

## ***Risks and Flaws*** ***LANL's Environmental Assessment for the Proposed Bio-hazard Facility***

### **RISKS**

- Los Alamos National Laboratory (LANL) has written itself a blank check with the bio-agents that it proposes to study. In addition to the viral and bacterial agents such as the deadly anthrax, plague, and Q fever, they leave open the door to study agents that are currently unregulated by federal health agencies like the Centers for Disease Control and Prevention (CDC). These unregulated agents could include dangerous emerging diseases for which there is no cure.
- LANL dismisses the threat of terrorism, stating that terrorist acts “are not reasonably foreseeable events,” despite the terrible events of September 11 and the anthrax attacks of last October. Furthermore, many of the proposed agents LANL will study are those historically used for bioweapons which are of great interest to terrorists, thereby making the LANL facility a more desirable terrorist target.
- LANL does not consider the possibility of a employee sabotage or theft, even though the anthrax used in last Octobers attacks has been identified with the strain developed in U.S. government laboratories.
- In its Environmental Assessment (EA), LANL fails to incorporate a preliminary vulnerability assessment for safety, a facility safety basis study, or a facility hazard control plan. Yet, despite its checkered history, the Lab makes categorical claims that all will be safe and secure.
- A recent Congressional study found that the armed guard force at LANL has decreased by 21% percent over the last decade, thus raising even greater security concerns about the Lab which has already been long plagued by security problems.
- LANL has weak institutional controls in its current biological research facility. As a result, there have been at least two cited occurrences with the bacterial anthrax that could have resulted in serious harm to Lab employees. There have been multiple other occurrences in the nuclear weapons side of the Laboratory.
- Biological samples would likely be sent through the U.S. Postal Service. However, there is growing concern about the security of U.S. mail services. With increased biological shipments, mail carriers and the biological material they carry could become targets for theft by people or organizations that wish to get a hold of these dangerous biological agents.

### **FLAWS**

- Over 300 hundred comments were submitted by the public to LANL on the environmental analysis. Of those, approximately 200 specifically asked for a more in-depth Environmental Impact Statement, including a request from Congressman Tom Udall. Despite the great number of comments LANL dismissed the requests for more detailed analysis.
- In addition to the comments submitted to LANL, a petition with 800 signatures was submitted requesting an Environmental Impact Statement. These signatures were not included in the comments on the Environmental Analysis, though LANL was required by law to include all public response received on the proposed facility.
- LANL grossly misstated demographic data for the region surrounding the Lab, as well as for New Mexico as a whole. For example, they stated that the population of Mora County was 98.8% white and that the State is 86.3% white. LANL's assertions fail to recognize the deep rooted Hispanic population and culture that has great historic significance to the region. A more accurate picture can be found by looking at the U.S. Census Bureau's 2000 data. The Bureau calculates that Mora County is 16.6% white and New Mexico is 66.8% white.
- LANL failed to include Rio Arriba County in its analysis of local impact that could result from the bio-hazard facility operations. Certainly LANL is aware of its neighboring county, home to the majority of its technical and custodial work force.
- The CDC has the authority to inspect bio-hazard facilities to ensure that they meet federal safety guidelines, yet for years LANL's lower risk facility had never undergone an inspection. Moreover, LANL has failed to outline a schedule of CDC inspections.
- The National Nuclear Security Administration, (the semi-autonomous agency within the Department of Energy that operates LANL, Lawrence Livermore National Lab and Sandia National Labs) has failed to conduct a programmatic environmental study of its large biological research program, despite strong evidence that such a study is required by law.
- Questions, comments, and corrections are always welcome. Please send them to Colin King at [colinking@nukewatch.org](mailto:colinking@nukewatch.org), or use the address and phone number below. August 27, 2002