November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Martha Little
Name

[redacted]
City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

MARKUS HAK
Name

[redacted]
City, State, ZIP [redacted]

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Nelson Flint

Name

[redacted]

City, State, ZIP

November 11/11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Mona Smith

Name

Add[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner…." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner…." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Name

[redacted]

City, State, ZIP [redacted]

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3 Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner…." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Reuben Leber
Name

[redacted]
City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3 Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner…." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Rachelle Burnham
Name

[redacted]
Address

[redacted]
City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

ROSE BARROWS
Name

[redacted]
City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Rex T. Raymond
Name

[redacted]
City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Scott PHELPS
Name

[redacted]
City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Sam Berne
Name

[redacted]
City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner…." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Name

[redacted]

Address

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner…." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

SUSAN L. BARDES

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Therese Rolland

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Tanya Bonds

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

ERIC MARCETT

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Tiana [illegible]

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Name

[redacted]

City, State, ZIP

November 11, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Name

A[redacted]

City, State, ZIP

January 12, 2002

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of the Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment
Proposed Construction and Operation of a Biosafety Level 3 Facility
at Los Alamos National Laboratory DOE/EA-1364

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. There are too many unknowns and uncertainties that are not addressed in the EA. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) must prepare a full Environmental Impact Statement with the opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA propose using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis of the communities along the transportation route.

While I appreciate the 30-day extension to comment on the draft EA, it is too short for a complete review of the large EA and its supporting documents. I request a 120-day comment period on the EA.

Sincerely,

Elaine Rivalles
(name)
[redacted]
(address)
[redacted]
(city, state, zip)

November 12, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of the Environment
DOE LAAO
528 35th Street
Los Alamos, NM 87544
Via email and U.S. Mail

Dear Ms. Withers,

Some concerns have arisen due to the release of the predecisional Draft Environmental Assessment on the proposed Los Alamos National Laboratory (LANL) Biological Safety Level 3 (BSL-3) facility (DOE/EA-1364).

First, several local public advocacy groups have requested documents pertaining to public health and safety issues at the current LANL BSL-2. Though some of these requests were submitted more than 2 1/2 months ago, they remain unaddressed. Documents that were used in preparation of the BSL-3 EA must be made immediately available to the general public. The Department of Energy's (DOE) own Implementing Regulations state that "DOE shall make its NEPA [National Environmental Policy Act] documents available ... [to] interested groups, and the general public ..." (10 CFR 1021.301) Furthermore, the Council on Environmental Quality states that "No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment." (CEQ, 40 CFR 1502.21) To date, the DOE's obligations under NEPA have not been met, rendering it impossible for appropriate and educated written comment by the public. Local public advocacy groups must be adequately informed in order to educate the public who hold a vested and personal interest in the proposed LANL BSL-3 facility and the potential impact such a facility could have on their communities.

Second, local public advocacy groups, along with the general public, must have an opportunity to discuss the impact of the proposed LANL BSL-3 facility with experts outside of the community who may have a independent view of the proposal.

Third, one local public advocacy group who contributed extensive EA scoping comments on the proposed BSL-3 facility received the Draft EA on the proposed BSL-3 facility two weeks after the comment period was announced.

Finally, the length of the Draft EA makes prompt review and comment impossible.

[redacted]

[redacted]

December 13, 2001

Ms. Elizabeth Withers
Office of Environment
528 35th Street
Los Alamos, NM 87544

Dear Ms. Withers:

I am writing to request that the Los Alamos National Lab not build a facility to test biological weapons.

I am strongly opposed to the biosafety level 3 facility. Since the United States pulled out of the biological weapons treaty negotiations and has conducted offensive-type tests, I do not trust that the facility will be for defense only.

Thank you for taking my letter into consideration.

Sincerely,
Era Marie Salas

[redacted]

Therefore, the proposed 21 day comment period is inadequate. The comment period must be extended beyond 30 days. We request a review and comment period of 120 days.

Furthermore, the informal discussion currently proposed is inadequate. The CEQ states that an agency shall "Hold or sponsor public hearings or public meetings whenever appropriate or in accordance with statutory requirements applicable to the agency ... [including when there is] Substantial environmental controversy concerning the proposed action or substantial interest in holding a hearing." (CEQ 40 CFR 1506.6 (c)1) A formal public hearing must be held on the Draft EA for the LANL BSL-3. This will allow the public to ask questions and give comment for the record. We would be happy to provide assistance to you on organizing this public hearing.

