements to areas with a high potential for walking and bicycling trips, or those areas likely to have shorter trip lengths, can help to leverage these benefits. Thank you for your recommendations. The Bike/Ped



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		 Bp1 Construct instead of Study feasibility Bp2 Construct instead of Pursue Bp3 Utilize instead of Explore Strategy 5D Bp2 add and create after determine Bp3 Integrate instead of Coordinate Bp4 Improve instead of Study and inventory Strategy 5E Bp1 Revise instead of Review Bp3 Integrate instead of Consider Bp5 Improve instead of Work to improve Bp6 Consult instead of Ensure and remove are consulted Once again, thank you for the opportunity to comment on the plan, and I look forward to many more years of safe cycling and walking on Montana's transportation system. 	
16	5/3/2019 Mel Moser	Thank you for working to develop Montana's first Pedestrian and Bicycle Plan! This is a big step forward. And if done in a way that significantly improves the conditions for pedestrians and cyclists, it could provide a big boost to the health and economy of Montana, through increased livability, lowering obesity rates, attracting tourists, decreased collisions and injuries, etc. There are many good strategies in the plan. I encourage you to include timelines for specific benchmarks for those strategies. These are crucial in giving the plan the power to accomplish the goals it sets forth. As a driver, cyclist, pedestrian, and mother, I appreciate the work you are doing here to improve walking and biking conditions in our state!	Thank you for your comment. This is not intended to be a time-dependent document. The Plan is intended to be a resource to be used by both MDT and others as they work to fulfill the needs of pedestrians and bicyclists. All entities will be responsible for implementing applicable strategies and setting specific benchmarks/timelines.
17	5/3/2019 Laura Crawford (Adventure Cycling Association)	I am submitting these comments for the Montana Pedestrian & Bicycle Plan on behalf of Adventure Cycling Association. We understand that Montana Department of Transportation (MDT) has chosen to not identify specific projects within this plan; however, we encourage the identification of known bicycle routes and bicycle corridors, for the purpose of informed planning of future projects. By identifying locations where people are currently riding bicycles and key destinations to which people want to safely ride, MDT will be better positioned to prioritize bike projects in the future. The draft plan identifies Adventure Cycling as a resource for both cyclists and communities. Indeed, we hear regularly from communities across Montana who want to better attract cyclists to their part of the state for the purposes of economic development through bike tourism. These communities recognize the importance of being on a known bicycle route or a shared-use pathway that connects into a key destination. Thus, identifying these routes and corridors will help prioritize projects to meet the goals and strategies listed in the plan. Indeed, strategy 1C calls for improving safety for cyclists through widened roadway shoulders. Identifying bike routes and corridors would go a long way to identifying which shoulder widening projects would lead to the greatest improvements for cyclists on Montana roadways. We also encourage the plan to specifically identify the U.S. Bicycle Route System (USBRS) within the section on bicycle travel. Designation of U.S. Bicycle Routes is not a construction project, and identifying U.S. Bicycle Route corridors within Montana will assist MDT and local jurisdictions in prioritizing future projects. (You may download the National Corridor Plan, approved by AASHTO, from our website: https://www.adventurecycling.org/corridorplan.)	Thank you for your comment. Strategy 5D speaks to bicycle route identification.



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		Additionally, because the draft plan suggests that agencies "use AASHTO guidance to define criteria that qualify a route for designation as a bike route" (page 60), we feel it is appropriate that the plan specifically include the following from the AASHTO Guide for the Development of Bicycle Facilities:	An update to the AASHTO Guide is currently under development. We encourage the use of current and applicable guidance.
		"Generally speaking, roadways that carry very low to low volumes of traffic, and may also have traffic typically operating at low speeds, may be suitable as shared lanes in their present condition. Rural roadways with good sight distance that carry low volumes of traffic and operate at speeds of 55 mph (89 km/h) or less may also be suitable as shared lanes in their present condition. Such roads often provide an enjoyable and comfortable bicycling experience with no need for bike lanes or any other special accommodations to be compatible with bicycling. If they provide a route for continuous travel, these roads can also be used as an alternative to busier highways or streets. For example, a narrow and curving rural road with low traffic volumes can be a very suitable and popular bicycling route, and may be preferable for some bicyclists as compared to a high-speed, high-volume highway with good geometrics and shoulders - as long as the road serves as a convenient through route to the desired destinations. Outside urban areas, these types of roads may comprise a high percentage of popular or designated bicycle routes, and may be appropriate for designation as a local, state-level or U.S. Bicycle Route." (AASHTO Guide for the Development of Bicycle Facilities, p. 4-2)	
		Lastly, we encourage the plan to provide more constructive guidance on rumble strips and their impacts on cyclists. We appreciate that the plan currently touches on the importance of proper placement of rumble strips, so as to provide adequate shoulder space for cyclists to ride safely. However, it's important to also stress the need for oversight throughout roadway projects, to ensure that rumble strips are actually installed in a way that is safe and accommodating for people on bicycles. In this context, it would be appropriate for MDT to have a committee to provide said oversight, particularly if the committee includes one or more members with authority to influence roadway projects through to completion and secure the safety and comfort of cyclists on Montana's roadways. Convening a state bike and pedestrian advisory committee would also go a long way to ensuring that roadway projects yield the best possible results. Thank you for your consideration of these comments and for supporting bicycle travel in Montana. Please don't hesitate to email or call with questions.	Thank you for your comment. Section 4.4 of the Plan speaks to some of the tradeoffs of rumble strips between vehicles and bicycles. The MDT Rumble Strip Guidance provides criteria for installation of shoulder and centerline rumble strips on state highways.
18	5/3/2019 Brian Marotz	I live in Kalispell and commute to work via bicycle on most ice-free days. While Kalispell is beginning to become aware of the need for bike lanes and trails, our community has a ways to go, like many Montana cities. I'll draw your attention to intersections where the bicycle lane (if one exists at all) is located to the right of the auto right turn lane. Bicyclists attempting to go straight through the intersection are at great risk of cars passing and then turning right, cutting the biker off. An example is Hwy 93 and 2, going south on 93. Worse yet, there is	of these issues. They are intended to offer guidance to
		no bike lane or sidewalk south of the crossing. When the light turns green, bicyclists must hold back until all the right-turning cars whiz past before proceeding straight. By then, north bound autos begin turning left across the path of south bound bicyclists. Someone is going to get run over.	
		Another bad spot is on the well-named Cemetery Road that leads to the bike paths along the bypass. Cemetery Rd has narrows hemmed in by guard rails. Bicyclists have mere inches when cars pass at 45 mph. Visibility is poor because the road has hills. There should be a	



