November 14, 2001

DOE-LAO
528 35th St.
Los Alamos, NM 87544
Attn: Elizabeth Withers

Dear Ms. Withers and Biosafety Laboratory Assesment Committee:

Yesterday, while eating lunch in Santa Fe, I had a chance to read the Albuquerque Journal. I was surprised to see that The DOE had scheduled a public meeting on the proposed new Biosafety 3 Facility at LANL. I can't say I have seen the subject discussed at all recently in the Los Alamos Monitor. Then last night they too had an article.

Now I better understand a call to our home from a reporter 11-12-01, asking if I had a comment on the proposed Biosafety 3 Laboratory. I declined.

Oddly synchronistically, several years ago, while eating lunch in Santa Fe at the same restaurant, I had read a newspaper I usually don't read. I was disquieted to realize, a onetime only meeting was to be held that night in White Rock, where I live. It concerned a Proposal to begin precedent setting, open air, testing of experimental biohazard detecting instruments. Aerosolized strains of bacillus subtilis, were to be dispersed into the air of Site 33, a mile, possibly less from the nearest homes in our neighborhood.

On the way home I listed questions and concerns that came to mind. I intended to write them down and request a written answer. However, I did not have the time to get that done, so went to the meeting to "listen." Unfortunately, in towns like Los Alamos, there is the to be expected reluctance to "Question Authority." There were only a few local residents of a mind to raise concerns. Those from neighboring areas did comment. There also were a number of speakers, who seemed to have a dismissive bluster toward those with the timerity to question The Proposal. One gentleman, I believe once at White Sands seemed to be saying that sans safety masks, etc. he had worked extensively with bacillus subtilis, and see, he was just fine. Another, seemed to challenge others to remember, we here depend on research, and how dare ANYONE say "Not in my backyard."

Well, despite asking my husband to figurativly "tie my foot to the mast (chair) like Ulysses, so I would not be enticed to speak at the

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:

Concerned Citizens for Nuclear Safety (CCNS) opposes the predecisional draft Environmental Assessment (EA) for the proposed Biosafety Level 3 (BSL-3) Facility at Los Alamos National Laboratory (LANL). The EA 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 significant 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...." Another outstanding issue is where the disposal site for the BSL-3 waste would be. The EA lacks a complete seismic activity analysis; an analysis of increased transportation risk for the communities along the transportation routes; and a review of the long-term stewardship considerations.

The 21-day comment period is too short for a complete review of the large EA. CCNS requests a 120-day comment period on the EA as well as a complete Environmental Impact Statement for the BSL-3 proposal.

Sincerely,

Joni Arends

Joni Arends
Waste Programs Director

me. I hope any delay in the mail will not relegate this several hour effort to the round file.

1. Because of what I felt was possibly going to be an ill concieved, low budget, non-Envioronmntal Impact Study activity at SITE 33 several years ago. One that had a great likelyhood of being in effect at this moment, except for a letter requesting the hearing by someone in my neighborhood (not me), and the apparent reassessment of the plan, I am asking the following:

A. That this precedent setting Biohazard 3 facility be given the funding and location to make it a true asset to national research, LANL, the Community of Los Alamos, and all of New Mexico.
B. That it's construction and location be carefully assessed to truly minimize any hazard to residents, lab workers and the environment.
C. That an Environmental Impact Study be included, for the reason that such studies were developed, to assure that broader ovesight is maintained and the result is not a pound foolish pennywise solution to a long term need.

I wish to request that I receive a transcript of the meeting to be held on November 14, and an acknowledgement that this letter has been received.

Thank you.

Sincerely,

M. Buchholz

meeting," I decided that my questions were not being addressed and I got in line to ask them, and to ask the blithe gentleman exactly where his backyard was.

As I got to microphone, I turned to ask the blithe & blustery gentleman just how far HE lived from SITE 33 where bacillus subtilis, possibly genetically altered or marked, would be aerosolized a bare mesa away from my home. Not surprisingly, the place where he and several other of the confident and imposing gentlemen had been sitting was now vacant. So much for the depth of their interest in the one public discussion.

Indeed, I did say I had lived in my home, a wind whiff away from Site 33 for over 30 years. Indeed, it sounded like though employees at the site would be required to wear respirators during their experiments to handle these USUALLY harmless sporeforming microbes, we in the neighborhood would have no such protection.

Having long lived in Los Alamos, family members having worked at LANL, I said we had not particularly worried in the past about dangers from LANL facilities. Nevertheless, any new and precedent setting effort, particularly the way this one sounded, needed a clear Environmental Impact Statement and the perspective and objectivity interjected by outside participation.

I also felt that the site of actual testing of any new biodection devices should at the very least be 1. Either in an enclosed area. 2. In an outside area at special biotest ranges far from residences such as White Sands, Dugway, China Lake or others. 3. If at LANL, at the the very least somewhere far, far from homes. At the center of LANL Property.

I had a fair list of specific questions. I felt I had legitimate concerns as one of the residents closest to SITE 33. However, I found myself misquoted in the newspapers. An obviously demeaning photo was chosen, of the several taken, to appear on the front page of a New Mexico paper. There was even a truly chilling editorial in the local paper, concerning any of those who would raise personal concerns about how research might be done, to avoid undue hazards to residents, since time and money were of the utmost importance.

Today seems to be the one short opportunity for Los Alamos residents to voice their questions and concerns, on this precedent setting endeavor. It has been sparsely discussed in the local media, and for most of us little understood. I have not seen previous indications that input was solicited, an address or an eventual deadline.