A prompt response to this letter would be appreciated.

Sincerely,

Peggy Prince,
[redacted]

Cathie Sullivan
Interested Citizen
[redacted]

Colin King
[redacted]

Greg Mello
[redacted]

Matthew J. Kelly MD
[redacted]

Deborah Reade
[redacted]

Susan Dayton
[redacted]

Cc: U.S. Representative Tom Udall
Senator Jeff Bingaman
David Gurelé, LAAO
Tom Rush, LAAO
Jill Trewhella, LANL B division
Matt Ortiz
Spencer Abraham, DOE

Withers, Elizabeth

From: Tim King[SMTP:[redacted]
Sent: Sunday, January 13, 2002 7:30 PM
To: Withers, Elizabeth
Subject: comments (DOE/EA-1364)

Ms.Elizabeth Withers,
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos,NM 87544

Dear Ms.Withers,

I submit the following comments on the draft Environmental Assessment (EA)(DOE/EA-1364)for the Proposed Biological Safety Level (BSL)-3 Laboratory at LANL:

The seriousness of the issues related to the proposed LANL BSL-3 facility and demonstrated "significant public interest"require that at a minimum an environmental impact statement be prepared.This should occur within the context of broader programmatic review.

Given that the Centers for Disease Control and Prevention (CDC)must approve of procedures used in NNSA biological research activities,the DOE should designate the CDC as a "cooperating agency"in both programmatic and facility-specific NEPA reviews.

The purpose and need for LANL 's proposed BSL-3 facility must be more clearly stated in a final environmental impact statement.Additionally,"transparency measures"should be institutionalized so that the facility cannot be construed as being in support of offensive weapons.

Seismic risks must be more comprehensively analyzed for the proposed facility locations.

Hazard control plans and safety and risk analyses,which are presently inadequate or simply don 't exist,must be fully developed.

Local interagency emergency response and medical teams need to be adequately trained and kept informed of facility operations.

The Draft EA repeatedly refers to the Institutional Biosafety Committee (IBC)as an overseer of proposed facility operations and states that two members of the public sit on that committee.The IBC charter,which mandates public involvement,must be fully complied with.

Credible terrorist risk analyses have not been done. This is inexcusable in the wake of the 9.11 and anthrax attacks. A final environmental impact statement should address these all-too-real risks.

The stated plans to ship either attenuated or live biological select agents through the U.S.Postal Service is unacceptable because of potential safety and terrorist risks. A final environmental impact statement must designate other transportation options such as secure federal couriers. This is particularly important bercause there have been accidents with attenuated anthracsis shipped tyhrough the mail.

The draft EA inadequately discusses research on federally unregulated microorganisms. If such research is to be conducted,additional review under NEPA is required.To the extent possible,a final environmental impact statement should address this issue.

The National Nuclear Security Administration (NNSA),a semi-autonomous agency within the Department of Energy,has already implemented a multi-facility Chemical and Biological National Security Program,of which the proposed LANL BSL-3 will be a part.Pursuant to the National Environmental Policy Act (NEPA),the NNSA should prepare a programmatic environmental impact statement for that program,which could include a facility-specific analysis of the proposed LANL BSL-3 facility.

Respectfully submitted,
Timothy and Janice King

Timothy and Janice King
[redacted]

November 13, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364 "Proposed Construction and Operation of a Biosafety Level 3 Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Amy Williams
Name

1160 Camino Cruz Blanca
Address

Santa Fe, NM 87505
City, State, ZIP

Withers, Elizabeth

From: Ann P Ware[SMTP:[redacted]
Sent: Tuesday, November 13, 2001 10:54 AM
To: Withers, Elizabeth
Subject: biological weapons study

Dear Ms Withers,

This is an urgent plea that the proposed study on biological weapons NOT be carried out at a weapons facility but by the Center for Disease Control.

The stakes are too high to have government military personnel or facilities involved.

Sincerely,
Ann P. Ware
[redacted]

November 13, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Thank You,

Mia Buonaiuto

November 13, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Mia Buonaiuto

[redacted]

From Chris Mechels

Issues Which Should Preclude Siting The BSL-3 Lab At LANL

Worker Safety and Public Safety

The history of worker safety in the United States establishes one thing clearly; management has always opposed adequate worker safety. The only effective champion of worker safety has been the workers themselves and their unions. The most important worker safety legislation in the US has been the 1970 OSHA Act, which was passed by the unions and their congressional supporters over the objection of management. The establishment of OSHA sets up a system whereby the workers and their champion (OSHA) attempt to coerce the management to improve worker safety. Management is the problem, not the solution to the problem. The workers, and their unions, are the solution.