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		bike lane on the outside of the guard rails or an alternate route in narrow stretches.	
		Those a just two examples of dangerous intersections and narrow roads with no shoulders that need a better solution for bikes and pedestrians. I urge you to identify these situations and creating a safe lane for bicycles.	
19	5/4/2019 Dale Fellows	Lots of cyclist commuter types in Red Lodge that do wheelies and endos on the side of the street. Just sayin.	Thank you for your comment.
20	5/4/2019 Marilee Brown (Galla10 Alliance for Pathways)	Thank you for allowing us to comment upon the Draft Montana Pedestrian and Bicycle Plan. We would like you to consider the following comments and hope you make the appropriate changes. Overall the plan seems to be very well thought out. Galla10 Alliance for Pathways is an organization located in Bozeman Montana that is actively promoting the construction and maintenance of Separated Pathways to connect communities and local developments. We have almost 3,000 members. Over the last few years we have found that there is a great deal of conflict between the various governments and jurisdictions in implementing and maintaining safe facilities. We hope that your document can help to resolve some of these difficulties. General Comment: (Please add in the appropriate section) – Shared use paths should be encouraged for connectivity in Urban settings or when a Rural Area is expected to become Urban within the next 10 years. Page 15 (general comment) Instead of comparing number of vehicles per household (where one vehicle is used for multiple drivers) it would ve been helpful to know what percentage of adults in the state of Montana actually have a current drivers license. We believe that this data would have shown that there are many more individuals (rather than 5% of households) that need alternative non-motorized transportation. Page 20 (general comment) The Bicycling the Big Sky map promotes using Interstate shoulders as a cycling facility. This seems dangerous and alternatives should be found. Shoulders instead of separated paths on high-speed routes are not safe and contrary to the rest of this document. Page 21 (general comment) The Bicycling the Big Sky map promotes using Interstate shoulders as a cycling facility. This seems dangerous and alternatives should be found. Shoulders instead of separated paths on high-speed routes are not safe and contrary to the rest of this document. Page 21 (general comment) The documentation on spending per capita for walking and biking infrastructure is misleading si	Thank you for your comment. The Plan was developed in coordination with multiple entities and seeks to serve many needs. The language was thoroughly vetted through the Steering Committee to arrive at content that all entities could agree to. The Plan recognizes the benefit of separated facilities in appropriate locations/settings, this includes shared use paths. The most appropriate facility type may depend on a number of factors including context, users, traffic volumes and speeds, constraints, and other considerations. The Plan recognizes the many needs and challenges that exist. This data is not available from ACS. Montana is one of five states where it is lawful for bicyclists to ride on all public roadways. The map is intended to be used as a tool to provide bicyclists with information, so they can choose routes based on their comfort level. Suggestions to improve shoulders and facilitate bicycle travel are listed in the strategies. More detailed bike/ped spending is not readily available.
		Page 22 Roles and Responsibilities (general comment) Your document states that "Ultimately, city, county, and tribal governments are responsible for pedestrian facilities". But one of	



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		the biggest issues that we have noticed is that at the County level, there is no way to set aside right-of-way along "rural" roads for eventual development – especially along State roads that might require widening in the future. And similarly, the MDT does not have the right to purchase right of way for its roads without a project being funded. MCA 7-15-4125 states that the "City or Town" has the power to require a property owner to repair facilities not the County or State. On page 27 under Land Use, you partially address growth.	Local governments have the power to require developers to provide pedestrian and bicycle infrastructure as part of the permitting process.
		We suggest state laws need to change for State and County governments to anticipate needed easements for future growth. And we also suggest that the State find ways to encourage Counties and Cities to provide facilities through funding and other rewards.	Land use decisions are made by the local governments, not the state.
		The State seems to be washing its hands of any responsibilities and yet it has far more resources allowed under the law than the Cities and Counties. Additionally, we feel strongly that the State should lead by example through it's policies that bike and pedestrian infrastructure should be included and funded in all State and Federally funded projects within an urban or anticipated urban area.	
		Page 25 funding (general comment) TA funding seems to have dried up. This is the second year in a row where no new applications will be accepted. This should be stated in this document. TA funding needs to be made a priority and increased since it is a resource that State law allows Cities to use for appurtenances that are not attached to roadways (unlike other funding from the State). There seems to be a conflict in what this document is encouraging and yet what it disallows through lack of funding.	All TA funds received in Montana have been awarded.
		 Page 40 Strategy 1A Roles and Responsibilities (please add): Consider latent demand and by adding pedestrian crossings at signalized intersections. Consider future needs where road upgrades adding roundabouts or signalization and include facilities such as ramps in anticipation of future connections. (This will save money in the long run – it is more costly to tear out and add such facilities at later dates). 	The strategies in the Plan were vetted through the Steering Committee to arrive at content that all entities could agree to. Latent demand at intersections is addressed in Strategy 1E (bullet point 2).
		Page 41Strategy 1B Roles and Responsibilities (last item): Consider requiring construction of appropriate non-motorized infrastructure as part of local and rural development. (Include County)	"Local development" includes cities and counties – both the urban and rural environments.
		Page 42 Strategy 1C Roles and Responsibilities (please add): Consider latent demand and how choices of transportation should be included when development is quickly growing in both rural and urban environments.	
		Page 43 Strategy 1D Roles and Responsibilities (please add): Include active transportation signage in the Drivers test and booklet.	
		Consider paint markings of bikes on shoulders such as the interstate.	Strategy 2B includes an action item: "Enhance state driving test to include improved pedestrian and bicycle education in driver training."
		Page 60 Strategy 5D (please add): Include separated shared-use pathways when reconstructing state roadways especially when in close proximity to/between urban roads and cities. Consider terminating paths and sidewalks safely on newly constructed shoulders and shared-use facilities so that cyclists and pedestrians are not stranded.	Strategy 1C addresses abrupt termination of non-motorized facilities. The public can report access issues via MDT's External ADA
		Page 64 GOALS (please add): Consider a process where the public can report access difficulties State wide (not just for schools etc.)	webpage: https://www.mdt.mt.gov/business/contracting/civil/external-ada.shtml