I feel it is best to write you at this time, and hopefully avoid misquotes or other past misunderstanding. I will have to send it in the mail. The almost unaccomplishable deadline of November 19 on comments, concerning an obviously long planned and momentous a Proposal, saddens

11/15/01
4:00pm
GRW

Phone Log:

Tish Demmin [redacted]

[redacted]

- Have I seen Nov. 12th issue of new Yorker? Anthrax spread in NY was from Ft. District and it was weaponized.

Comment:

In 1989 people become ill from ethnyptoplan. Dus in NM identifed illness. Japanese pharamsutical company had sujected bacteria to radiation and the drug produced killed people. NI H would say that having biolab where radioactivity is present is not good idea. This a threat to public health. now I am ademant about not having this lab at LANM. Danager is mutation. LANL serves purpose but shoulda & have this

Withers, Elizabeth

From: Rebecca Christman[redacted]
Sent: Tuesday, January 15, 2002 9:29 AM
To: Withers, Elizabeth
Subject: Proposed construction and operation of Biosafety Level 3 Facility at Los Alamos DOE/EA-1364

Miss Elizabeth Withers
NEPA Compliance Officer
Office of Environment

Dear Ms. Withers:

There are too many uncertainities that are not addressed in the draft Environmental Assessment for the proposed Biosafety Level 3 Facility at LANL. These include a incomplete analysis of the human health risks; where the BLS-3 waste would be disposed; a complete seismic activity analysis and increased transportation risk analysis.

Thus, I request a period for public comment and public hearing of a full Environmental Impact Statement prepared by Department of Energy and National Nuclear Security Adminiatration.

I appreciate this opportunity to comment on the EA.

Sincerely,

Rebecca Christman
[redacted]

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

Concern about access to BSL 3 spaces by unqualified people

Clarify How to assure that non BSL-3 spaces are "Clean/Safe"

Tom For Eric

Withers, Elizabeth

From: Eric Jette[SMTP:[redacted]
Sent: Tuesday, January 15, 2002 11:17 PM
To: Withers, Elizabeth
Subject: "Powell Doctrine"-Exit Options(part2-"Isotope Road")
Importance: High

Powelldoctrine-Exitoptions.txt ArafatSharon-WalkingAmerica.txt Lessonsfromhistory.txt

To whom it may concern, Bio-weapons are an international disgrace, have been since WW1. Time to ban them, worldwide.

>Date: Tue, 15 Jan 2002 22:59:58 -0700
>To: policy@mail.house.gov
>From: Eric Jette <[redacted]
>Subject: "Powell Doctrine"-Exit Options(part2-"Isotope Road")

> Dear Rep.Cox, The light at the end of the tunnel is that of reason.
> the att. texts speak for themselves, I hope you'll consider these words.
>>>Date: Thu, 10 Jan 2002 19:41:48 -0700
>>>"
pres
enat
,sen
enat
>>>From: Eric Jette [redacted]
>>>Subject: "Powell Doctrine"-Exit Options(part2-"Isotope Road")
>>>X-Attachments: C:\My Documents\Powelldoctrine-Exitoptions.txt; C:\My Documents\ArafatSharon-WalkingAmerica.txt;
>>>
>>>Greetings,and a happy New Year to one and all,
In "Exit options"(State Dept.email 9/19/01) I indicated that my family background played a part in my writing, and it is to this background, and the unique perspective that it gives me, that I address the issues of missile defense, nuclear proliferation, the ABM treaty, the current political situation, and my personal vision for the future. As no one has yet formed a working "Exit option" for the Mideast, please try to visualize the events I write of in this "concrete" outline as if I were delivering it in person to Congress, as one citizen's testimony. That is simply to say, that I stand by my words. Any criticism contained in the following is directed toward policy and not individuals personally, the American way. For whatever inspiration it may have provided in finding solutions, "Exit options's" inspiration came partially as a result of viewing the CNN chat line comments for several hours Sept.11th, fully a third of which spoke of nuking Afghanistan. Mob mentality, on-line. This is my answer to them. I hope it serves as valid rebuttal to the recent nuclear posture review. As a member of one of America's first nuclear families, these subjects are unavoidably personal, my grandad did his job during a time of war, and helped end it. Family duty being what it is, I must follow through.
"Isotope Road"
In my grandad's day, some of his fellow scientists at Los Alamos had a "pool" going before the Trinity test as to how large the resulting explosion(in kilotons of TNT) would be. Anyone care to guess how many "Los Alamos's" there are today on the planet? How much Gross National Product is invested? To create weapons that cannot be used, and remain civilized. Some 300 billion a year for the last 50 yrs. on defense in this country alone, this is not for me to judge, as I haven't all the facts. I think it unfortunate, however, that it was deemed necessary, and I stress here the biggest "what if?" is what we might have accomplished as the Human species

January 15, 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,

(name) [redacted]

(address) [redacted]

(city, state, zip)

had we chosen to live in peace, instead of fear after WW2. We have lived so long with the reality of imminent destruction that we've become numb to it in ways that are as dysfunctional as the "Simpsons". One cannot simultaneously plan for the American dream, and prepare for Armageddon. Anyone who has witnessed the birth of one's child can tell you that yes indeed you create your own reality, the question is what do we wish to create for ourselves as reality on this planet, now and for our children's, and their children's future? Not just in this country, but the world as a whole, as an international vision.

