

**DEPARTMENT OF TRANSPORTATION**500 South Main Street  
BISHOP, CA 93514

March 11, 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. Caltrans neither supports nor opposes the proposal of any Interstate route or State highway. We do have these comments, suggestions, 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? Future shipments should be considered, such as, the potential shipments to Yucca Mountain if it is 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 a strong possibility that Yucca Mountain will be designated as an interim repository until 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's 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 the 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 to 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. Please involve us early in the process, and we welcome the opportunity to have you join us for some on-site reviews.
- There are a couple of federal actions that are being considered that may impact the designation of "through" routes in California. The California Desert Protection Act (SB21) will establish approximately 80 wilderness areas in Inyo, Kern, San Bernardino, Riverside, and Imperial counties, and may impact access to roadways adjoining these wilderness areas. Another proposed action is the Fort Irwin expansion which has a potential to 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 routes.

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Again, we stress our neutrality on which State routes are designated. We are encouraged that the CHP is "contemplating additional routing considerations such as physical constraints of roadways, inadequate shoulders, turning radius . . ." We would like to be reassured that these factors are given top priority, and that if the infrastructure is not adequate before designation then the improvements or impacts need to be clearly identified and how they will be implemented or mitigated, financed, and monitored.

Please give Mr. Ken Deboy, Deputy District Director of Planning and Project Development, a call if you would like to discuss any of these comments or if we can be of any assistance in your studies. You can reach him at (619) 872-0604.

Sincerely,

*K. M. Deboy for*

LEWIS K. WOOD  
District Director  
of Transportation

cc: Ken Deboy, DDDP&PD



Attention: CALIFORNIA HIGHWAY PATROL HAZARDOUS MATERIAL SECTION ATTN: ROUTING & PRENOTIFICATION		From: <b>DISTRICT 09</b> 500 S. Main Street BISHOP, CA 93514	
Unit / Company		Name of Sender KEN DEBOY	
		Date 3/11/94	Total Pages (including cover sheet) 3
		FAX # (& area code) (619) 872-0678	ATSS FAX 8-627-0678
District / City SACRAMENTO		Phone # (& area code) (619) 872-0604	ATSS 8-627-0604
Phone # (& area code) (916) 327-3310	FAX # (& area code) (916) 446-4870	ORIGINAL DISPOSITION <input type="checkbox"/> Destroy <input checked="" type="checkbox"/> Return <input type="checkbox"/> Call for Pick-up	

Comment:

TRANSMIT CONFIRMATION REPORT

NO. : 002  
RECEIVER : CHPSACESD/HMS  
TRANSMITTER : CALTRANS DISTRICT 9  
DATE : MAR 11 '94 15:02  
DURATION : 01'59  
MODE : STD  
PAGES : 03  
RESULT : OK



Attention: <i>BRAD METTAM</i>		From: <b>DISTRICT 09</b> 500 S. Main Street BISHOP, CA 93514	
Unit / Company <i>INYO COUNTY-YUCCA MT.</i>		Name of Sender <i>Katy Walker</i>	
		Date <i>3/11/94</i>	Total Pages (including cover sheet) <i>3</i>
		FAX # (& area code) (619) 872-0678	ATSS FAX 8-627-0678
District / City <i>INDEPENDENCE</i>		Phone # (& area code) <i>(619) 872-0691</i>	ATSS
Phone # (& area code) <i>(619) 878-0380</i>	FAX # (& area code) <i>878-0382</i>	ORIGINAL DISPOSITION <input type="checkbox"/> Destroy <input checked="" type="checkbox"/> Return <input type="checkbox"/> Call for Pick-up	
Comment: <i>these were our comments on the NPRA for designated routes to CHP.</i>			

TRANSMIT CONFIRMATION REPORT

NO. : 003  
RECEIVER : INYO COUNTY, CALIF  
TRANSMITTER : CALTRANS DISTRICT 9  
DATE : MAR 11'94 15:05  
DURATION : 01'50  
MODE : STD  
PAGES : 03  
RESULT : OK