	General Comment: Please remember that the State (not just other governments and agencies) also should consider that buffered paths or shared use paths on arteries should be planned for or installed when repaving or constructing it's own roadways. There are plenty of examples where Bozeman in the last few years on State Highways (Main, Huffine, 19th) in an Urban or soon to be Urban area have been repaved or reconstructed without any connecting bike facilities either buffered or non-buffered. Funding for such needs to be included on all projects in the future.	
5/5/2019 FWP	a. FWP supports MDT's Vision Zero initiative to reduce pedestrian and bicyclist fatalities and injuries. b. We appreciate that the vision in this plan is for a pedestrian and bicycle transportation network that provides for environmental stewardship. We suggest adding a goal and strategies that address the need to plan bicycle and pedestrian facilities, and public use of those facilities, such that ecological functions and important fish and wildlife habitats are conserved. We hope to have the opportunity to discuss implications of plans that may include the development of recreational paths into wildlife habitats. Goal 2: Educate, encourage, and promote safe and responsible travel practices of motorists, pedestrians, and bicyclists. (Page 46) a. Strategy 2A: We support evidence-based decision making and data collection practices as referenced throughout the plan and in this strategy. b. Strategy 2B: We hope to collaborate with MDT on trails and recreation planning. We are interested in partnering on bicycle/pedestrian education opportunities (e.g. promoting education and awareness on bicycle safety in our state parks). c. Strategy 2C: We would like to share knowledge on planning and design issues (e.g. sharing the location of current and proposed hike/bike campsites in state parks with regional staff). Goal 3: Preserve and maintain pedestrian and bicycle transportation system. (Page 50) a. We strongly agree that preservation and maintenance is a key consideration when constructing and designing any transportation system. Goal 5: Support walking and bicycling as important transportation modes for access to destinations, economic vitality, and health. (Page 56) a. Strategy 5B: We suggest FWP's Recreational Trails Program be added to this strategy. Specifically, "Continue to make 100 percent of TA and RTP funding available for eligible activities and avoid transferring funds to other programs." This will allow for maximum flexibility in funding bike and pedestrian transportation systems. b. Strategy 5C:	Change: Add a paragraph in the additional considerations (Section 7.3, pg 66) called "Impacts": Construction of non-motorized facilities is subject to applicable design and implementation regulations and requirements. Projects should consider all impacts the project may have on the environment and the community prior to implementation. In order to realize the maximum benefit from new infrastructure, projects should also be resilient to extreme weather events and natural disasters as appropriate. Thank you for your support on these strategies and your willingness to collaborate and share knowledge. Strategy 5B is focused on funding for transportation related projects. As such, reference to RTP is not recommended here. Change: Revise as requested.
	Pedestrian Plan.	
	5/5/2019 FWP	paths on arteries should be planned for or installed when repaving or constructing it's own roadways. There are plenty of examples where Bozeman in the last few years on State Highways (Main, Huffine, 19th) in an Urban or soon to be Urban area have been repaved or reconstructed without any connecting bike facilities either buffered or non-buffered. Funding for such needs to be included on all projects in the future. 5/5/2019 Overall a. FWP supports MDT's Vision Zero initiative to reduce pedestrian and bicyclist fatalities and injuries. b. We appreciate that the vision in this plan is for a pedestrian and bicycle transportation network that provides for environmental stewardship. We suggest adding a goal and strategies that address the need to plan bicycle and pedestrian facilities, and public use of those facilities, such that ecological functions and important fish and wildlife habitats are conserved. We hope to have the opportunity to discuss implications of plans that may include the development of recreational paths into wildlife habitats. Goal 2: Educate, encourage, and promote safe and responsible travel practices of motorists, pedestrians, and bicyclists. (Page 46) a. Strategy 2A: We support evidence-based decision making and data collection practices as referenced throughout the plan and in this strategy. b. Strategy 2B: We hope to collaborate with MDT on trails and recreation planning. We are interested in partnering on bicycle/pedestrian education opportunities (e.g. promoting education and awareness on bicycle safety in our state parks). c. Strategy 2C: We would like to share knowledge on planning and design issues (e.g. sharing the location of current and proposed hike/bike campsites in state parks with regional staff). Goal 3: Preserve and maintain pedestrian and bicycle transportation system. (Page 50) a. We strongly agree that preservation and maintenance is a key consideration when constructing and designing any transportation system. Coal 5: Support walking and bicycling as important