Public safety is best served by the workers, who are members of the public. This has been long been recognized and has led to numerous State and Federal laws which protect "whistle blowers". Hazel O'Leary made much of whistle blowers, and tried to protect them, because of their essential role. All hyperbole aside, those interested in the public safety should look first to how whistle blowers are treated.

The record of UC/LANL in undermining worker safety and whistle blowers is well know, and abysmal:

- LANL management has destroyed the whole idea of workers and their champion (OSHA) creating a safe work environment. The OSHA agency does not enforce OSHA standards at DOE facilities as this is precluded under the Atomic Energy Act. The DOE itself "enforces" OSHA standards (29CFR 1910 and 29CFR 1926) at DOE contractor facilities, as spelled out in DOE Order 440.1 and the UC/DOE contract for management of the Labs. LANL management destroyed the OSHA model by setting itself (management) up as the arbiter of worker safety and pushing aside the workers and the DOE, thus subverting the whole OSHA system. LANL management does not train their work force on OSHA standards, thus keeping them in the dark. LANL management has pushed aside DOE, to the point that "mandatory" (DOE Order 440.1) DOE annual "OSHA" inspections have not been done at LANL since 1995 when LANL ESH Division Leader Erickson told the DOE that they weren't going to do that anymore. Thus, the whole world of worker safety has been turned on its head at LANL with management (always the problem in worker safety) having driven workers and DOE to the sidelines and in command of the field.
- LANL management opposes any efforts to empower worker organizations. They opposed the modification of California law (HEERA Act) which extended to LANL employees the right to bargain collectively. Since passage of the modifications they actively oppose all efforts by LANL employees to organize and bargain collectively. This directly obstructs the most effective agency for worker/public safety, the workers and their unions.
- LANL management has opposed all efforts to bring in external regulation (OSHA and NRC) to the DOE complex. They prefer DOE's enforcement of OSHA standards, which is non enforcement. They have worked with Senator Domenici to defund the external regulation efforts of Secretary O'Leary and her successors. LANL/UC (Bob VanNess) continues to testify against recent efforts of the House Commerce Committee to explore external regulation.
- Even worse than their record with UC/LANL employees is the LANL performance with sub contractors, such as Johnson Control employees. Many accidents at LANL, including the Efren Martinez accident, have been due to LANL employees bypassing safety regulations and demanding that contractor employees perform tasks without adequate protections. Those responsible for the accidents, as in the Martinez incident, have been promoted and given large raises. If sub contractor employees object they are removed, by a simple phone call to their management. They have no rights.
- The AEC/DOE worker safety record is terrible, by consensus of everyone who has studied the issue. Even worse is the UC/LANL performance, as they have undermined even the pathetic efforts that DOE has seen fit to make. The only solution to the problems, as is well known, is to move to external oversight by OSHA and the NRC. This solution is strenuously resisted by UC/LANL management which seems to care more about their power than the worker's safety.

Public Safety is best preserved by empowering workers as they know what is going on and have an interest in protecting themselves and their families. Worker empowerment is essential to protecting the public. UC/LANL management undermines this empowerment by attacking whistle blowers;

- In a very recent case, the LANL management attacked Joe Gutierrez an auditor with the Audits and Assessments Office. When Joe found management problems during audits he was told that he should be a "team player" and hide the problems. When he continued to find problems (his job) he was subjected to adverse personnel actions. He became a whistle blower and spent years under attack by LANL management and their attorneys. Joe finally prevailed.
- In a recent LLNL case Dave Lappa refused to sign off on a "cover up" of problems at the LLNL plutonium facility. He immediately became a target of management. Dave became a whistle blower and suffered through years of court battles before he prevailed. UC management supported LLNL in these efforts, despite pleas by Lappa that they investigate the LLNL actions.
- DOE supports this attack on whistle blowers by paying the legal fees of the Labs.

Reform First!

Given the sorry, and continuing, record of LANL management in undermining worker safety and the public safety (whistle blowers) LANL should not be considered for additional hazardous facilities, such the BSL-3 facility at this time. The facility should be contingent upon reform, which involves empowering the workers and the public.

