

*Yucca  
Mtn/  
SR127*

# Memorandum

*Flex your power!  
Be energy efficient!*

To: SRIKANTH BALASUBRAMANIAN  
Project Manager

Date: April 22, 2002

File: 09-30520

From: BRAD METTAM  
DEPARTMENT OF TRANSPORTATION  
DISTRICT 9

*Katy  
FS,  
Brad*

Subject: Comments on Draft Feasibility Study Report on Potential Improvements to SR127

Thank you for the opportunity to review this draft report. I will try to capture both the comments given by Planning at the meeting on April 8<sup>th</sup>, and those noted in our review of the document.

## GENERAL COMMENTS

1. Given that the original due date for this report was last December, we are concerned that it is not more complete. Several sections have the text indicating what should be entered in that portion, while others apparently have information from prior reports. The document is neither well written nor well organized.
2. Comment #1 leads to the next issue, completion date. During the discussion at the April 8<sup>th</sup> meeting, it was implied that, if pressed for completion in the near future (60 days or less), the product would likely not be complete or very useful. If the document is not going to be delivered in a final, useful form by the end of this fiscal year, then the Project Manager and the project sponsor (D9 Planning) need to get together to resolve this.

## SPECIFIC COMMENTS

1. Page 1, paragraph 3: We recommend this be reworded to read "As the anticipated improvements may be required for safe operation of this route, if used for the transportation of high-level radioactive waste, it is anticipated that these improvements would be funded through the U.S. Department of Energy."
2. Page 1, paragraph 4: The total cost, including support components, should be described here.
3. Page 1, paragraph 5: The description of where east and west SR178 intersect with SR127 needs to be corrected.

Balasubramanian

April 22, 2002

Page 2

4. Page 1, paragraph 6: The second sentence appears to connect the fact that SR127 is a part of the National System with the fact that it is not designated as a Scenic Highway. This would be better said as follows: "SR 127 is part of the National Highway System, and is eligible to be designated as a state scenic highway, although it has not been designated as such."
5. Page 2, partial paragraph at top: The reference to AB 866(b) is unfamiliar. The correct reference should probably be to the STAA. Suggested wording for this sentence is: "SR 127 is not included in the Subsystem of Highways for the movement of Extra-Legal Permit Loads (SHELL). Neither does the Surface Transportation Assistance Act (STAA) or the Federal Highway Administration designate it as a route suitable for larger trucks." I am assuming that the author of this report will verify this information.
6. Page 2, paragraph 1: This paragraph describes the physical condition of the roadway. It should be revised to take into account available core analyses. It could benefit from revisions for readability. Also, references to Inyo or San Bernardino Counties should be spelled out, with "County" capitalized. The first use of LOS should be written: "Level of Service (LOS)". The reference to bicycle travel and available facilities in Inyo County should have a similar discussion for San Bernardino County.
7. Page 2, paragraph 2: This paragraph describes the potential for flash floods along the route. This section should include information on the four 48" high water posts listed in the postmile log as being at postmiles 22.672, 23.190, 29.321, and 31.448. Additional information on flooding locations contained in my email to you on April 17, 2002 should be researched and included in this document as appropriate. In the comment that flooding causes damage resulting in road closures "for sustained periods once every two years", the word "sustained" should be better quantified.
8. Page 2, paragraphs 4 & 5: The "Need and Purpose" statement for this document requires significant revision and expansion to be complete. We suggest wording similar to the following: "The potential use of SR 127 for the shipment of high-level radioactive wastes to Yucca Mountain may involve heavy-haul shipments of rail casks. Whatever cask options are used, this shipping campaign will continue for a quarter of a century. Should SR 127 be used for these shipments, operational improvements will be necessary on SR 127 due to a potentially significant increase in hazardous materials truck traffic and the need to provide a safe, reliable route with a minimum of closures.

