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September 30, 2008

Mr. Tom Rogers
Planner
Gallatin County Planning Department
311 West Main, Room 208
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Subject: Storey Gravel Pit Traffic Impact Study (TIS) Review
Gallatin County, Montana

Dear Tom:

This letter has been prepared to document Camp Dresser & McKee's (CDM) review of the submitted Traffic Impact Study (TIS) for the Storey Gravel Pit. The submitted TIS is dated July 2008. The location of the proposed gravel pit is in Gallatin County, and is generally located south of Norris Road (MT 84) and approximately 0.5 miles west of River Road.

We feel that the TIS has been completed in accordance with general traffic engineering methodologies and principles. We can find no flaws in the trip generation, distribution, assignment and/or technical analysis of the material. We do want to point out a few items of interest, however, that the County may want to consider as the proposal is being contemplated through the approval process:

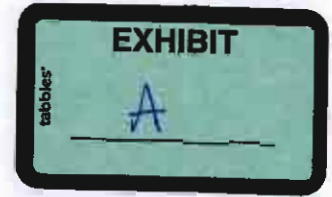
Compliance with Gallatin County Traffic Impact Study Requirements (dated May 5, 2008)

In reviewing the TIS against the Gallatin County Traffic Impact Study Requirements (dated May 5, 2008), we offer the following comments:

Item 2 - Scope of Work:

The "study time frame" observed in the report was for the existing year (year 2008), plus for the gravel pit life span as specified in the MDEQ permit (i.e. year 2028). The County's TIS requirements imply that the TIS needs to assess operations at 5-year forecasts as well. In this case, the required forecasts would be 2013, 2018 and 2023.

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Item 3 - Minimum TIS Requirements:

Trip generation forecast - note that the preparer of the TIS correctly acknowledges that the Institute of Transportation Engineers (ITE) Trip Generation Manual "...does not provide trip generation data for a quarry, gravel pit, or other similar land use" (page 6 TIS). As such, the preparer generates trip generation rates from similar gravel pits for average daily traffic, AM peak hour trips, and PM peak hour trips. We find no flaws with the derivation of the trip generation rates used in the TIS. It is worth noting that the TIS also discusses a trip generation associated with the employees that will work at the gravel pit, however it appears that these trips are embedded in the overall gravel pit trip generation values. A point of clarification from the author of the TIS may be necessary to confirm this.

Clarification?

Existing conditions - it is unclear whether there are any "recently approved but not-yet built" developments that exist in the County that may have an impact to the presented analysis. The County TIS Requirements specifically state that for the "Existing Conditions" analysis that existing conditions include "...development that has been approved but not yet built, as identified by the Planning Department". In theory, any such subdivision that meets that requirement and utilizes Norris Road should be recognized and traffic volumes along Norris Road adjusted accordingly for the TIS operational analysis. In practicality, however, the author of the TIS did address this through the use of an ambient background growth rate of 1.7 percent to account for future local and regional growth that may impact Norris Road (page 11 TIS). This is a customary and acceptable method to account for future growth along a transportation facility in absence of detailed information on other approved and/or pending developments in the area.

Weight of loaded trucks - the County TIS Requirements implies for mining and/or related processing operations, that the "weight of loaded trucks" be considered within the TIS. This is absent in this TIS. However since the main access point is onto Norris Road, a rural principal arterial, we don't believe the extra loading associated with this type of minimal vehicle usage will have a direct impact on the adjacent facility. This would be different if the gravel pit was located in the middle of a rural area away from the main roads.

Analysis of access road conditions - again, although this statement seems to be a requirement in the County's TIS requirements, we do not believe the "access road condition analysis" is necessary for this proposal based on the proximity to Norris Road and there only being one proposed access point to this rural principal arterial.



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Conclusion

As specified earlier, we'd like to reiterate that the TIS has been completed in compliance with standard traffic engineering methodologies and principles. Depending on the status of the overall project, an addendum to the TIS may be warranted. There does appear to be a few items in the County's Traffic Impact Study Requirements (dated May 5, 2008) that have not been addressed. This predominately has to do with completing the traffic operational assessment for interim five-year forecasts (2013, 2018 and 2023).

Please let us know if you have any questions regarding the review of this Traffic Impact Study.

Yours Truly,

A handwritten signature in black ink that reads "Jeffrey A. Key".

Jeffrey A. Key, P.E.
Senior Project Manager

cc: file