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22	5/5/2019	Hello, and thank you for taking first steps to develop a Montana Pedestrian and Bicycle Plan.	Thank you for your comment.
	Jennifer Drinkwalter	As a resident of a rural community with many tourists and wildlife, I urge you to to be aggressive with rumble strips, speed limits, bike share on the highways (or paths where possible and funds allow).	
		Specifically (I realize this is the plan to guide and not to solve each problem area, but the example helps) Red Lodge sees RV's, motorcycles, bicycles and rented vehicles touring Beartooth Pass, Highway 78 from RL to Roscoe/Absarokee, RL to Bearcreek and RL to KOA Campground and fishing accesses off of 212. Speed limits are upwards of 70 mph, no share the road signs and very little wildlife crossing signs. The improvements on Hwy 78 to 6 miles out of town are better with a widened shoulder, lower speed limit and somewhat properly placed rumble strips. 212 does not slow traffic until the hospital. The entire corridor from Roberts to Red Lodge has MANY turns. Please look at the speed from 6 miles (KOA) to Red Lodge, it needs to be reduced for local traffic, tourism and pedestrians.	This is a policy-based plan which is not intended to identify specific projects. We hope that the strategies that have been provided will address some of these issues. They are intended to offer guidance to localities to resolve existing safety concerns and avoid some of these mentioned issues in future projects.
		As Montana increases in tourism, bicycling areas like Red Lodge will only get more attractive and busy. We need to think 20+ years ahead for wider shoulders - not just "where possible". This must be mandatory for areas with significant tourism and bicycle corridors as you not in your plan. It just needs to be more aggressive. There should be a timeline in place for changing these dangerous situations to safer places. For locals and tourists - cars, RV's, motorcycles, bikes. 70 mph speed limits have no place in these areas.	
		Please implement the Bike/Ped coordinator as soon as possible. We need a dedicated position in our state for this.	The duties of this position are currently being filled by MDT.
		Rumble strips and shoulders. While I commend you all for pointing out the differences and stating what solutions are for areas with low shoulder width, there should never be an option to rumble strip the middle of the shoulder. That option should be taken out. If there is only a 2' shoulder, then the rumble strip should always go on the white line. Obviously we all want 4' shoulders for safety in cars, bikes, RV's to pull over, etc. (especially in our busy tourism areas), but when not possible, at least always require the rumble strip to give pedestrians a chance to be on the road.	Section 4.4 of the Plan speaks to some of the tradeoffs of rumble strips between vehicles and bicycles. The MDT Rumble Strip Guidance provides criteria for installation of shoulder and centerline rumble strips on state highways.
		Ruble strip placement on the white line and center line is also better for the safety of the vehicles as well when winter driving, driving in the dark and foggy conditions.	
		Thank you for the opportunity to comment. I look forward to the next draft.	
23	5/5/2019 Ralph Zimmer (Bozeman Pedestrian	The Bozeman (Area) Pedestrian and Traffic Safety Committee (PTS) is an official advisory body to the City of Bozeman, County of Gallatin, and Bozeman School District. We appreciate the opportunity to comment on the draft Statewide Bike/Ped Plan.	Thank you for your comment.
	and Traffic Safety Committee) Submitted 3	Unfortunately, my computer apparently died late last night and I am relying on my wife to send these comments since my vision precludes me from reading the screen on any other computer than my own.	
	times	Just before my computer apparently died, I was privileged to read the comments submitted by the Galla10 Alliance for Pathways (GAP). PTS generally agrees with those comments and urges you to make the recommended changes.	
		Separated paths have significant safety, health, transportation, and recreational value over roadway shoulders. These advantages appear at several points in the draft plan but, as pointed out in GAP's comments, such benefits are unfortunately not consistently apparent throughout the entire document. We encourage you to	The Plan recognizes the benefit of separated facilities in appropriate locations/settings, this includes shared use paths. The most appropriate facility type may depend on a number of factors including context, users, traffic volumes and speeds, constraints, and other considerations. The Plan recognizes the many needs and challenges that exist.



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		include a list of the safety benefits of separated paths in the draft plan. A partial list of those is:	
		 Trash, automobile parts, etc. accumulate on shoulders making bicycling and even walking potentially hazardous. Young bicyclists and pedestrians are more inclined to wander from a straight and narrow path potentially stepping into the path of a passing vehicle. Blind or virtually blind pedestrians are particularly susceptible to wandering from a straight and narrow line potentially suddenly veering into the path of a vehicle. Some path occupants will be accompanied by a pet animal. When the path is on the roadway shoulder, whether leashed or not, those animals sometimes suddenly dart to the side. If that side motion takes the animal into or even just near a vehicle's path, the result could be disastrous. When a bicyclist "hits" some debris, the bicycle sometimes suffers an immediate and totally unexpected change in direction. If the bicycle is on the road shoulder, that change could take the cyclist directly into the path of a passing vehicle. If the path is on the road shoulder, any vehicle stopped on the side of the road because of mechanical problems or a law enforcement stop creates an obstruction that often forces the non-motorized user on the shoulder to have to enter the actual roadway to get around the obstruction. Non-motorized users on a separated path are exposed to less exhaust fumes and other intoxicants and thus are in a healthier environment. Non-motorized users on the shoulders of roadways have reported bottles and cans being thrown at them by passing motorists. The greater the separation between the traffic lanes and the location of any non-motorized users the less likely objects will be thrown at them and, if objects are thrown, the non-motorized users will have longer time to spot the objects and take evasive action. Passing motorists sometimes suddenly veer off the roadway onto the shoulder because of a mechanical problem, a medical problem, or some diversion in the vehicle. An	
		The internal policies on separated paths that MDT adopted over a year ago seem to unnecessarily discourage rather than encourage separated paths. We urge that those provisions be scrutinized and revised. The draft plan should encourage that review.	
		Thank you for your consideration of the above comments. We look forward to seeing the final plan.	
24	5/5/2019 Heidi Gilbert	Just wanted to add my two cents about accommodating bikers and pedestrians on Montana roadways, specifically rural areas.	Thank you for your comment.
		I live in red lodge and often ride along the highways to access both mountain bike trails and gravel roads. It is really scary to have people fly by you going 70 mph, the wind will suck a bike in towards their vehicle. So first and foremost I would like to see slightly lower speed limits in some areas adjacent to town. I really appreciate having alternative pathways to avoid that situation	This is a policy-based plan which is not intended to identify specific projects. We hope that the strategies that have been provided will address some of these issues. They are intended to offer guidance to localities to resolve existing safety concerns and avoid some of these mentioned issues in future projects.



