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Keeping Frenchtown, LLC
425 East Spruce Street
Missoula, MT 59802-4603

Re: Town Pump Site Development in Frenchtown, Montana | Traffic Impact Study Comparison Summary

To Whom it May Concern:

This letter provides a concise summary and comparison of two traffic impact studies evaluating the proposed Town Pump development in Frenchtown, Montana – a convenience store with 16 fueling stations (accommodating 21 vehicle positions) along with a 2,200 square foot casino. The studies are:

- Study 1 | *Frenchtown Traffic Analysis & Site Accessibility Study* prepared by Sanderson Stewart (Sanbell) for Town Pump, Inc., dated October 20, 2025.
- Study 2 | *Traffic Impact Study - Town Pump Site Development* prepared by E5 Engineering, PLLC for Keeping Frenchtown LLC, dated February 2026.

Study 1 represents the developer's perspective, focusing on site access and minimal impacts. Study 2, prepared for a community group, offers a broader, more critical assessment, highlighting potential adverse effects and extensive mitigations. Both studies use standard methodologies like the *Highway Capacity Manual* (HCM) and Institute of Transportation Engineers (ITE) guidelines, but differ in scope, assumptions, and conclusions.

Similarities

Both studies analyze the project's traffic impacts along Frenchtown Frontage Road (S-574) near Demer Street, incorporating baseline traffic counts adjusted with Montana Department of Transportation (MDT) seasonal adjustment factors. Key common elements include:

- Trip Generation Basis: Each study relies on ITE's *Trip Generation Manual* for a convenience store/gas station (Land Use Code 945), estimating high pass-by rates (75%).
- Analysis Tools: Use HCM-based software (Vistro in Study 1; Highway Capacity Software in Study 2) for level of service (LOS), queues, and delays.
- Safety Evaluation: Each study applies *Highway Safety Manual* (HSM) methods, finding no major crash trends at key intersections.
- Existing Conditions: Each study reports acceptable LOS (A-C) at Frenchtown Frontage Road & Demer Street under current volumes.
- General Recommendations: Each study suggests compliance with MDT and local standards, including potential turn lanes and traffic control upgrades where warranted.

Key Discrepancies

The studies diverge significantly in scope, data handling, projections, findings, and recommendations, potentially due to different client perspectives and updated data/methods in Study 2.

Scope and Study Area

- Study 1: Narrow focus on two intersections (Frenchtown Frontage Road & Demer Street; & Belker Lane) and site accesses plus a development horizon (buildout and occupancy year) of 2026.
- Study 2: Broader scope, including additional intersections (e.g., Beckwith Street & Ducharme; Demer Street & I-90 ramps east/west). The included development horizon was through the year 2028.

This difference aligns with ITE recommendations for study areas based on trip thresholds (e.g., 50+ peak-hour trips added), where Study 2 captures farther-reaching impacts near I-90.

Data and Methodologies

Trip Generation

- Study 1 (ITE 11th Edition): Estimates 8,115 gross weekday trips (5,446 pass-by, 2,669 net new). Peak hours: AM 701 gross (203 net new), PM 606 gross (182 net new).
- Study 2 (ITE 12th Edition): Lower gross estimate of 3,090 weekday trips (1,640 pass-by, 1,450 net new). Peak hours: AM 236 (180 pass-by), School PM 198 (148 pass-by), PM 256 (192 pass-by). Includes a school PM peak to account for local traffic patterns.

Pass-By Trip Handling

- Study 1: Calculates pass-by trips but excludes them from intersection turning movement forecasts and capacity analyses, underestimating site-specific impacts.
- Study 2: Fully incorporates pass-by trips into traffic assignments, showing higher volumes at accesses and ramps.

Growth Projections

- Study 1: Uniform 2% annual growth rate based on nearby I-90 data, for 2026 projections.
- Study 2: Variable average annual growth rates (AAGRs) by roadway (0.4%–9.1%), derived from historical MDT AADTs (pre- and post-2020), for 2028 projections. This leads to higher forecasted background volumes, especially on I-90 ramps.

Findings

Existing and Future Operations

- Study 1: Optimistic — projects acceptable LOS (A-D) at study intersections in 2026, with minimal queuing and no significant impacts from the project.
- Study 2: Identifies substandard LOS (D-F) at multiple intersections under 2026 conditions (e.g., LOS F at Beckwith & Ducharme during AM peaks due to school queues). Projects further declines to LOS E/F by 2028 with project traffic, including excessive delays and queues impacting emergency access (e.g., fire department).

Safety and Other Impacts

- Study 1: Minimal project influence on crashes; no major concerns.
- Study 2: Notes potential increased safety impacts without mitigations; emphasizes community impacts like blocked alleys, rail crossings, and lack of pedestrian facilities.

Recommendations

- Study 1: Minimal interventions – e.g., reduced speed limits (35-40 mph), multi-way stops or signals if warranted, and auxiliary turn lanes at Demer Street. Concludes no significant safety or operational impacts.
- Study 2: Extensive mitigations to address deficiencies:
 - Redirect 70% school traffic or install all-way stop control (AWSC) plus turn lanes at Beckwith & Ducharme.
 - Installation of AWSC at the Frenchtown Frontage Road and Demer Street intersection for mitigation of background traffic growth conditions in the area.
 - Roundabouts at Beckwith & Demer, Demer & I-90 ramps (east/west), and Frenchtown Frontage Road & Demer for improved LOS and safety.
 - Relocate eastern proposed Town Pump site access to align with Demer Street.

Implications and Conclusion

Study 1 portrays the project as integrating seamlessly with existing infrastructure, while Study 2 highlights risks to traffic flow, safety, and community access, potentially requiring substantial investments. These discrepancies may influence permitting decisions by MDT or Missoula County.

Please contact me if you need further details, appendices, or assistance in preparing formal correspondence.

Sincerely,



Tom Eastwood, PE, PTOE
Owner