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MR. WHITAKER: Good afternoon. I'm John

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Whitaker. I'm the division head for the Roadway System

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Division of the Nevada Department of Transportation.

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I'd like to thank you for the opportunity to

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speak these comments as well as submit them in a general

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written form. Thank you for that.

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With that said, I'm here to represent my

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department's disfavor with the analysis that is relative

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to the shipping modes and impacts that are associated with

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those. They basically revolve around three issues, and

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I'll be very general on those three issues.

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You will find our specific concerns about

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program issues, locations on highways, activities, those

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things within the comments that will be submitted by

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Mr. Loux's office. These three areas of contention are

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model data, and specifically I mean the data that was

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driven by the HIGHWAY and RADTRAN models and also the one

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for the routing for the rail also, I believe it's called

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rail.

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Secondly, we have concerns about the

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infrastructure impacts that would be brought about by

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heavy-haul.

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And thirdly, we have operational issues that

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would come about from trying to have a heavy-haul shipping

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campaign in our state.

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First the model, I'm not here to basically

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scold DOE or anything like that. But shame on you for

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using 1990 census data to input into the risk model and

1 cont. 18 the routing models, specifically I mean HIGHWAY and
19 RADTRAN. There are available 1998 data that have been
20 certified by our Governor's office that in fact other
21 federal agencies do use that would have been far more
22 telling in these analysis.

23 And the reason I state this is because the
24 population in Clark County in 1990 was 779,000. Today it
25 is in July of 1998, it's 1.2 million.

1 And I know for a fact the buffer corridor
2 that runs along the beltway in 1990 practically had no one
3 living next to it. That's what we all know as Summerlin
4 today. If you look at Summerlin today, there are
5 literally thousands of people living in that corridor.

6 We would like these models rerun with these
7 appropriate parameters inputted.

2... 8 As far as the infrastructure impacts are
9 concerned, we found no inventory of locations that need
10 remedial activity within the DEIS. There were no
11 calculations to determine these costs. No comparisons of
12 the benefit costs for rail as opposed to heavy-haul. And
13 pretty much that the verbiage around heavy-haul assumes
14 that this is something that our highway system now can
15 sustain.

16 There's been a plethora of media coverage
17 about the autoclave deliveries that we have had and these
18 vehicle configurations to haul these amounts into our
19 state. There's been an assumption that our heavy-haul
20 casks, heavy-haul operations would be somewhat like that.

21 And the public should really realize that we

2 cont.

22 only really permit about one of those vehicles a year and
23 that we're looking at something on the neighborhood of two
24 loaded vehicles a day going into the site and then two
25 unloaded vehicles that are only 200,000 pounds of less
1 weight going out of the site back to the intermodal
2 facility. It's not a campaign that is run smoothly or
3 efficiently, I guess is the word I can use.

4 Lastly, as far as the operations
5 considerations of heavy-haul, we found absolutely no
6 estimate of what traffic queues would be accumulated
7 behind these convoys.

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8 There was very little about sabotage. We
9 found in fact that the sabotage, the only thing that
10 really related to it was in terms of what could happen at
11 the waste handling building, and it really didn't relate
12 to anything outside in the rural areas in canyons or any
13 of the choke points that occur along these routes.

14 Lastly, we're finding numerical differences
15 basically in looking at turning radii for operating
16 heavy-haul vehicles on our system as it is now. There are
17 certain summits and curves on routes that are listed that
18 we don't think even a double articulated multi-tractored
19 vehicle can actually traverse and legally stay within its
20 loads.

21 With that I would like to end my comments by
22 saying that we're not here to really say pro or con on the
23 whole project, but we are adamantly against any heavy-haul
24 option. Thank you very much.