From Chris Mechels

Issues Which Should Preclude Siting The BSL-3 Lab At LANL

Worker Safety and Public Safety

The history of worker safety in the United States establishes one thing clearly; management has always opposed adequate worker safety. The only effective champion of worker safety has been the workers themselves and their unions. The most important worker safety legislation in the US has been the 1970 OSHA Act, which was passed by the unions and their congressional supporters over the objection of management. The establishment of OSHA sets up a system whereby the workers and their champion (OSHA) attempt to coerce the management to improve worker safety. Management is the problem, not the solution to the problem. The workers, and their unions, are the solution.

Public safety is best served by the workers, who are members of the public. This has been long been recognized and has led to numerous State and Federal laws which protect "whistle blowers". Hazel O'Leary made much of whistle blowers, and tried to protect them, because of their essential role. All hyperbole aside, those interested in the public safety should look first to how whistle blowers are treated.

The record of UC/LANL in undermining worker safety and whistle blowers is well know, and abysmal:

- LANL management has destroyed the whole idea of workers and their champion (OSHA) creating a safe work environment. The OSHA agency does not enforce OSHA standards at DOE facilities as this is precluded under the Atomic Energy Act. The DOE itself "enforces" OSHA standards (29CFR 1910 and 29CFR 1926) at DOE contractor facilities, as spelled out in DOE Order 440.1 and the UC/DOE contract for management of the Labs. LANL management destroyed the OSHA model by setting itself (management) up as the arbiter of worker safety and pushing aside the workers and the DOE, thus subverting the whole OSHA system. LANL management does not train their work force on OSHA standards, thus keeping them in the dark. LANL management has pushed aside DOE, to the point that "mandatory" (DOE Order 440.1) DOE annual "OSHA" inspections have not been done at LANL since 1995 when LANL ESH Division Leader Erickson told the DOE that they weren't going to do that anymore. Thus, the whole world of worker safety has been turned on its head at LANL with management (always the problem in worker safety) having driven workers and DOE to the sidelines and in command of the field.
- LANL management opposes any efforts to empower worker organizations. They opposed the modification of California law (HEERA Act) which extended to LANL employees the right to bargain collectively. Since passage of the modifications they actively oppose all efforts by LANL employees to organize and bargain collectively. This directly obstructs the most effective agency for worker/public safety, the workers and their unions.
- LANL management has opposed all efforts to bring in external regulation (OSHA and NRC) to the DOE complex. They prefer DOE's enforcement of OSHA standards, which is non enforcement. They have worked with Senator Domenici to defund the external regulation efforts of Secretary O'Leary and her successors. LANL/UC (Bob VanNess) continues to testify against recent efforts of the House Commerce Committee to explore external regulation.
- Even worse than their record with UC/LANL employees is the LANL performance with sub contractors, such as Johnson Control employees. Many accidents at LANL, including the Efren Martinez accident, have been due to LANL employees bypassing safety regulations and demanding that contractor employees perform tasks without adequate protections. Those responsible for the accidents, as in the Martinez incident, have been promoted and given large raises. If sub contractor employees object they are removed, by a simple phone call to their management. They have no rights.
- The AEC/DOE worker safety record is terrible, by consensus of everyone who has studied the issue. Even worse is the UC/LANL performance, as they have undermined even the pathetic efforts that DOE has seen fit to make. The only solution to the problems, as is well known, is to move to external oversight by OSHA and the NRC. This solution is strenuously resisted by UC/LANL management which seems to care more about their power than the worker's safety.

Public Safety is best preserved by empowering workers as they know what is going on and have an interest in protecting themselves and their families. Worker empowerment is essential to protecting the public. UC/LANL management undermines this empowerment by attacking whistle blowers;

- In a very recent case, the LANL management attacked Joe Gutierrez an auditor with the Audits and Assessments Office. When Joe found management problems during audits he was told that he should be a "team player" and hide the problems. When he continued to find problems (his job) he was subjected to adverse personnel actions. He became a whistle blower and spent years under attack by LANL management and their attorneys. Joe finally prevailed.
- In a recent LLNL case Dave Lappa refused to sign off on a "cover up" of problems at the LLNL plutonium facility. He immediately became a target of management. Dave became a whistle blower and suffered through years of court battles before he prevailed. UC management supported LLNL in these efforts, despite pleas by Lappa that they investigate the LLNL actions.
- DOE supports this attack on whistle blowers by paying the legal fees of the Labs.