Inherently, change is viewed with suspicion, as a threat to culture and ways of tradition and ethical belief systems. As it applies to developing countries in this nuclear age, the post-cold war aftermath presents a vast paradox that present no easy solutions, and has culminated in the reality of the war on terrorism as it exists today. We have an opportunity, to create a very positive change in the void left in the wake of the ABM treaty. The cold war's fundamental precepts being Mutually Assured Destruction, now that this concept has been abandoned as not being in the public's interest, we must construct a solid international understanding to create a Mutually Assured Peace, literally, though stated with a grain of salt, as M.A.D. will be reality for many years to come. The Chinese with only some twenty-odd warheads, present a credible deterrent to any aggressor, never mind the manpower. What reasonable explanation can anyone give for the combined total between the U.S. and the former USSR's nuclear stockpiles? To be real blunt, reducing the active numbers to around 2000 apiece does nothing to change the fact that we could make this entire planet look like Mars in a few hours time. We in America share a concept, united we stand, divided we fall. 9/11 has forced the world to grasp this concept, ready or not, globalization is at hand. A global response to chaos, a response to a threat I tried to warn the previous administration about 9 years ago.

I think the hardest perception for the U.S. to overcome in the developing nations is that of being arrogant and/or inconsistent in exerting its will, or muscle. Giant steps have been taken so far as this is concerned, to change this viewpoint, in my opinion. If one thinks of nations like the teams of the American league in baseball, is it any wonder that many hate the Yankees? They're almost always in the series. What gives them the respect is the sportsmanlike conduct towards other teams, with few exceptions. This simple example is manifest today in Afghanistan for all to see. We have an opportunity to preserve this momentum of international cooperation as it is reflected in this country's long term security, and the world's. Our commitment to this is only going to be fully manifest by the replacement of the ABM treaty with one that builds on the progress made, and prevents the militarizing of space. Without this as a goal, it's like quitting a job with none to go to. As for the proposed missile defense plan, M.A.D. is still a better defense in my opinion, and if we had only 50 warheads apiece, it would serve just as well(without threat of sharing the dinosaur's fate), to deter rogue nations. The U.S. and Russia must lead by example, Pakistan and India must not continue on their present course. Only by world opinion can the stage be set for that change. Otherwise Kashmir will suffer Afghanistan's agonies, or worse. If there are to be trillions spent on the development of the missile defense system, rather than dealing with the reasons for its need in the first place, then we've missed the point that was so rudely made, that a terrorist will use whatever is conveniently available as a weapon. This technology may prove useful in one way however, to address a threat as deadly to the planet as nuclear war, pointed outward and equipped with the warheads that we no longer point at each other, some defense against asteroid impact is possible. With shared expense, a shared defense, for all nations, or scrap the plan, in my opinion. I shudder to consider the effects of unilateral deployment of a expensive, questionably practical system at the expense of the international good will and respect that we see today, resulting in a continued arms race. The world community needs from us a comprehensive national foreign policy that is not subject to a lobbyist's lunch or the whim of elected officials, in my opinion, nothing short of a declaration of international policy and conduct in affairs associated will serve as a M.A.P. to replace the mistrust for our consistency, and intentions, something that will endure through time

as well as the Constitution.

If the U.S. is going to continue to reassess and scrap as necessary, treaties and agreements of the past, I wish to call into perspective the Israeli and Palestinian hostilities that to me, continues to endanger everyone. It is clear to me that without outside intervention, this area will not see lasting, or even a moment's peace. It is past time for a change, the citizens on both sides have suffered too long for the sake of national pride and bragging rights to land so steeped in each other's blood there is no letting go of the initial causes of conflict centuries ago. It has manifest itself in opposing, fixated viewpoints, and if the laws of motion are of any use, then Palestinians and Israelis will continue to fight unchecked until acted upon by an outside force. Not armed force, but withdrawal of U.S. support (especially military) will bring Israel to the table in a hurry. I think in fact, negotiating at a table will go nowhere, as the parties are sitting and not moving. I have suggested previously that if Arafat were serious about peace, he would walk the talk, and do a walking "Gandhi" like pilgrimage across this country, ending at the WTC sight in NYC, to renounce terrorism in general and discuss lasting peace with Sharon along the way. One foot in front of the other, in motion, one gains momentum, the road may be long, but there is an end.

At first they'll be no end to the protests by Israel of the withdrawal of U.S. support and like the story of the farmer's donkey trapped in the well, it took a while before the donkey realized that the dirt shoveled on top of him by the farmer was raising the ground beneath him as he shook it off. Rather than being buried alive, the donkey was able to step out of the well. So it goes with perception of change.

I have to respect the guts to seek change that the President has displayed. If he goes where no President has gone before, I trust we'll lend him a hand in finding that "Undiscovered Country" (global peace). I believe that the parties to the conflicts that are long standing in the Mideast, and Asia should take example from the agreements reached in Bonn. They had a limited time to come to terms and decide Afghanistan's future course, they have chosen to serve the people's interests first, and work together. There is only a limited window of opportunity, as full scale war is the end result of this continued fighting in the mideast and Kashmir. It must end as of yesterday. As a Buddhist, I have no side to be on in this personally, I'm just sick of being witness to it. As an American , I view the conflicts as a threat to our national interests and those of the world's community at large.

As a Human, I can only hope for an elevation of the level of consciousness between the parties as we have been recent witness to in Afghanistan.

