

Nottingham, Valerie (NIH/OD/ORF)

From: Ira T. Holt [irachar@bitterroot.net]
Sent: Monday, January 19, 2004 2:10 PM
To: ORS RMLEIS (NIH/OD/ORS)
Subject: Supplemental Draft EIS for RML

I have reviewed the Dec 2003 copy of the EIS and believe that the few shortcomings I thought were in the original have been taken care of. The additional data on existing level 4 facilities was the main thing I thought lacking in the original. I have nothing further to add to my original comment that I fully support the proposed action. Thank you-
Ira T. Holt
548 Cielo Vista
Hamilton, MT 59840
406-961-3302

002

Nottingham, Valerie (NIH/OD/ORF)

From: WWFE [wwfe@ism.net]
Sent: Friday, January 16, 2004 9:25 AM
To: ORS RMLEIS (NIH/OD/ORS)
Subject: Rocky Mountain Labs

Hello Valerie Nottingham,

I wish to state my opposition to building a high containment facility at the Rocky Mountain Laboratories in Hamilton, Montana.

2-1 { The most dangerous pathogens in the world should be studied in the very locations most likely to be attacked. This lab should be built, for example, in the Pentagon, in Washington DC, not in rural Montana. This is a safety issue. If the pathogen labs are housed in a vitally critical location such as The Pentagon, I would be most assured of the absolute safety of the research.

Please do not permit a BSL-4 lab to be built in Hamilton, Montana.

Sincerely,

Gene Bernofsky
243 Mount Avenue
Missoula, Montana 59801

LETTER 1 - IRA T. HOLT

LETTER 2 - GENE BERNOFSKY

Comment

Response

2-1

Please see Sections 2.2.2 and 4.2.1 where this comment was addressed.

003

LETTER 3 - DAVID BALTIMORE

Nottingham, Valerie (NIH/OD/ORF)

From: Baltimore, David
Sent: Monday, January 19, 2004 1:20 PM
To: ORS RMLEIS (NIH/OD/ORS)
Subject: to Valerie Nottingham, Re: SDEIS for RML

Dear Ms. Nottingham,

I have read the Supplemental Draft EIS for the proposed BSL-4 facility at the Rocky Mountain Laboratories in Hamilton, MT. I own property and a home in Hamilton and am in the process of making a major investment in the property. I am also a virologist, in fact a Nobel Laureate for my work in virology, and the President of the California Institute of Technology.

I am totally convinced by the SDEIS and by everything I know about high containment facilities that the proposed laboratory will be safe for the residents of Hamilton, even those living closest to the laboratory. The danger in such facilities is quite minimal and then wholly focused on the workers who actually manipulate the virus and virus-infected materials. The idea that an epidemic might occur deriving from activities in the laboratory is not a credible concern to me.

I strongly urge that the BSL-4 facility in Hamilton be built. It will be an important contribution to the national effort to combat terrorism. It will also be of great assistance in dealing with emerging infectious agents like the SARS virus, which are sure to continue to be a problem in America and the world. America needs such facilities. Finally, the existence of the facility in Hamilton will attract skilled personnel to the area and increase the economic, educational and cultural base of Hamilton and Ravalli County.

Thank you for giving me the opportunity to comment on this issue.

Sincerely,

David Baltimore

--

David Baltimore
President
California Institute of Technology
Mail Code 204-31
Pasadena, CA 91125

Phone: 626-395-6301
Fax: 626-449-9374

LETTER 4 - EARL POLLARD

Nottingham, Valerie (NIH/OD/ORF)

From: Earl Pollard [emp@cybernet1.net]
Sent: Saturday, January 03, 2004 11:44 AM
To: ORS RMLEIS (NIH/OD/ORS)
Cc: Bloom, Marshall (NIH/NIAID)
Subject: Fw: Response to RML/ EIS
Follow Up Flag: Follow up
Flag Status: Flagged

Vallerie Nottingham:

My original comments I sent Friday, January 02, 2004, 3:24PM contained a serious omission of the word "not" which I have corrected herein. The second paragraph, 7th line should now read ".....he does not speak for even one percent of the citizens of the area...." I appologize for the blunder. Please destroy the initial letter and replace it with these corrected comments.