ID	Date/Name	Comment	Response
		altogether, but I know sometimes this is not always financially viable. However, there are a few areas that I believe should have this. The area along hwy 212 into red lodge has a portion but it is not complete. I would like to see that connectivity improved. I would also like to see one side street through town designated as a bike path, protected with all intersections having a stop sign in place. Another area I feel could be improved is ski run road heading up toward the ski area. A wider shoulder along tucker flats and into the west bench would be wonderful. Of course pathways aren't necessarily affordable so I would love to see rumble strips placed ON the white line to give me a tad more space and create driver awareness of the shoulder. Thanks you for considering us and our safety.	The MDT Rumble Strip Guidance provides criteria for installation of shoulder and centerline rumble strips on state highways.
25	5/5/2019	The comments below assumes that State MDT involvement would	Thank you for your comment. Section 4.4 of the Plan speaks
	Robert Rasmussen	not add significant cost or time to the selected project. I have heard that the centerline rumble strips are effective for motor vehicles; please address how lane edge rumble strips affect bicyclists and pedestrians, as well as sweeping and other maintenance.	to some of the tradeoffs of rumble strips between vehicles and bicycles. The MDT Rumble Strip Guidance provides criteria for installation of shoulder and centerline rumble strips on state highways.
		Maintenance is an important issue. I encourage MDT to continue its policy of requiring other entities to take on maintenance responsibilities for off-highway trails/separated path facilities when safety is not an issue.	Preservation and maintenance of pedestrian and bicycle facilities are discussed as part of Strategy 3A.
		The final plan should be more descriptive of how it will be implemented. Please add an implementation schedule with a timeline for specific benchmarks and actions. Provide clear direction on how MDT district offices will integrate this into their site specific planning, construction and maintenance operations. Show how Montana's ped/bike system will grow in the implementation section. State highways are the backbone of our ped/bike transportation system and MDT, as the primary transportation entity in Montana, should have a strong and recognizable program both for MDT action and in support of other agency, local government and citizen action.	The language in the Plan was vetted through the Steering Committee to arrive at content that all entities could agree to. Each entity will be responsible for implementing applicable strategies and setting specific benchmarks, if desired. The Plan is intended to be a resource to be used by MDT and its partnering agencies as they work to fulfill the needs of pedestrians and bicyclists.
		The final plan should measurably lead to more public engagement and participation. It should foster and direct more multi-level transportation community coordination, cooperation and quantifiable outcomes. Each District office should have a designated bike/ped staff person to advise and assist the District manager in plan implementation with specific expertise in complete streets, active transportation, project management including ADA compliance and, most importantly, the ability to serve as a public point of contact for non-motorized transportation.	
		More data is needed on statewide bicycle counts and I recommend strengthening/creating a statewide non-motorized count program. The final plan should create policies to connect to existing or planned trails when constructing new or re-constructing adjacent roadway.	"Encourage statewide, MPO, or community level travel surveys and standardized nonmotorized data collection programs to gauge local transportation habits and establish trends over time." is listed as an action item under strategy 2A. Bike/ped accommodations are considered by MDT in all new construction/reconstruction projects, however,
		I would discourage the MDT policy of not allowing longitudinal trails/separated paths along MDT routes.	feasibility/community buy-in/funding are often limiting factors.
		Page X. First paragraph. Delete word recreation. Although this is true, the plans scope is transportation, not recreation.	This Plan is intended for use by both MDT and its partners and as such, acknowledges how transportation and recreation overlap.
		Page 9 • Second bullet. "Evaluation is on a case-by-case basis to understand context." How is this addressed in the implementation of the plan? What specific processes are laid out to direct district offices to do so?	This is in reference to the many processes MDT has in place including project review by the Rumble Strip Committee, a safety analysis, traffic analysis, public involvement, etc.
		Page 21	



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		 3rd paragraph – Add that RTP program funds are allocated through the State Parks Citizen Trails Advisory Committee. 4th paragraph – Note that BACI is no longer being funded as a program. Thanks for the opportunity to comment.	Change: "Montana State Parks collaborates with the State Trails Advisory Committee to review the RTP applicants each year. Decision makers" The BACI workshops are no longer funded however, DPHHS still provides resources/materials on the BACI.
26	5/5/2019 Sheelia Miller	This is Sheelia Miller, Mineral County. I am sorry we are missing this deadline. I finally got my friend to draw the proposed trails from St Regis to Alberton. They are on 36X44 size maps we got from the Forest Service. I intend to take them to Rails to Trails in Three Forks on the 8th, this Wednesday. I will be going into Missoula Tuesday and plan to get a couple copies made one for you (MD of T) and one for Rails to Trails. Keeping one for the Forest Service. Feel free to call me at 546-5484 any time. Our timing stinks. At least we are working on it. I don't see my partner in this project which makes it difficult.	Thank you for your comment. This plan is a policy-based plan which is not intended to identify specific projects. We hope that the strategies that have been provided will address some of these issues. They are intended to offer guidance to localities to resolve existing safety concerns and avoid some of these mentioned issues in future projects.
27	Jean Belangie-Nye	Thank you and your team for all of their great work. I would like to congratulate the MDT and all of the folks who put together Montana's first Pedestrian and Bicycle Plan. With that said I will attempt to be succinct and not delve into the minutia of problems with alternative transportation problems in Montana. Bike-Ped issues are not new to me. Advocating for shared use paths for all users goes back to Highway 93 South and the 2-lane 4 lane controversy. I chaired 3 focus groups and served on the Concerned Citizens Advisory Council. I was part of Team Tiger for the Bitterroot-Missoula Trail and now chair the Bitterroot Trail Preservation Alliance (a Friends Group). Vision Zero and its goals in terms of biking and walking are appropriate and attainable. The Complexities and Challenges are specific and to the point. Montana is a huge diverse state with a low population and limited funding. The Draft program is clear and concise. The strategies, implementation, and next steps are clear. However, as a user of Montana's highways and trails and a partner in planning and implementation, I found one area that was not addressed and that is the climate of MDT in terms of dealing with walking-bicycling public. I am always astounded when someone at a meeting, statewide or regional, tells another tale of how their District is not responsive. Maybe it was the 93 South Lawsuit, but I have always found the District 1 folks accessible and willing to listen. The same goes for the State folks that I have dealt with. So, I was somewhat blown away when the lawyers sat in on a discussion of major repairs for the Bitterroot Trail. By the way, we have never had a response to our letter about said repairs. I know money is the issue and it is limited but Safety is a Priority. (Footnote: I was a 4-laner in the 2-laner discussion.) Comments regarding the strategies for implementation if there is no comment it means I think it is very appropriate. Strategy 1A: Improve safety at intersections through applicable design standards and	Thank you for your comment.