If we were to implement these ideas, I think progress would be swift, inside of 2 months, Arafat, gaining the moral authority among his own people by his physical efforts and tired from it, will find a lasting solution with a reluctant, and much humbled, but satisfied, Sharon. Arafat's domestic support is key, a statement like this would ensure that and allow a sustained pause in hostilities as it will have been boiled down to these two individual's sustained efforts, day after day on CNN. Any nation has the right to defend itself, by our withdrawal and shift in position to neutral, we are preventing the spread of this conflict to our shores(as has happened) and protecting the citizens in so doing. I trust that my logic is clearly understood, the goals outlined, and I hope, worthy of your consideration. I have thought about these subjects for many, many years for it is family history that is involved, and a duty to my countrymen that the lessons learned in my grandad's era not be repeated or forgotten, I cannot tread lightly by any means, nor can I be anything but honest in my assessment of the subject, too much is at stake. Every living thing on this planet to be exact. When I consider the difference(by definition)between a terrorist and a freedom fighter, The targeting of civilians, and the methods employed may serve. The philosophy behind our revolution, the Constitution, the Bill of Rights, and the Declaration of Independence, was born from resistance to oppression with "live free, or die." being at the core of it. As Hammed Karzai recently intimated, this is the Afghan jihad, the true jihad, to be free to live in correctness with one

another. That jihad lies in one's heart, the struggle to live a correct life, in the eyes of the Creator of all. The commonality of the basic truths behind all the major religions of the world, is apparent to me, who could be so arrogant to think that they were the only ones chosen by God? The reasons behind the Palestinian uprising are similar, it is the methods employed that are objectionable by any standards of civilization, and they must realize them as self-defeating. In the past, Israel's survival has depended on our military assistance and support, but they are well able to defend themselves at this point. If the war on terrorism is to be successful, as defined also as terrorism directed at ethnic groups living in the U.S.(ie;attempted Jewish Defense league bombing of mosque in California.), we must not allow any terrorist organization, or states that sponsor them to feel immune from justice. The wake up call the Muslim world has had is only beginning to be realized, Iran is I think an appropriate example of the reassessment the Arab world is taking as it concerns America's intent. The great "Satan" was an illusion of America that I hope is forever shattered. So goes the call for a holy war to satisfy prophesy. It is readily apparent to all that these are the works of man. The good and the bad. Mideast peace is not as difficult to achieve as one may believe, it does require that the parties to it a quire a different mind set. As for creating the climate for that change in mindset to happen, we must be the instigators. When push comes to shove, we go through a revolution every four years or so around election time, or at least an insurrection of sorts. We do this peacefully, and by loyal opposition if so inclined. So it is with these thoughts put forward, as they may be a radical departure from any plan, or policy I have seen offered up, I hope they serve to broaden the possibilities and inspire debate, and resolution of these issues.

I realize in UBL's diatribes, he's called for our withdrawal of support for Israel, out of a psychotic desire to be the leader of the Muslim world. They say the meek shall inherit, I think it holds true, not only in Afghanistan, but for the fact that UBL has inherited nothing but world contempt. The reasons I have given for a reassessment of the security arrangements we have with Israel(and perhaps economic as well) are quite different than UBL's, as is the reasoning behind them being tendered. Essentially, Israel's policy's threaten the safety of American citizens, directly or not makes little difference in that fact, and needs to change. I believe that this presents good cause for my suggesting a course of action that will I believe, allow the U.S. to be in a better position to mediate a lasting peace, and close this sad chapter in world history.

As for Pakistan and India, rather than just asking them to get it together, and stand down, there may be the need for the U.S. to consider other options, to prevent the Asian sub-continent from becoming unininhabitable. In my opinion, nuclear war is the ultimate terrorist act. If these two nations cannot see the way to peace, then we just have to convince them, if need be, to prevent the loss of life and ecosystem, that cannot be replaced. If that worst case scenario occurs, the results of nuclear war having been studied, I don't need to remind anyone of the possible irreversible environmental damage, loss of life, etc. Just add to that a few Chernobles on top, in the case of this war, considering the nuclear power plants in the area. If they choose war, we must I believe, if we have the time and capacity to stop it, act in a considered and concrete way to prevent holocaust. In the fact that the timing of this situation stinks, I have to wonder if it smells of Al-Quaida, the resulting evidence of the groups responsible for the attacks in India, and their known support by both Pakistan and the Taliban suggests to me a connection. Done to help bin Ladin escape? Pakistan helps the U.S., Pakistan is targeted, via India. Despite the reliance on prophesy and questionable psychic resources, bin Ladin's not to be underestimated, he knows how to play a situation for all it's worth, I think it's evident to most Afghans at this point, that as a "guest" he broke every rule, including wrecking the host's dwelling. He may believe that widening the conflict will serve his ends, in the short term at least, I think it has. Until the Pak intelligence service is totally purged of all individuals supporting terrorism, we still will have serious problems down the road as well. India's not much better in some regards, if they have acted so wisely in Kashmir, why the conflict? M.Gandhi taught them nothing?

There's only one thing they can do with Kashmir to end this once and for all, that's to turn it into a "co-national park" with internationally(interim)monitored local rule. They either learn to share, or lose it forever, as the case may be if war happens. I hope that if the situation is not resolved by dialog, they'll end up thanking the U.S. in the long run, for stepping in to stop it. By whatever conventional military and diplomatic means available. We've been accused of playing world cop, as a nation. If you ask any officer on any street in the U.S. what his/her least favorite call to get is and they'll more than likely say, "Domestic disputes". This is the only politically correct way I can think to describe the current world situation. If we must play that role, they need to understand that there's a new sheriff in town, determined to prevent domestic violence. This goes as well for the mideast, the Korean, and other long standing conflicts. To "protect and serve humanity, and ensure the preservation of civilization, of all cultures, and ways of tradition that an individual or nation has the inalienable right to choose for themselves as they see fit, so long as it harms no other individual's, or nation's ability to do so." With this as our philosophy, as policy, the "undiscovered country" may become reality. This is not a role that should be played unilaterally, as it is essentially all nation's task.