Earl Pollard

----- Original Message -----

From: Earl Pollard
To: orsrmleis-r@mail.nih.gov
Cc: mbloom@niaid.nih.gov
Sent: Friday, January 02, 2004 3:24 PM
Subject: Response to RML/ EIS

Vallerie Nottingham:

I have received a copy of the EIS and read the entire publication. The previous draft was a good document. The latest report is better. Specifically, the deeper coverage of safety considerations is more comprehensive and should be of great benefit to the vary few detractors who oppose the project. I have written before so I am repeating myself when I write that I reside approximately 100 yards from the North boundary fence line of the RML campus with a direct line of sight to the new level 3 installation. As a member of the Hamilton community with the aforementioned special circumstance I am perfectly at ease with the EIS and look forward to the new facility. My wife and I moved into our new home during the construction of the level 3 lab and watched that project develop to completion.

Now a word about the so-called opposition to the level 4 lab and the entire RML facility. The principle local opposition claims to be the Friends Of The Bitterroot (FOB). Because of my interest in this organization's opposition I attempted to obtain a membership list. Such a list was not available. Apparently the individual who claims to be the spokesman is speaking for himself, which in this case I expect nothing more from this person. Even if he is an authentic spokesman for something called the FOB, he does not speak for even one percent of the citizens of the area including Hamilton. I seriously question that he even speaks for the members of the FOB, whomever they may be. So, when he complains about the lack of attention to the concerns of the citizens of the area I believe he is talking nonsensical claptrap. The second most prominent opponent claimed to represent a shadow organization that stated their goal was a safe lab. Again, a roster of this organization is not available. Actually this spokesperson is on record calling for closing the entire RML.

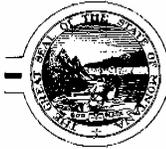
This "organization" has now metamorphosed into a collection of "professional" protestors who have no connection to Hamilton or the surrounding area. I understand the original spokesperson is at this time one a group of plaintiffs suing the Federal Government for multimillion dollars stemming from the fires of 2000. This would seem to raise a question of conflict of interest.

These words about the opponents to the RML are provided because in my experience your bureaucratic remoteness from the Bitterroot Valley may make it very difficult for you to appreciate the dynamics of the area and possibly cause a distortion of your impressions of the true import of the RML opposition. If I have raised some questions check them out yourself.

Earl Pollard
691 Desta St.
Hamilton

DEPARTMENT OF
PUBLIC HEALTH AND HUMAN SERVICES

006



JUDY MARTZ
GOVERNOR

GAIL GRAY, Ed.D.
DIRECTOR

STATE OF MONTANA

www.dphhs.state.mt.us

PO BOX 4210
HELENA, MONTANA 59604-4210
(406) 844-5622
FAX (406) 844-1970

LETTER 6 - GAIL GRAY, MONTANA
DEPARTMENT OF PUBLIC
HEALTH AND HUMAN
SERVICES

January 6, 2004

Valerie Nottingham
National Institutes for Health
B13/2W64 9000 Rockville Pile
Bethesda MD 20892

Re: Public Comment on DEIS for Integrated Laboratory Research Facility

Dear Ms. Nottingham:

On behalf of the Montana Department of Public Health and Human Services (DPHHS), I would like to be on record as supporting the proposed expansion of the Rocky Mountain Laboratories (RML) in Hamilton.

This recommendation comes after consulting with Dr. Michael Spence, State Medical Officer; Dr. Todd Damrow, State Epidemiologist; Mr. Terry Krantz, who is overseeing Montana's preparations for public health disaster and bioterrorism planning; and Mr. Paul Lamphier, State Public Health Laboratory Manager.

We are aware of the contents of the DEIS and find the document adequate to support the proposal to proceed.

It is our intention to enhance our relationship with the Rocky Mountain Laboratories and to partner with them in any way possible as we continue our preparedness efforts that have been intensified the past year and a half. We do envision benefits to Montana and the nation overall in terms of scientific advances, bioterrorism preparedness and response capacity. To further that effort, DPHHS employees will be contacting staff at the Rocky Mountain Laboratories to schedule joint meetings between DPHHS preparedness staff and RML staff.

01-09-04R03:15 RCVD

Valerie Nottingham
Page 2 of 2
January 6, 2004

Overall, we believe the proposed Integrated Research Facility would directly benefit state and national response and preparedness efforts to prevent future outbreaks involving emerging and re-emerging infectious diseases.

Thank you for this opportunity.



