

DEPARTMENT OF TRANSPORTATION500 South Main Street
BISHOP, CA 93514

March 4, 1994

California Highway Patrol
Hazardous Material Section
P.O. Box 942898
Sacramento, CA 94298-0001

Attn: Routing and Prenotification Unit

NOTICE OF PROPOSED REGULATORY ACTION
Designation of Routes for the through Transportation of Highway Route
Controlled Quantity Shipments of Radioactive Materials (HMS-94-01)

Thank you for the opportunity to review and comment on the proposed designation of routes. We neither support nor oppose the proposal of any Interstate route or State highway, however, we do have these comments or questions to offer:

- Only Interstate routes are currently being proposed. Is this because only the existing controlled quantity shipments of Radioactive Materials (RAM) are being considered ~~and not~~ the potential for future shipments should Yucca Mountain ^{be considered} designated as a repository?
- Congress has promised the utility companies that they will provide for the reposit of high level nuclear waste by 1998. There is ~~an extreme~~ ^{such time} possibility that Yucca Mountain will be designated as an interim site until ~~such time~~ the site assessment studies are completed. We are concerned that State Route 127 (as being the most direct route and identified by Nevada Department of Transportation as one of the most likely preferred routes) will be designated without adequate consideration to assessing the potential impacts, the route's geometric/structural adequacy, its vertical and horizontal alignment, the availability of emergency and medical response, current accident situations, etc. These studies should be occurring now since environmental, programming and funding requirements take 5 to 10 years to complete once improvement projects have been identified. What is the California Highway Patrol position in accessing, mitigating and monitoring potential impacts to the State Highway System? As a responsible agency, Caltrans requires the developer to perform traffic impact studies. We have been told by Department of Energy that in designating routes, the States are certifying to their adequacy. We certainly hope that the CHP would not designate State routes without assuring their physical adequacy and that the potential impacts are mitigated by the contributor/developer.
- We would like to be consulted and involved at the District level should any route within our boundary be considered for future designation. We encourage the California Highway Patrol to involve us early in the process and we would welcome the opportunity to have you join us for some on-site reviews.
- There are a couple of other federal actions that are currently being considered that may impact the designation of "through" routes in California. ~~One being the California Desert Protection Act (SB21) will establish approximately 80 wilderness areas will be established in Inyo, Kern, San Bernardino, Riverside, and Imperial counties, and as you know, this bill may impact access to roadways adjoining wilderness areas. Another action is the Fort Irwin expansion. This has a potential to conflict/impact Interstate routes and State highways in San Bernardino and Inyo counties. These potential actions should be considered and their impacts, conflicts, mitigations and conditions need to be dovetailed into the process for selecting these routes.~~