I have been considering issues surrounding nuclear weapons all my adult life, on the flyleaf of my grandmother's book about Los Alamos, that I gave to Bill Clinton the day he was first elected President, I wrote, " This is a slice of times past, to give perspective on the present, so that in the future we can eliminate the threat of nuclear war. The greatest threat we face today is that terrorists will obtain nuclear weapons." I wonder if he had a chance to read it. "Inside Box 1663" may still be in the White house library for those interested. As a citizen who knows the history involved, coming from a reliable source, if you will, when I consider the failure to contain the spread of nuclear weapons and associated technology, and the current situation, putting the genie back in the bottle requires a miracle, you cannot un-invent something. From a cold standpoint of probability, nuclear weapons will eventually be used at some point unless the current world situation changes drastically for the better. The "Jette Doctrine" (in short) may simply be stated as, "By employing common logic and gut-instinct together with an open mind, one may anticipate miracles as a result." I define "miracle" as something good that defies probability and reasonable explanation for occurring.

If what we have been recent witness to in Afghanistan is example of a miracle, as defined, then there is hope. Having been in the construction industry much of my life, I can assure you all that we are in fact a nation of "nation builders" on many levels. Politically speaking, since WW2, it has been through "on the job training". The mistakes made in the past, and the correctness of present, or future policy must share one thing, a willingness to look at truth over viewpoint(or party affiliation).

As we are on the brink of colonizing Mars(20yrs.?), let us go to the "God of War" in peace, as a family of nations. A family that has overcome its dysfunctionalities. If mankind seriously dug up its past, archaeologists may possibly find the answers that will result in resolution of the nagging questions of mankind. I suggest starting with the Temple Mount in Israel, Muslim and Jews take it apart with all the respect due, and don't stop digging until the facts are revealed, then they build a new one in friendship, together. A "concrete" plan for peace, and a sociologically sound idea, but impractical without the will. The problem started there, and it ends there as the most direct way of finding resolution, permanently. To achieve peace, nations must be brave enough to look at the past in general, and be more creative in future vision than the kid in Afghanistan, who reportedly had nothing he could count on in life, except the anti-tank missile he slept with. I wonder if he's sold it by now, and bought a kite. I wish to extend my best wishes and an invitation to Hamid Karzai to visit Santa Fe and Taos, New Mexico, an area geographically similar to Afghanistan, with multiple local cultures, and refugee communities from around the world, all living in peace. This may provide him with solid inspiration for his task ahead. Perhaps the Secretary of Defense, knowing the area well, will concur. To all of you and your hard working staff members, thanks for hearing my thoughts on these issues. The

faces of the people of Afghanistan are the best indicator of your incredible job performance, they serve as a living memorial to the victims of Sept.11th, the flame of which will stay lit as long as there is hope in their eyes, and kites are flying instead of bullets.

>>>
>>>Sincerely,
Eric Jette
[redacted]

>>>1/8/02
>>>
>>>
>>
>

[redacted]

BUSINESS FAX [redacted]

Date: 11/15/02 **Time:** 9:50 P.M.

From: JONI ARENDS

PLEASE DELIVER TO:

Name: ELIZABETH WITHERS
NEPA COMPLIANCE OFFICER

Company: DOE AOO LAAO

Fax Number: 505 667-9998

We are sending a total of 16 **page(s) including this cover sheet. If you do not receive all of the pages, please contact us as soon as possible at the above telephone number.**

COMMENTS:

ELIZABETH,

ATTACHED ARE 15 LETTERS REQUESTING AN EXTENSION OF TIME TO COMMENT ON THE DRAFT EA FOR THE BSL-3 AND AN ENVIRONMENTAL IMPACT STUDY FOR THE PROPOSAL.

CCNS ALSO REQUESTS AN EXTENSION OF TIME DUE TO THE LACK OF AVAILABILITY OF DOCUMENTS, SPECIFICALLY THE SEISMIC STUDY FOR TA-3.

I WILL SEND THE LETTERS TO YOU TOMORROW. SHOULD YOU HAVE ANY QUESTIONS, PLEASE CALL ME. THANK YOU!

JONI ARENDS

[redacted]

3:45pm Tuesday January 15, 2002

Elizabeth Withers - Caller: Rochelle Reef, [redacted]

Wants to have a 120 day comment period and DOE should perform a full EIS. Since there has never been a biofacility at a nuclear weapons facility, a full EIS is necessary. Doesn't believe the DOE should have a BSL-3 facility at all. Waste is a concern since nuclear waste dumping occured a long time ago at LANL - doesn't want anything like that to happen again.

Withers, Elizabeth

From: reuben lebeer[SMTP[redacted]
Sent: Tuesday, January 15, 2002 1:26 PM
To: Withers, Elizabeth
Subject: (BSL-3)facility I oppose

Ms. Elizabeth Withers
NEPA Compliance Officer

Dear Ms. Withers, I am writing to state my opposition to the proposed Biosafety level 3 Facility and to urge you and your peers and co-workers to reject this proposal. I am worried about the possible environmental impact of the agents being studied. The threat of accidents or of sabotage is always a reality, no matter how much security there is. In my opinion, this study has come about through fear, while in the meantime the government and the military are being completely unreserved in their vengeance toward Afghanistan, therefore risking the chance of inducing more violence and possible sabotage of facilities such as the BSL-3 in Los Alamos. Please respect my point of view, as it is quite reasonable.
Thanks, Reuben Leber
[redacted]

Do You Yahoo!?