Gail Gray, Ed.D.
Director

Montana Department of Public Health and Human Services

cc Dr. Michael Spence
Dr. Todd Damrow
Terry Krantz
Paul Lamphier

LETTER 7 - GILBERT JELINEK

411 So. 2nd St.
Hamilton
Ga. 6

Dear Dr. Bloom -

Thanks very much for publicly pointing out that Jim Olson is spokesman for a small group of people opposed to the proposed level 4 construction program. I am sure that you remember that Olson was also one of the vocal critics of 4-laning Highway 93.

Also, thanks for including me on the list of people receiving the Supplemental E.D.S. I find it very informative and the result of a lot of work.

Here's hoping that it won't be long before the level 4 program gets underway - so that you medical researchers are handed more tools with which to do your work.

Thanks, again -

Gilbert Jelinek

01-09-04P12:08 RCVD

JAN -7 2004

RML Integrated Research Facility

Public Meeting - January 22, 2004

Comments on the Supplemental Draft Environmental Impact Statement

IN FAVOR OF LAB EXPANSION
EIS WAS VERY WELL DONE
OVERALL SAFETY RECORD WAS VERY GOOD

LETTER 8 - DENNIS BARBIAN

Name: DENNIS BARBIAN
Company/Organization: 766 WILLOUGHBY
Address: STEVENSVILLE, MT 59870
City, State, Zip:

Please send comments to: Valerie Nottingham
NIH, B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

Please note that this document will become
part of the administrative record for the EIS
and will be subject to public review.

Comments must be post marked by February 11, 2004

LETTER 9 - L. W. ENQUIST

Nottingham, Valerie (NIH/OD/ORF)

From: Enquist, Lynn [lenquist@molbio.Princeton.EDU]
Sent: Friday, January 23, 2004 9:17 AM
To: ORS RMLEIS (NIH/OD/ORS)
Cc: Enquist, Lynn; Bloom, Marshall (NIH/NIAID)
Subject: BSL4 facility in Hamilton

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ms. Nottingham,

I have read the Supplemental Draft Environmental Impact Statement for the proposed BSL-4 facility at the Rocky Mountain Laboratories in Hamilton, MT.

I am a virologist in the Molecular Biology department at Princeton University. I am the associate chair of the department, the president elect of the American Society for Virology, an author of a popular virology textbook, and the editor in chief of the Journal of Virology. I also am a dedicated fly fisherman who has, many summers over the years, spent many happy hours fly fishing on the Bitterroot River, enjoying the ambience of Hamilton and the Bitterroot valley. I have long time friends in Hamilton and also have a Princeton undergrad from Hamilton in my lab learning basic virology right now.

I worked in two BSL4 facilities in the 1970's , at the NIH campus, (Building 41; where I was then on the research staff) and also at Fort Detrick. In those days, recombinant DNA technology using viruses was done in high containment. Therefore I am familiar with the concept of high containment research and have worked in what were in the mid 1970's, state of the art facilities. It is my judgment that the facility in Hamilton is superior to those old facilities and will be safe for the residents of Hamilton.

I recognize that the world we live in is full of risks and nothing can be guaranteed as risk-free. Indeed, we all must assess relative risks daily and determine when a risk is low or when it is high. In my opinion, the risk of a Hamilton resident encountering an infectious agent from the BSL4 facility is exceedingly low, if not vanishingly small. The scientists who work in the facility will deal directly with infectious agents and the risk to them is also very low as they understand the agents and also are protected by many levels of physical and biological safeguards.

The BSL4 facility in Hamilton is an essential part of our national research effort. The only counter to those who will use science against us is to fight back with research. Knowledge is power, indeed. Research done is this

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RML-Integrated Research Facility FEIS

facility will go far to help us understand how to control natural diseases that plague human-kind like pandemic influenza, SARS, Dengue fever, and West Nile virus. The Hamilton facility will provide essential resources to carry out this specialized research. In addition, this facility will attract new skilled workers and their families to Hamilton who will add to the diversity and energy of a vibrant community.

I appreciate the opportunity to comment on this issue.