Balasubramanian

April 22, 2002

Page 3

“State Route 127 is a Class 2 highway mostly constructed on the original dirt road without changes to alignment and without upgrading roadbed. While sufficient for the current limited truck and recreational travel load, it does not meet current design standards. It is subject to large scale sheet wash with numerous at grade wash crossings. There are also several crossings of the Amargosa River which are currently designed to pass flood waters over the highway. This study will identify all improvements necessary to bring this highway up to interstate standards (design, not capacity) prior to the highway being used as a truck route for route-controlled quantities of hazardous materials.”

9. Page 3, charts: Due to the nature of the material that may be transported, we recommend that the design speeds for curves along this route be made as high as possible. References to Posted Speeds should be revised to indicate that these are advisory postings. Also, the 25 mph curve at Death Valley Junction, which was identified during the field review due to its geometrics and the proximity of structures, was not considered.
10. Page 4, final portion of Need and Purpose Section: This portion of the document is poorly structured and in need of revision. The first #1 and #2, as one example, describe the need for rehabilitation due to truck weight, but do not tie this to available structural section information. Number 3 should refer to extreme weather conditions *and* flash floods, and should also refer to *pavement* breakdown. The second #2, which refers to the narrow shoulders, should also note that the horizontal curves result in tracking in the shoulders, causing them to breakdown.

The paragraph that begins “Relocation of certain sections...” should tie this improvement to the proposed truck use, emergency response needs, reliability, security, and terrorist attack vulnerability. Please note that the realignments shown in the charts on page 3 do not match known flood points.

11. Page 4, paragraph on Traffic Data: The fourth sentence in this paragraph should refer to the accident rate as *higher* than the statewide average.
12. Page 5, paragraph 5: Again the accident rate should be referred to as *higher* than the statewide average. Also, although the Baker Blvd. intersection is shown as having an F+I accident rate seven times higher than the statewide average, and although the field review identified a potential realignment to

move SR 127 out of Baker and avoid both the accident potential and the exposure to the civilian population, this realignment is never discussed.

13. Pages 4-6, Traffic Data Section: This section is divided into Inyo and San Bernardino County sections, but these sections are not clearly marked or identified.
14. Page 6, Regional and System Planning: None of the information in this section pertains to this route. Please request the needed information from District 9 Planning.
15. Page 6, Traffic Volume and LOS: None of the textual information in this section pertains to this route. Please request needed information from District 9 Planning. The tabular data, split into Inyo and San Bernardino sections, is not comparable because it is forecasted for different time periods. Please request needed information from District 9 Planning.
16. Page 8, Section 5, Alternatives: No alternatives are listed, although reference is made to alternatives in later sections.
17. Page 8, Section 6, Analysis of Proposal: This section refers to the alternatives that do not exist in Section 5. The last sentence in this section should read: "District 9's Concept Level of Service for this route is LOS C." There also needs to be consideration given to the effects on the LOS of escorted, heavy-haul vehicles on this roadway, as well as consideration of the impact of the projected increase in the percentage of trucks.
18. Page 9, System Planning: This section has no data. Also, from this point on the numbering of sections becomes erratic. Is this section a duplication of the section on page 6?
19. Page 9, Environmental Clearance: This section has no data. It is difficult to understand how costs could be estimated without this information.
20. Page 10, Funding/Scheduling: This section has no data. Refer to the information provided in Specific Comment #1, above.

We look forward to reviewing another draft of this document in the very near future. The pace of the selection of a site for the only United States repository for high-level radioactive waste is accelerating. Therefore, the need for a well-reasoned, defensible estimate of the costs involved, should State Route 127 be selected as a

Balasubramanian

April 22, 2002

Page 5

route to Yucca Mountain, becomes ever more important. We remain committed to assisting in the production of a quality Feasibility Study Report for this project.



BRAD R. METTAM

Chief, Office of Regional Planning

c: Katy Walton, D9 Deputy District Director, Planning & Programming  
Tom Hallenbeck, D9 District Director  
Kim Anderson, Chief, Central Region Project Development

BRM/brm