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		 Consider intersection designs such as roundabouts and protected intersections where appropriate. Education for seniors is vital for their comfort and safety. Consider feasibility of "No Right On Red" signage at urban signalized intersections where high volumes of pedestrians and bicycles are present. Or when said intersection has a high accident rate. 	Change: Consider feasibility of "No Right On Red" signage at urban signalized intersections with a history of non-motorized crashes and/or where high volumes of pedestrians and bicycles are present.
		Strategy 1B Consider sidewalk and bike lane widths greater than minimum standards when feasible and appropriate to meet demand. Sidewalks should be wide enough for a wheelchair and stroller to pass comfortably. Consolidate driveways and accesses to reduce the number of conflict points for pedestrians and bicyclists. This should also apply in rural areas. Consider requiring construction of appropriate non-motorized infrastructure as part of local development. Missoula is an example of the "no sidewalk" mentality. I guess the argument should be pay up front rather than later.	
		Strategy 1C: ROLES AND RESPONSIBILITIES: State and local agencies should consider the level of pedestrian or bicycle activity that is existing or anticipated on rural roadways and use it in their decision making for capital projects and maintenance planning. Eastside Highway in the Bitterroot is an example. 12% growth rate per year. At least put in a foot print as the road is widened. Note: a 3-laner received an F on Highway 93. Regularly examine roadways during surface preservation to adjust rumble strip location if feasible. Include accident analysis maybe a center line rumble strip is more appropriate. Consider bicycle travel when planning for shoulder expansion of roadways. Also give the pedestrian a safe spot. Consider future growth in design for urban/rural fringe. In the long run this saves money and lives.	Change: Consider bicycle and pedestrian travel when planning for shoulder expansion of roadways.
		 Solicit support for methods for reducing speed limits on local streets outside of school zones. Speed studies are not the only consideration, Accident rate, use, population should be part of the study. Unfortunately, Lolo is on a Federal speedway. Solicit support for a "safe passing law" aimed at defining lawful behavior by motorists overtaking bicyclists. Wasn't this passed? Study emerging technology such as e-bicycles, e-scooters and other electric devices. The 2015 bill that defined electric bicycles as having the same rights and responsibilities as a standard bicycle may not be expansive or nuanced to consider all applications of emerging technology. Study and address use of electric mobility devices as modes of transportation, including rights and responsibilities. Lot of confusion of these two. More communication from MDT or whomever on this one. 	
		1E great! 1F Add: Consider visibility of clothing, type of lights on the bicycle. I know when researching this information that some counties noted it and other did not. What a great visibility campaign one could put together with the information.	
		2A Sounds good to me! 2B Consider prioritizing pedestrian and bicycle education and encouragement. YES! Coordinate education and encouragement campaigns among agencies to focus on underserved and disadvantaged Montana communities. Include helmet and light give aways.	



ID	Date/Name	Comment	Response
		 Share information with the public and appropriate agencies on various safety improvements, new technologies, and changes in traffic control methods. YES! Consider support for requirements to retest drivers for license renewals at regular intervals to stay up to date on current laws and regulations. I have been driving for 50 plus years and have taken only one written test. Consider making drivers ed a requirement for all high school students. 2C Looks good! 3A Routine Maintenance: Work with local Friends groups to coordinate maintenance efforts Capital Maintenance: When repair the main highway include the adjacent shared use pathways and trails in the bid. 3B Develop MOU's between friends groups, counties, and the state to define rolles in the care of shared use pathways. Goal 4 looks good! Goal 5 This is a repeat! Sidewalks should be wide enough for a wheel chair and stroller to pass comfortably. 8 to 10 feet! It is a safety issue. I should not have to step into a street because the sidewalk is not wide enough for 2 people, Good Job! As a citizen I am willing to advocate for pedestrian and bicycle facilities and safety. I would rather have my tax dollars go for alternative transportation than the medical costs for a serious TBI plus major physical injuries. I hear the bill for a year is now running between seven and ten million dollars per critical accident. Thanks for your efforts and work.	
28	5/5/2019 Aaron Wilson (on behalf of Missoula City, County, and MPO staff)	City, County and MPO staff gathered the following big-picture comments on the draft plan. Although you have the draft written, we collectively believe there are some core issues that should be addressed before you finalize and adopt. This document will be critical to building modern infrastructure and facilities throughout Montana, so care should be taken to get it right. Please reach out if you have questions or would like to discuss these comments further. Big Picture Recommendations for the Montana Pedestrian & Bicycle Plan: Need for action steps throughout. How is MDT planning to implement this plan? We all know that a plan is only as good as its implementation, so what are your specific actions/strategies/steps? Issues with HSSRA policy – MDT typically requires local governments to be responsible for maintenance of bicycle and pedestrian infrastructure, essentially treating those improvements as an amenity rather than an integral part of the transportation network. How is that being addressed with this plan? Elaborate on the social, economic, and environmental benefits of walking and biking.	