Reform First!

Given the sorry, and continuing, record of LANL management in undermining worker safety and the public safety (whistle blowers) LANL should not be considered for additional hazardous facilities, such the BSL-3 facility at this time. The facility should be contingent upon reform, which involves empowering the workers and the public.

November 13, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3 Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

Michael Buonaiuto
Name

[redacted]

[redacted]

Facsimile Coversheet

To: Elizabeth Withers Fax: 505 667-9998

From: Sister Kathleen Corbett, SL Date: November 13, 2001

Re: Biochemical testing Pages 1

☑ Urgent ☐ For Review ☐ Please Comment ☐ Please Replay

Dear Elizabeth,

Because of LANL's poor record with safety inspectors and in the world's current climate, please make sure that any biochemical testing takes place at the Center for Disease Control and not at weapons centers!

Sincerely,
Sister Kathleen, SL

LOS ALAMOS COUNTY

[redacted]

COUNTY COUNCIL
Council Chairman
Geoff Rodgers
Council Vice-Chair
Frances M. Berting
Councilors
Diane Albert
Lanry Mann
Lewis Muir
Patricia (Pat) Rogers
Sharon Stover

COUNTY ADMINISTRATO
Mary M. McInerny

January 14, 2002

Elizabeth Withers
Department of Energy
Albuquerque Operations Office
Office of Los Alamos Site Operations
Los Alamos, New Mexico 87544

RE: DOE/EA-1364 on Biological Safety Level (BSL) – 3 Facility at LANL

Dear Ms. Withers:

The Los Alamos County Council supports the decision of the Department to locate a BSL-3 facility at the Los Alamos National Laboratory LANL. While some in the community see potential hazards associated with this facility, the same can be said about other activities at LANL. This facility will contribute significantly to national security and homeland security, and it should be located at LANL where it can be effective and safe.

We look forward to a Record of Decision by the Department to proceed expeditiously with this important project.

Sincerely,

Geoff Rodgers

Geoff Rodgers, Chairman
Los Alamos County Council

FB/ss

CC: County Council
Los Alamos Congressional Delegation
John Browne

Withers, Elizabeth

From: Brad Mitchell[SMTP[redacted]
Sent: Monday, January 14, 2002 9:05 AM
To: Withers, Elizabeth
Subject: biological safety level-3 laboratory (BSL-3)

Dear Ms. Withers,

Why is another Level-3 lab needed in the USA? It seems to me that there are other places where this work can be done. Shouldn't the amount of Level-3 labs be kept to a minimum?

I agree that LANL should be involved in this type of research, but couldn't the hands on work be done at an existing facility?

Sincerely,

Brad Mitchell

Withers, Elizabeth

From: Paul Luehrmann[SMTP: [redacted]
Sent: Monday, January 14, 2002 6:35 PM
To: Withers, Elizabeth
Subject: Comment Period

Dear Ms. Withers, Compliance Officer,

I would like to officially comment concerning a proposal to build at Los Alamos National Laboratory a new and more extensive laboratory to study biological agents including anthrax.

I will also send these comments via the U.S. Mail.

I am concerned about this additional laboratory. I do not view LANL's asfety record as being very good. I would have concern that any "live" biological agents could find a way out of their control areas.

I also feel strongly that a full, environmental assesment needs to be completed. It should also include an assessment of all emergency plans for each individual biological agent. And in the future if new biological agents are considered, they need to be amended into the environmental assessment and emergency procedures.

Please treat these as official comments and please keep me name and address on your mailing list.

Sincerely,

Paul Luehrmann
[redacted]

Withers, Elizabeth

From: James K. Sprinkle, Jr.[SMTP [redacted]
Sent: Monday, January 14, 2002 4:47 PM
To: Withers, Elizabeth
Subject: Biosafety lab

Hello

I fully support the Biosafety lab at Los Alamos.

I find it ridiculous that a national lab with a great safety record is being questioned about whether it can handle a lab similar in hazard to one found in almost every community in their local hospital. Of course we can. And we should.

