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November 29, 1995

File: Inyo-127-49.42  
SCH: 95084004

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**NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT  
FOR A GEOLOGIC REPOSITORY FOR THE DISPOSAL OF SPENT NUCLEAR  
FUEL AND HIGH-LEVEL RADIOACTIVE WASTE AT YUCCA MOUNTAIN,  
NYE COUNTY, NEVADA**

The California Department of Transportation (CALTRANS), District 9, is the responsible agency for the State Transportation System in Inyo and Mono Counties. We had commented on October 5, 1995 that we may offer additional comments by the December 5 deadline date. We are now submitting additional comments to be considered in the preparation of the proposed EIS as follows:

- Potential impacts to the transportation system, most generally referred to as a Traffic Impact Analysis, should be developed as part of the EIS and each scenario, i.e., heavy haul, rail, intermodal, truck only, etc. analyzed. Modal splits and transfers should be addressed. Traffic Impact Analyses include assessment of existing conditions, physical and geometric constraints, identification of potential impacts, resulting Levels of Service, capacity analysis, environmental, economic, cultural, and social impacts are discussed, effects on tourism addressed, cumulative impacts analyzed, mitigation proposed and monitoring programs specified.
- Who will pay for transportation related improvements, mitigation and monitoring programs?
- Impact assessments should be route-specific. Designate specific routes or develop alternate routes for rail and highway. Identify statutory authority for routing and responsibilities of the various levels of government. How will interstate coordination in route selection be achieved? If new methods for route selection are considered involve responsible and appropriate agencies or levels of government in a coordinated process.
- What will be the design and operational characteristics of heavy haul trucks? Will escorts be necessary? What will be the permitting process, if not expected to be regulated by State processes? What are the general problems related in hauling the 125 ton MPC and the specific issues in moving a MPC by rail or heavy haul road?
- There should be significant state and local coordination in routing decisions. State DOTs and Regional Transportation Planning Agencies should be consulted, and their Plans should be considered and referenced.
- If non-interstate highway routes are considered then infrastructure and adequacy of these facilities need to be addressed.
- What will be the radiation doses to the motoring public en route? What are the emergency response plans and how will the plans be implemented? Who protects the

public and guarantees safe transportation? When will training and equipment for first responders be implemented?

- What is the possibility and resulting impacts of waste being retrieved and transported again at some future date?

We appreciate the opportunity to comment on the preparation of the EIS for the proposed repository at Yucca Mountain. If you have any questions regarding any of our comments please give me a call at (619) 872-0691 or Dennis Manning at (619) 872-0658.

Sincerely,

F. KATY WALTON, Chief  
Transportation Planning & Public Transportation

cc: SCH: Dana Lidster