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			trips, or those areas likely to have shorter trip lengths, can help to leverage these benefits.
		Greater focus on design standards and best practices and also consider the different needs of urban and rural roadways (Design Hierarchy). Not all streets are created equal - it would be great to see MDT recognize that in this plan. What gets designed in the urban areas will likely be different that what gets designed along rural highways. Have different standards for each.	An update to the AASHTO Guide is currently under development. This update will have information for the differing needs of urban and rural roadways.
		 Stronger language – move away from the term "consider" or "where possible" and support improving conditions for all users of all abilities (i.e. move towards a complete streets policy). Use goal-oriented language that is actionable. Don't qualify. We all understand that design needs to be context-sensitive, but that doesn't mean you can't make bold statements and clear actions. 	The Plan was developed in coordination with multiple entities and seeks to serve many needs. The language was thoroughly vetted through the Steering Committee to arrive at content that all entities could agree to.
		 Make a deliberate effort to expand the network rather than making improvements when mv centric roadway projects come along (i.e. make those missing connections and refrain from creating a patchy network). The State should have a larger role in bicycle and pedestrian data collection efforts (providing counters, maintaining statewide database, provide training, setting methodology, etc.) or at least set standards for localities to follow. Create the program and integrate it with the urban traffic count program. 	Strategy 2A seeks to standardize data collection programs and encourage all entities to collect data.
		 Don't wait from local agencies to do the work first. Discuss and connect with the organizations making positive impacts on the bicycle and pedestrian community (e.g. Adventure Cycling) and highlight their work. Discuss of micro-mobility/shared micro-mobility and emerging 	Stakeholders such as BikeWalkMT and Adventure Cycling were invited to the open house workshops and gave input there. Strategy 1D addresses legislative considerations for emerging
		 technologies. Acknowledge differences in ability levels (e.g. "four types of cyclists") and discuss the important impact safe and protected infrastructure has on increasing rates of bicycle and pedestrian activity. 	technologies (e-bikes, e-scooters, etc.). Section 3.2 provides discussion on facility types and users.
		 Create criteria for Urban and for Rural. Perhaps consider potential for mode split with urban areas or overall importance of route statewide (examples Great American Trail, US Bicycle Routes, Adventure Cycling Tourism Routes) Develop Levels of Service related to VMT, Equity, and movement of people, not just vehicles. Particularly within urban areas, consider multi-modal level of service or other analysis, not just vehicular LOS. We are never going to keep up with continued growth in vehicular traffic, so lets acknowledge that and move towards a more efficient model. Address E-bikes and other emerging technology. Edit per recent legislation such as SB-24. Recognize existing MPO LRTP plans. How is this plan supporting your MPOs, Counties and Cities? Overall, I think you've got a lot of great information in the plan and we really appreciate the direction it should be taking the state. However, we hope you'll take these comments seriously and consider ways to address them before adopting the final plan. As always we are happy to offer input or assistance where it is helpful. 	Please refer to other guides and manuals. The 2010 Highway Capacity Manual addresses multimodal mobility analysis. Strategy 1D discusses the need to study electronic devices such as e-bikes and e-scooters. Strategy 5E recognizes the role of local transportation plans.
29	5/6/2019	Hopefully this makes more sense than last evenings babble.	Thank you for your comment. This is a policy-based plan
_•	Sheelia Miller	At 2:00am I had an ah ha moment. I could use technology to get the information to you. Brilliant don't you agree? Now all I have to do is find an entity that can fax something 36X44. Superior is small but we have the Extension office, the Planner, the Forest Service. If none of those can help I have been to the DOT in Missoula and	which is not intended to identify specific projects. We hope that the strategies that have been provided will address some of these issues. They are intended to offer guidance to localities to resolve existing safety concerns and avoid some of these mentioned issues in future projects.



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		that is do-able for me. Nothing opens until 8 am so I will do the waiting game.	
		What I was attempting to say is my friend is a very busy man and our schedules rarely coincide. He has been on all the routes and I have not. We met with Heather Berman at the Forest Service and got some maps. Then the government shut down and everyone was playing the catch up game and somewhere life episodes took over. Expect the unexpected. Some is good and some not but we deal with it all.	
		I also have the Elementary Principal getting a Bicycle Club started.	
		I forgot the name of the young woman who came to Mineral County last year and spent time running around with me. We had some great chat time. If I recall correctly she said if we get anything down it would be helpful. So whether she said it or I made it up, here is what we have at present.	
		As you are aware there aren't too many options for a trail to go, and there are some snags, I hope we can work them out with time and assistance.	
		We focused on St. Regis to Alberton because there is a group working on the east end of the Hiawatha trail to St Regis from the west.	
		The pink marked is the most user friendly on most of the route. Yellow indicates other possible options. There are parts paved and parts with gravel. Signage will be the key as you know better than me.	
		From Alberton to Huson	
		Back roads beginning in the town of Alberton At the edge of town there is a fork in the road The one to the right takes you to the highway The one to the right goes to Nine Mile where Nine Mile House (restaurant) burned down a year or so ago Turn east near the Post office and it takes you to Huson right where the New Frenchtown trail stops.	
30	5/6/2019 Kristen Hollum	Thanks for being such a bike-friendly state! I live in Red Lodge and ride my bike to work and for exercise. It has come to my attention that MDOT is seeking comments regarding widening shoulders and rumble strips on Rural Roads. I support having a rumble strip for the safety of vehicles, however, I think the best place for the rumble strip is directly under the white line marking the edge of the road. This is a great compromise for both safety of vehicles and safety of bikers. The shoulders are narrow (I know widening them can be expensive) and filled with lots of debris and sometimes cracks. Adding a rumble strip only reduces the safe travel options for bikers and ends up with biking in the lane of traffic on rural roads. This irritates cars and is not a safe options for cyclists, but is often safer than the conditions that exist on some stretches of road. The roads I most often bike are Highway 78 from Red Lodge to Columbus, Highway 212, and Highway 308 to Belfry (212 is my route for work and exercise). Thank you for your consideration of bikers and pedestrians. Active transportation will only continue to grow in our great state, and if we can all compromise, we can create a safe and efficient plan for	Thank you for your comment. Section 4.4 of the Plan speaks to some of the tradeoffs of rumble strips between vehicles and bicycles. The MDT Rumble Strip Guidance provides criteria for installation of shoulder and centerline rumble strips on state highways.
31	5/6/2019	everyone. Comment or Question:	Thank you for your comment. Section 4.4 of the Plan speaks
J 1	Nick Gaddy	Commenting on the Montana Pedestrian and Bike Plan. I would like to see any rumble strips added to Rural Roads be under the	to some of the tradeoffs of rumble strips between vehicles and bicycles. The MDT Rumble Strip Guidance provides criteria