Jim Sprinkle

****

James K.
Sprinkle
Acting Deputy Group
Leader
Los Alamos National Laboratory
PHONE: [redacted]
EMAIL: [redacted]
FAX: [redacted]
[redacted]

Foreign correspondence: TSPA

****

November 14, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87544

Re: Predecisional Draft Environmental Assessment - DOE/EA-1364
"Proposed Construction and Operation of a Biosafety Level 3
Facility at Los Alamos National Laboratory"

Dear Ms. Withers:

The predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL) will not support a finding of no significant impact. The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not complete a full analysis of the environmental and human health impacts of the proposed facility in the EA. In addition, the BSL-3 was not included in the Site-wide Environmental Impact for Continued Operation of the LANL; therefore, DOE/NNSA must prepare a full Environmental Impact Statement with opportunity for public comment and public hearing.

There are many unknowns and uncertainties in the draft EA. These include an incomplete analysis of the human health risks where DOE/NNSA proposes using LANL's past experience with BSL-1 and BSL-2 laboratories to assign risk because "information on human health effects specifically related to BSL-3 laboratories located in the United States is not tracked in any formal manner...." Other unknowns and uncertainties include where the BSL-3 waste would be disposed of, a complete seismic activity analysis, and increased transportation risk analysis for the communities along the transportation routes.

The 21-day comment period is too short for a complete review of the large EA. I request a 120-day comment period on the EA.

Sincerely,

good luck to you

Name

[redacted]

City, State, ZIP

Date 1-14-02

Ms. Elizabeth Withers,
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos, NM 87544
Fax: 505/667-9998; E-mail: ewithers@doeal.gov

Dear Ms. Withers,

I submit the following comments on the draft Environmental Assessment (EA) (DOE/EA-1364) for the Proposed Biological Safety Level (BSL)-3 Laboratory at LANL:

- The seriousness of the issues related to the proposed LANL BSL-3 facility and demonstrated "significant public interest" require that at a minimum an environmental impact statement be prepared. This should occur within the context of broader programmatic review.

- Given that the Centers for Disease Control and Prevention (CDC) must approve of procedures used in NNSA biological research activities, the DOE should designate the CDC as a "cooperating agency" in both programmatic and facility-specific NEPA reviews.

- The purpose and need for LANL's proposed BSL-3 facility must be more clearly stated in a final environmental impact statement. Additionally, "transparency measures" should be institutionalized so that the facility cannot be construed as being in support of offensive weapons.

- Seismic risks must be more comprehensively analyzed for the proposed facility locations.

- Hazard control plans and safety and risk analyses, which are presently inadequate or simply don't exist, must be fully developed.

- Local emergency response and medical teams need to be adequately trained and kept informed of facility operations.

- The Draft EA repeatedly refers to the Institutional Biosafety Committee (IBC) as an overseer of proposed facility operations and states that two members of the public sit on that committee. The IBC charter, which mandates public involvement, must be fully complied with.

- Credible terrorist risk analyses have not been done. This is inexcusable in the wake of the 9.11 and anthrax attacks. A final environmental impact statement should address these all-too-real risks.

- The stated plans to ship either attenuated or live biological select agents through the U.S. Postal Service is unacceptable because of potential safety and terrorist risks. A final environmental impact statement must designate other transportation options such as secure federal couriers.

- The draft EA inadequately discusses research on federally unregulated microorganisms. If such research is to be conducted, additional review under NEPA is required. To the extent possible, a final environmental impact statement should address this issue.

- The National Nuclear Security Administration (NNSA), a semi-autonomous agency within the Department of Energy, has already implemented a multi-facility Chemical and Biological National Security Program, of which the proposed LANL BSL-3 will be a part. Pursuant to the National Environmental Policy Act (NEPA), the NNSA should prepare a programmatic environmental impact statement for that program, which could include a facility-specific analysis of the proposed LANL BSL-3 facility.

Respectfully submitted,

Penelope Mc Mullen

[redacted]

© [redacted] 2001

prepared for Tom Rush

An overview of comments on the Predecisional Draft Environmental Assessment for Siting a BioSafety Level 3 Facility at the NNSA facility Los Alamos National Laboratory.[1]

Prepared by Eric Fairfield, President and CEO, [redacted]
Document started on November 5, 2001
Last update 11/14/2001 1:59 PM

Given my 25 years experience with biological containment facilities, the environmental assessment document, the measured number of leakages at other sites, the track record of Los Alamos National Laboratory and the Albuquerque operations office with biologically select agents, and the attraction of the site to terrorists, I make the following estimates from the current data. The following are quick estimates. They have not been double-checked for accuracy nor have appropriate standard errors been associated with them. Better ones could be made if needed.