1-15-02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Emily Boade

Name Emily Boade

[redacted]

Address

[redacted]

City, State, ZIP code [redacted]

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Ben Jae Boni

Name

[redacted]

Address

[redacted]

City, State, ZIP code

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Name

[redacted]

Address

[redacted]

City, State, ZIP code

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

FRED Altenbach

Name

[redacted]

Address

[redacted]

City, State, ZIP code

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Lela Perez
Name

[redacted]
Address

[redacted]
City, State, ZIP code

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Joyce Zullo
Name

[redacted]
Address

[redacted]
City, State, ZIP code

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Mary Lantz
Name

[redacted]
Address

[redacted]
City, State, ZIP code

1-15-02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Liia Warshawski (Liia Warshawski)
Name

[redacted]
Address

[redacted]
City, State, ZIP code

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Tamara A. Knopf
Name

[redacted]
Address

[redacted]
City, State, ZIP code

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Shelley Buonaiuto
Name

[redacted]
Address

[redacted]
City, State, ZIP code

Shelley Buonaiuto

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Zack Obrey
Name

[redacted]
Address

[redacted]
City, State, ZIP code

1/15/02

Elizabeth Withers
NEPA Compliance Officer
DOE LAAO
528 35th Street
Los Alamos N.M. 87544

Dear Ms. Withers,

I am writing to express strong support for Senator Bingaman's and Representative Udall's letters to your office requesting a 120 day comment period and a full Environmental Impact Statement for the proposed BSL-3 facility at Los Alamos National Laboratory.

Sincerely,

Cina Littlebird
Name

[redacted]
Address

[redacted]
City, State, ZIP code

January 15, 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,

Barbara Alpert

(name) [redacted]

(address) [redacted]

(city, state, zip)

January 15, 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.

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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,

Deborah W. Rude

(name) [redacted]

(address) [redacted]

(city, state, zip)

January 15, 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:

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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,

Sarah Lovett

(name)

[redacted]

(address)

[redacted]

(city, state, zip)

11/15/01 Phone log
Anne Phillips [redacted]

[redacted]

want a
120 day extention on the
BSL-3 Bioweapons Facility EA

November 15, 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

Citizen Action

Address [redacted]

[redacted]

11/15/01

To: Elizabeth R. Withers
NEPA Compliance Officer
Office of the Environment
528 35th St.
Los Alamos NM 87544

Dear Ms. Withers,

As a citizen of New Mexico, I deplore the LANL proposal to build a BSL-3 lab for the study of anthrax and other deadly microbes. If such research is really for protective purposes only, it should not be carried out at a weapons facility; it should be located in a CDC facility, and in a place where public exposure (in case of "accident") is not even a remote possibility. Surely not Los Alamos.

To my knowledge, there have been no public hearings on the proposal, and I find the suggested time-line irresponsible and unconscionable. I strongly urge that any movement on the proposal be deferred until there has been ample opportunity for public consideration and feedback. I recommend public hearings be held in January, with at least two weeks following for further comments.

In my opinion, this beautiful state is already outrageously contaminated with toxic stuff. Money - which seems to be a major motivator, rarely reaches the pockets of the folks who need it — witness our record in education and poverty levels. Please pay attention to opposition voices.

Sincerely,
Elaine Brewster

From: Withers, Elizabeth
Sent: Thursday, November 15, 2001 6:55 PM
To: Rush, Thomas
Subject: FW: BSL-3 facility

please print out and place a copy in the batch of copies I left for you and also one in the folder of originals. Thanks.

From: Lisbet Schwartz[SMTP:
Sent: Thursday, November 15, 2001 5:04 PM
To: Withers, Elizabeth
Subject: BSL-3 facility

Dear MS Withers:

I am requesting a 120 day extension of the public review and comment period on the EA for the BSL-3 facility proposed for LANL. Also, please have WELL PUBLICISED hearings - especially in Santa Fe and Taos.

Thankyou,

Liz Schwartz

87514

November 15, 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,

María Martínez

María Martínez
Name

[redacted]

City, State, ZIP [redacted]

Withers, Elizabeth

From: Colin King[redacted]
Sent: Thursday, November 15, 2001 2:50 PM
To: rhull%lata.com@internet.al.gov
Cc: Withers, Elizabeth; [redacted]
Subject: BLS-3 EA Document Requests

NEPA_Documents.doc ATT78923.txt

Bob,

It was a pleasure to meet with you yesterday evening at the Los Alamos Inn. Regarding our conversation Re: referenced document availability for the Draft EA on the BSL-3 facility, I have compiled a list of documents that the local advocacy groups, myself included, would like to receive. This list is pasted below as well as attached as a Microsoft Word 98 document. I should remind you that the Council on Environmental Quality mandates 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)

Thank you in advance for your prompt response.