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		white line, rather than inside the shoulder. The space is already small for bikes and often has dirt and debris, so adding a rumble strip would make it more difficult to bike safety with cars. I ride on Highway 212, 78, and 308. Thanks!	for installation of shoulder and centerline rumble strips on state highways.
32	5/9/2019 Marlena Lanini	If public comments are still open, I would like to submit the following comments. First, thank you for developing this plan! I agree with the goals and the substance of the plan. I strongly believe in access for all individuals and was happy to see inclusion of accessibility recommendations from ADA and other resources. I believe universal design principles will make public spaces more easily used by all Montanans. Strategy 1A: Safety at Intersections: This section states: "Consider intersection designs such as roundabouts". For roundabouts with high speed roads, crossing in the pedestrian cross walk is very dangerous and I would like to see roundabouts include some protection for pedestrians and bike riders. I believe that flashing lights to stop traffic or even tunnels to by-pass the high speed roads at intersections would greatly improve safety at high speed roundabout intersections. Please consider adding language to further increase the safety at these type of intersections. Here is an example of the safety issues I see roundabout intersections with high speed traffic (anything above residential speed limits). In Billings Shiloh Road (highway 302) has an excellent multi-use path. My family uses it for for walking and bike riding. Additionally, it is located near several assisted and independent living facilities and I often see older adults who use walkers, canes or wheelchairs utilizing the trail. There is a significant safety issue at the intersections with larger, high speed roads like Grand Ave, Central Ave, and King Ave. There is a lot of traffic, traveling at high speeds and it is difficult as a pedestrian to cross the multi-lane roads at the roundabout fast enough while timing a break in traffic. This is especially difficult for pedestrians who cannot cross at fast speeds such as children and older adults. As a driver, it is difficult to yield to pedestrians because you cannot see them clearly until you are very close to the crossing, which doesn't leave much time for stopping.	Thank you for your comment. It is our hope that all of the strategies and corresponding action items will be interpreted as a whole. The Plan gives recommendations for non-motorized crossings on major roadways and various ideas for increasing pedestrian visibility. Appropriate intersection crossing treatments are evaluated on a case-by-case basis, including at roundabouts.
33	5/12/2019	Thank you again for developing this plan! I agree with most of the comments already submitted by Bike Walk Montana but wanted to mention a few additional items.	
	Kip Smith	 In the Executive Summary (page XII) and on page 17 there are references to bike/pedestrian accidents with alcohol or drug impairment. However, it is not clear whether it is the cyclist, pedestrian or motorist who was impaired and clarification would be greatly appreciated. A related question is the source of this data? 	Stated on page 17: "In approximately 25 percent of the severe injury pedestrian-related crashes, the pedestrian was under the influence of alcohol or drugs. Conversely, approximately two percent of bicyclists were under the influence in severe injury bicycle related crashes." Source is MDT crash data as referenced on page 17.
		 Page 24 makes a statement about estimated costs to repair the 200+ miles for shared use trails in the MDT Right of Way as well as the annual costs to maintain these trails. However, it is not clear where these numbers come from and they appear quite low based on other data available including Rails to Trails of NW Montana data from 2015 which estimated at least \$2000/mile if volunteer help is utilized. 	Shared Use Path data is referenced from the MDT Shared Use Paths Inventory and Detailed Maintenance Plan (reference 20).
		 On a related issue, the Plan should include a strategy to developing an easy (minimal strings attached) process for volunteers to adopt portions of shared use trails within the MDT ROW for maintenance purposes (mowing, sweeping, plowing, etc). MDT or other government entities would need to remain responsible for weed control and trail resurfacing/preservation. 	Strategy 3B has an action item which reads: "Pursue crowd-sourced programs to provide some services such as "adopt a trail" programs."



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		 Table 2 on Page 26 references Montana's annual apportionment of FAST Act funds at \$6.3M for 2012-2020 but page 25 references an average TA funding available for 2013-2019 of only \$4.5M. Why the difference? The last paragraph on page 32 for Section 5.1 Standards and Resources, states that while "there are not widely accepted standards of maintenance, jurisdictions generally have clearly defined roles and responsibilities for facility maintenance." Based on my experience in the Flathead Valley, the underlined statement above is just not true. There is considerable confusion and, in some cases, downright denial of responsibility by MDT, Flathead County and the City of Kalispell for trail maintenance despite reference to written agreements between MDT and other government bodies. A lack of resources is not an excuse for failing to acknowledge responsibility to maintain these critical non-motorized transportation resources. Was the Montana Highway Patrol or other law enforcement agencies involved in developing any of the Plan sections on laws and regulations? If not, I strongly suggest MHP and law enforcement be consulted during implementation of strategies in these area to obtain their insight and buy in. Finally, I believe there should be a strategy included for MDT to request annual state funding for maintenance of share use paths within the MDT ROW. With an annual budget in excess of \$700M, it seems like including \$1M for maintenance (as documented on page 24) of non-motorized transportation infrastructure is a drop in the bucket. Again, thank you for allowing me to submit these additional comments and I look forward to working with MDT, Bike Walk Montana and other interested parties to implement Montana's Pedestrian and Bike Plan. 	As stated on page 26: "Note that the table shows approximate annual apportionment levels; actual obligation (spending) levels differ due to federal obligation limitations." Additionally, MDT chooses to dedicate federal funding to both the TA and RTP programs. It is well understood that although there are written agreements outlining maintenance responsibilities, some confusion does exist. Strategies, like 3A and 5E, were developed to help address these concerns. Law enforcement agencies were invited to the open house workshops as stakeholders and gave input there. Included in strategy 3B: "Review annual budgets and explore mechanisms for creating dedicated annual funding for various types of maintenance."