I estimate that there would be 642 minor events per year, most done by part time workers. I expect that there would be3.41 major events per year. I project that the yearly fatalities from minor events would be 64 and from major events would be 160. Thus the total projected yearly fatalities generated by this facility would be 225 under the current EA and supporting procedures. The yearly cost for remediating these events is expected to be $2,293,826,000 .

This number of yearly deaths and this amount of yearly remediation costs is too high to allow the facility to continue in operation. So I asked, is there a way to drop the number of deaths and the yearly remediation costs. The method that I have used amounts to being fanatical about cleanliness, training for all workers who come in contact with the facility, incident handling, and restricted access to the building. The method also requires that the personnel responsible for the safety of the building be highly trained, ensure day-to-day compliant operation, and fire or exclude any employee who does not conform to the restrictive use of the building. The restrictive behaviors are more finicky than any non=biologist and even most biologists are used to or want to do.

With the proper managerial authority and responsibility, it seems that the yearly death rate might be held to 0.3 and the yearly remediation costs could be held to $4,774,333 . The construction costs and time are not expected to be increased by more than a few percent. The ongoing operating costs of the facility might be reduced slightly.

The key parts of this improved plan[2] are a level of physical security that is constant and would seem to rival the security for plutonium. I think that the DOE needs a safe secure BSL3 facility somewhere. This document attempts to quantify safety concerns and is a condensation of about 25 pages of my preliminary analysis of the proposed BSL3 facility.

[1] The big argument against putting the facility in Los Alamos is the trucking of waste to Rio Rancho.
[2] Because the released organisms can be transferred so easily by air, soil, or people and can grow in the environment.

Draft – Not for distribution

Comments on the Predecisional Draft Environmental Assessment for the Proposed Biosafety Level 3 Facility at Los Alamos National Laboratory

Return to: Department of Energy, National Nuclear Security Administration
Los Alamos Area Office
Attn: Elizabeth Withers
528 35th Street
Los Alamos, New Mexico 87544

Date: November 14 , 2001

Document Media Notices
Send to Peggy Prinz (E-mail)
"At least a week before the meeting"

Colin King, Energy Nuclear Watch
never got copy of the EA
Received it on Monday

Building lifetime(years)	30	
Terrorist events per year	0.5	
Expected lethality of a major event		
Minimum lethality	3	
Expected maximum lethality	20,000	
Cost per death	$ 10,000,000	
Events	5	
Employees	100	
Current/month	6	6
New transactions per month	60	60
Employees	10	10
Events per employee per year	0.1	
Temporary	30	4
Events per temporary employee per year	3	0.1
Procedures	3	1
Track record of Los Alamos National Laboratory	3	1
Research park correction	1.5	1
Temporary percent time	0.2	
Cleanup (minor event)	$ 12,000	
Cleanup (major event)	$ 200,000,000	

	Events per year	
	Projected	Better practices
Terrorism	0.2	0.0167
Procedures	641	5.4
Construction	0.5	0.1
Total	642	5.5
	Human cost of events	
Lethality per minor event	0.10	0.05
Projected deaths per year from minor events	64	0.275
Fraction of events that are major events	0.5%	0.1%
Major events per year	3.41	0.02
Lethality per major event	50	5
Deaths from major events per year	160	0.028
Total expected deaths per year	225	0.3
Total expected yearly cleanup costs	$ 2,293,826,000	$ 4,774,333
Life of project totals		
Deaths	6738	9
Cleanup costs	$ 68,814,780,000	$ 143,230,000

Comments on the Predecisional Draft Environmental Assessment for the Proposed Biosafety Level 3 Facility at Los Alamos National Laboratory

Return to: Department of Energy, National Nuclear Security Administration
Los Alamos Area Office
Attn: Elizabeth Withers
528 35th Street
Los Alamos, New Mexico 87544

Date: November 14, 2001

Is this the right ~~role~~ role/mission for LANL and is this and the right place role a conflict of having capability for Biodefense at a Nuclear Weapons Lab.

Comments on the Predecisional Draft Environmental Assessment for the Proposed Biosafety Level 3 Facility at Los Alamos National Laboratory

Return to: Department of Energy, National Nuclear Security Administration
Los Alamos Area Office
Attn: Elizabeth Withers
528 35th Street
Los Alamos, New Mexico 87544

Date: November 14, 2001

Investigate/consider detectors like those made for the military by Eberline/Siemens.

Ask if other BSL-3 facilities have/use detectors.