Sincerely,
Colin King
[redacted]

List of Requested Documents:

1) "Biosafety in Microbiological and Biomedical Laboratories, 4th edition," CDC.
2) "LIR 300-00-05.0," LANL.
3) "The Safe Handling, Transfer, and Receipt of Biological Etiologic Agents at Department of Energy Facilities," Notice N 450.7, DOE
4) "IBC Charter" Referenced at Section 2.1.2, p. 24, DOE/EA-1364.
5) LANL Safety and Security documents (Facility Safety Basis, Facility Safety Plans, Hazard Control Plans, security assessments) Referenced at Section 2.1.2, p. 24, DOE/EA-1364.
6) "Biological and Chemical Terrorism: Strategic Plan for Preparedness and Response; Recommendations of the CDC Strategic Planning Workgroup," US Department of HHS, CDC, Morbidity and Mortality Weekly Report; Recommendations and Reports, Vol. 49, No. RR-4 (April 21, 2000).
7) "Industrial Hygiene Practices," DOE, Area OCSH (DOE-STD-6005-2001).
8) "Hazardous Materials Shipments," Office of Hazardous Materials Safety; Research and Special Programs Administration, US DOT (October 1998)
9) "Stratigraphy and Geologic Structure at the SCC and NISC Bulding Sites, Technical Area 3, Los Alamos National Laboratory," LANL, LA-13507-MS.
10) Stratigraphy and Geologic Structure at the Chemical and Metallurgy (CMR) Building, Technical Area 3, Los Alamos National Laboratory," LANL, LA-13522-MS.
11) "LIR 402-530-00.1."
12) "LIR 300-00-01.1"

13) "LIR 405-10-01.1"
14) "Preliminary Hazards Analysis for the Biosafety Level-3 Laboratory at Los Alamos National Laboratory," LANL, LA-UR-01-1337.
15) Personal communication e-mail from Tom Rush, DOE-LAAO to Robert Hull, Los Alamos Technical Associates, Inc., Subject: BSL-3 Functions and Operations (October 23, 2001)
16) Personal communications e-mail from Tom Rush, DOE-LAAO to Robert Hull, Los Alamos Technical Associates, Inc., Subject: BSL-3 Security (October 23, 2001)
17) "Seismic Hazards Evaluation of the Los Alamos National Laboratory, Final Report, Vol. III," Woodward-Clyde Federal Services, Oakland, CA (February 1995).
18) "Final Programmatic Environmental Impact Statement; Biological Defense Research Program," US Department of the Army, Fort Detrick, MD (April 1989)
19) "Final Environmental Impact Statement, Life Sciences Test Facility, dugway Proving Ground, Utah," Dynamic Corporation, Rockville, MD, for the US Department of the Army (March 1992)

List of Requested Documents:

1) "Biosafety in Microbiological and Biomedical Laboratories, 4th edition," CDC.
2) "LIR 300-00-05.0," LANL.
3) "The Safe Handling, Transfer, and Receipt of Biological Etiologic Agents at Departm Energy Facilities," Notice N 450.7, DOE
4) "IBC Charter" Referenced at Section 2.1.2, p. 24, DOE/EA-1364.
5) LANL Safety and Security documents (Facility Safety Basis, Facility Safety Plans, Ha Control Plans, security assessments) Referenced at Section 2.1.2, p. 24, DOE/EA-136
6) "Biological and Chemical Terrorism: Strategic Plan for Preparedness and Response; Recommendations of the CDC Strategic Planning Workgroup," US Department of HE CDC, Morbidity and Mortality Weekly Report; Recommendations and Reports, Vol. RR-4 (April 21, 2000).
7) "Industrial Hygiene Practices," DOE, Area OCSH (DOE-STD-6005-2001).
8) "Hazardous Materials Shipments," Office of Hazardous Materials Safety; Research ar Special Programs Administration, US DOT (October 1998)
9) "Stratigraphy and Geologic Structure at the SCC and NISC Bulding Sites, Technical Los Alamos National Laboratory," LANL, LA-13507-MS.
10) Stratigraphy and Geologic Structure at the Chemical and Metallurgy (CMR) Building Technical Area 3, Los Alamos National Laboratory," LANL, LA-13522-MS.
11) "LIR 402-530-00.1."
12) "LIR 300-00-01.1"
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19) "Final Environmental Impact Statement, Life Sciences Test Facility, dugway Proving Ground, Utah," Dynamic Corporation, Rockville, MD, for the US Department of the (March 1992)

ATT78923.txt

--
==========
Colin King
Technologies Director/Research Director
[redacted]

"I have become death, the shatterer of worlds."

J. Robert Oppenheimer quoting the Bhegavad-Gita after the detonation of the Trinity Device near Soccoro, NM, July 16, 1945.

11/15/01 Phone log.

Susan Swartz
[redacted]

- wants the comment period to be longer

- wants an EIS

[redacted]

From: Withers, Elizabeth
Sent: Thursday, November 15, 2001 6:53 PM
To: Rush, Thomas
Subject: FW: biosafety facility

Please print out and place a copy with the batch I left in your box and add one to the folder with originals. Thanks.

From: Penny McMullen [redacted]
Sent: Thursday, November 15, 2001 4:10 PM
To: Withers, Elizabeth
Subject: biosafety facility

Dear Elizabeth Withers:

I am a Sister of Loretto, and I took LANL's proposal about a biosafety facility to our Future's meeting in Las Cruces last weekend. Fifty members of the Loretto Community attended, and all are concerned about this proposal.

We would like an extension on the review period. Merely 3 weeks is not enough time for concerned citizens to adequately study such a serious proposal. Please give us more time.

Thank you,
Penelope McMullen, SL
[redacted]

11/15/01
4:00pm
GRW

Phone Log:

Tish Demmin [redacted]

[redacted]

- Have I seen Nov. 12th issue of new Yorker? Anthrax spread in NY was from Ft. District and it was weaponized.

