

**From:** [Niclas, Jan, NMDOT](#)  
**To:** [Waldron, Ashley](#)  
**Cc:** [Maynard, Larry G., NMDOT](#); [Grover, Jayson, NMDOT](#); [Kazmi, Arif, NMDOT](#); [Gallegos, Andrew, NMDOT](#)  
**Subject:** [External\_Sender] Nuclear Regulatory Commission's EIS review request for information  
**Date:** Tuesday, June 04, 2019 11:06:53 AM  
**Attachments:** [image001.png](#)  
[IDC\\_NRC\\_2019-06-01.doc](#)

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Good morning Ashley

Attached is NMDOT District 6 response to your questions concerning haul equipment crossing NM 566. Please contact me at your earliest convenience if you have any questions or comments.

Have a great day!

*Jan*

Image result for NMDOT logo



**Jan L Niclas, P.E.**

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## Intra-Departmental Correspondence

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**DATE:** June 3, 2019

**TO:** Larry Maynard, PE  
District Engineer

**FROM:** Jan Niclas, PE  
Assistant District Engineer

**SUBJECT:** United Nuclear Corporation's proposal to move mine waste across NM 566

Dear Mr. Maynard

Please see response to letter received from Ms. Ashley Waldron, NRC.

- *Does NMDOT have any specific or general concerns regarding analysis of potential environmental impacts from the proposed transportation of mine waste from the NECR mine site to the UNC Mil Site including the proposal to establish traffic controls on State Route 566 to allow crossings of NECR mine waste haul trucks?*
  - NMDOT is concerned of the weight limits of trucks crossing NM 566. The roadway exhibits distress in the form of cracks and rutting. What mitigation measures does NECR propose?
  - NECR must submit proposed traffic control plans to control the crossing.
  - What would be the duration of crossing, with beginning and end dates?
  - NECR must follow 18.31.6 NMAC, State Highway Access Management Requirements for crossing geometry, materials in order to obtain permit. Contact District 6 Traffic Engineer, Jayson Grover, PE, at 505-290-8340 for specific requirements and submission.
- *Does NMDOT have any specific safety concerns with existing local road transportation?*

- NM 566 serves the communities of Church Rock, Navajo Wingate Village, Mariano Lake, Pinedale and the Red Rock State Park. The Annual Average Daily Traffic (AADT) has a volume of 5,027 vehicles of which 11% is commercial vehicles.
  - Community members have voiced their concern with delays caused by construction of a replacement bridge at MP 0.1 and the long detour route should they choose an alternative route via NM 371 at Smith Lake.
- *Are there any specific or unique attributes of local transportation conditions that the NRC staff should be aware of in developing an analysis of potential transportation impacts?*
  - Red Rock Park has numerous local events from May thru September each year. These events are scheduled each weekend and impact the volume of traffic using NM 566. The park may see events with 8,000 visitors per event during the summer months.
  - Padre Canyon Road located south of Red Rocks Park, is planned to be paved but has not been scheduled. The roadway would provide an alternative for a detour route to NM 118 during construction of the bridge at MP 0.1.
  - Coordination with McKinley County Schools will be required to coordinate pickup and drop-off times of students and activities along the route.
- *Does NMDOT have any insights into how the frequent closure of State Route 566 to accommodate proposed truck crossings would affect local transportation in the vicinity of the Church Rock sites?*
  - Frequent closure of NM 566 is not an option with the community members and long detour routes do not provide many options.
- *Are there any issues or challenges regarding the local transportation (road) infrastructure that the NRC should be aware of such as (1) aging infrastructure, (2) funding, (3) traffic, (4) routing, (5) extreme weather events such as flooding affecting local roads.*
  - There are two (2) bridges located on NM 566. The first bridge is located at milepost (MP) 0.1, crossing over the BNSF railroad. The bridge has reduced capacity and is currently in design for a replacement structure, providing additional capacity for BNSF to add a third mainline track in the future if it fits their mission.
  - The second bridge is located between MP 6.0 and MP 7.0. The bridge has low clearance above an arroyo and may experience overtopping in the design event.
  - Stake holders have voiced their concerns about traffic impacts during construction, including lane closures, delays and long detours. The detour route includes a dirt road to NM 371, with connection at Smith Lake which is not an acceptable alternative to the community.
  - Peabody Energy has constructed an overcrossing of NM 509 at milepost 21.5, to avoid impacts of off-road equipment and security with the mine. Suggest NECR review this overcrossing.

**CC: File**  
**Arif Kami, PE**  
**Jayson Grover, PE**  
**Andrew Gallegos, PE**