Comment:

In 1989 people become ill from ethnyptoplan. Dus in NM identifed illness. Japanese pharamsutical company had sujected bacteria to radiation and the drug produced killed people. NI H would say that having biolab where radioactivity is present is not good idea. This a threat to public health. now I am ademant about not having this lab at LANM. Danager is mutation. LANL serves purpose but shoulda & have this

I have the feeling that the whole landscape has changed concerning need, which would be part of the scopeing process required for an EIS and that this new reality of non-hypothetical terrorism, makes the need more defined. The history of human and animal testing by government scientists using radioactive agents has been long and largely meangingless as many helpless creatures die hideous deaths doing the same old experiments again and again. I do not feel good at all about the animal test aspects of this facility and in fact, the thought is nauseating. It does not have the respect for life which can create a positive influence in our world. All those poor dead little critters, it is a shameful insult to God's loving gifts. I support an ethical review pannel to screen all requests for use of any such facility.

Issues of runoff and drainage from the three proposed options interest me and this document does not detail the processes for disposal of waste contaminated by the bubonic plague, for example. Section 3.3.4, at the top of page 48 does little to put my mind at rest. And so it is NOT reassuring to read on to see that the solid waste will end up in the Los Alamos County landfill. It will be completely main-streamed with no special precautions for the highly contagious nature of the presumed waste. Then in the Hazardous Waste section which is "converted to solid waste after treatment with autoclaving (PC2001h)." But "autoclaving" is not in the glossary. So, what does it mean? We are expected to trust the structure in place, but don't.

This is the largest EA in my collection, and some EISs are smaller, but it does not begin to cover the information. These questions must be added to my first collection which included the virus which caused the flu of 1918. I would suggest that an honest assessment of the present program and an EIS has got to be prepared in a thoughtful and thorough process. This is a proposal that would substantially alter the undeveloped character of an area.

Yours in peace,

bonnie bonneau

bonnie bonneau

Date 12/16/01

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 granted comment period was inadequate in length given a 21-day deadline that wasn't adequately notified and publicized, the complexity of the issues, the lack of availability of critical DOE supporting documents and numerous public (and two congressional) requests to extend the comment period.~~
- 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. 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.
- The seriousness of the issues related to the proposed LANL BSL-3 facility and demonstrated "significant public interest" require that a more comprehensive 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 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.

Respectfully submitted,
Name and address

Judge Olivia Bonde

[redacted]

(former Los Alamos resident)

United States Senate

November 16, 2001

Ms. Elizabeth Withers
NEPA Compliance Officer
Office of Environment
528 35th Street
Los Alamos, NM 87533

Dear Ms. Withers:

I am writing to express my support for an extension of the public comment period for the Predecisional Draft Environmental Assessment (#1364) titled the "Proposed Construction and Operation of a Biosafety Level 3 Facility at Los Alamos National Laboratory."

Members of the community interested in the proposed project have requested that more time be given to study and understand the Draft Environmental Assessment. It has been suggested that a 120 day extension would be appropriate along with an additional public hearing. An extension of the public comment period could strengthen the quality of the project and may in the best interest of enhancing the public process.

Thank you for your consideration and if you should have any questions, please do not hesitate to call Terry Brunner of my Santa Fe staff at (505) 988-6647.

Sincerely,

Jeff Bingaman
United States Senator

JB/tb

2) The Draft Environmental Assessment Fails to Adequately Analyze Accidents Involving the BSL-3 Facility Leading to the Spread of Infectious Agents

a) For its analysis of abnormal events and accident scenarios, the Draft Environmental Assessment essentially relies on a literature search concerning incidents of infectious materials released from catastrophic accidents at microbiological laboratories operated by the U.S. Army. "Based on this historical information, this hypothetical scenario was not analyzed further in this EA." (p. 70). NRDC finds that this analysis of abnormal events and accident scenarios does not remotely support the requirements of NEPA. There have been catastrophic accidents at biological weapons facilities in the former Soviet Union. Further, the analysis fails to investigate whether any accidents have occurred at private facilities that involved the spread of infectious agents. If the Environmental Assessment draws upon historical incidents for the analysis of abnormal events and accident scenarios pertinent to the proposed BSL-3, then it is reasonable and necessary to review all available data. There is a high probability that resources at LANL could provide information about catastrophic accidents at Soviet biological weapons facilities.

b) More importantly, it is necessary to analyze specific accident scenarios involving the LANL BSL-3 facility. Again, resources at LANL could be drawn upon to analyze dispersion of infectious agents from accidental, initially undetected infection of workers, or catastrophic accidents compromising the integrity of the proposed BSL-3 facility

3) The Draft Environmental Assessment on the Proposed BSL-3 Facility at LANL requires the support of a larger Programmatic EIS to Satisfy NEPA Requirements.

The lead agency for the LANL BSL-3 Draft Environmental Assessment, the National Nuclear Security Administration (NNSA) initiated the Chemical and Biological National Security Program (CBNP) in 1997 (CBNP FY00 Annual Report, NNSA Office of Nonproliferation Research and Engineering). Despite being a rapidly growing program encompassing numerous facilities around the country, the CBNP has never undergone a programmatic review. It is NRDC's contention that the CBNP is operating unlawfully in the absence of a programmatic EIS as required under federal law by NEPA.

4) The Draft EA must discuss security measures to prevent theft of infectious agents from the proposed BSL-3 facility at LANL.

As the recent anthrax attacks and subsequent deaths have shown, theft of infectious agents for terrorist purposes is a clear and present danger associated with all BSL-3 facilities. The Draft EA must discuss security measures to prevent theft of infectious agents both from the proposed BSL-3 facility and during transportation of infectious agents to and from the proposed BSL facility. The Draft EA should include a discussion of the design basis internal and external threats to the facility and the security measures taken to meet these threats.