Sincerely,

L. W. Enquist, Ph.D.
Professor of Molecular Biology
and Associate Chair

Nottingham, Valerie (NIH/OD/ORF)

From: kevin dohr [ossitadelsol@yahoo.com]
Sent: Friday, January 23, 2004 10:17 AM
To: ORS RMLEIS (NIH/OD/ORF)
Subject: rocky mountain lab expansion

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ms. Nottingham: This e-mail is being written as a comment on the supplemental environmental impact statement for the proposed expansion at Rocky Mountain Laboratories. Although the supplemental environmental impact statement represents a marked improvement over the original one, my opposition to expansion to a high-containment biological lab remains intact. To my way of thinking it is ill-advised to locate a biosafety level 4 lab in a residential neighborhood in Hamilton, Montana. An alternative site was dismissed in the proposal as being too costly but given the risks involved (e.g., on air and water quality and exposing the public to unnecessary danger) and the importance of maintaining a high level of security (which could be more readily achieved by locating the lab away from neighborhoods in a more remote and defensible location) I continue to hold the opinion that an alternative location is the most prudent option. As a resident of the Bitterroot valley I strongly urge you to not proceed with the expansion. I appreciate your time and consideration of my comments. Kevin Dohr, Ph.D.

Kevin Dohr, Ph.D.
 1113 Lance Lane
 Stevensville, MT 59870

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 Yahoo! SiteBuilder - Free web site building tool. Try it!
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10-1

LETTER 10 - KEVIN DOHR

Comment

Response

10-1

The notion that an Integrated Research Facility (IRF) can be remotely placed and remain scientifically productive is incorrect. Science performed off campus is not dependent upon facilities available on campus. Scientific functions are highly interconnected and rely on core support services in order to make progress and ensure regulatory compliance. Specific support functions such as electron microscopy, hazardous materials handling, select agent tracking, secure shipping and receiving, emergency medical response capability, security screening and handling of visitors needs to occur in very close proximity to the facility and cannot be managed off site. Such functions are already present at the RML campus and would not require duplication at a new remote location. Furthermore, the current federal budget did not consider the need to build additional roads, electrical, natural gas and water utility plants and other requirements typically provided by state, municipal or private enterprises. All of these supportive requirements exist at the RML campus and also the NIH Bethesda Campus thereby eliminating the need for duplication which lowers project cost by considerable orders of magnitude. Please also see Section 2.2.2.2.

Nottingham, Valerie (NIH/OD/ORF)

From: Larry Campbell [lcampbell@bitterroot.net]
Sent: Friday, January 23, 2004 1:44 PM
To: ORS RMLEIS (NIH/OD/ORS)
Cc: Larry Campbell
Subject: comments on RML IRF SDEIS
Follow Up Flag: Follow up
Flag Status: Completed

Larry Campbell
Box 204
Darby, MT 59829

To: Valerie Nottingham
NIH, B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

January 23, 2004

RML SDEIS Comments

I appreciate the opportunity, provided by NEPA, to comment on the SDEIS and I especially appreciate the production of an SDEIS to comment on. The decision to supplement the previous sketchy DEIS is commendable and is a demonstration of how the planning of a project can be improved through public involvement.

The analysis and information in this SDEIS is, however, still lacking. More importantly, the entire framework of analysis has been skewed. One of the critical legs of the NEPA process is that the analysis of an action being contemplated includes a range of alternatives. The reason for this is not simply a technical formality. Any informed decision analyzes various action alternatives and possibly combines parts of various alternatives. The purpose and need set out in this document is artificially constrained and tailor made for, and only for, a BSL lab at the existing RML campus in residential Hamilton. Only one action alternative has ever been analyzed. It is a cut and dried plan. Take it or leave it. The decision we are supposedly awaiting has been a foregone conclusion from the beginning. It is clear NIH did not go through the NEPA hoops to choose No Action. NIH apparently went through the NEPA hoops entirely as a formality of informing the public about what they were going to do.

But, I believe NEPA is meant to improve decision making by involving the public, not just a mandate to inform the public about a set plan. Even the informational aspect of the process has been short changed by not analyzing a range of alternatives. Neither we the public, nor apparently the decision maker at NIH know what is being traded off, for example, by choosing not to build a new BSL-4 RML lab at a secured location outside of residential Hamilton. At the last meeting Dr. Deborah Wilson, NIH Director of Safety, agreed with my contention that distance from the community would significantly improve community safety. By not analyzing this alternative we don't know how much that extra community safety would cost or how much community safety could be gained. Or, given this decision-that-was-made-from-the- beginning, how much community safety is being sacrificed to save how much money.

LETTER 11 - LARRY CAMPBELL

Comment

Response

11-1 Please see Section 1.7.1 where this comment is addressed. The project is not 'artificially constrained' but is truly constrained by the allocated funds.

11-2 Please see Section 1.7.1 where this comment is addressed.

11-3 Please see the Community Risk section in section 4.2.1 where community safety is addressed. The risk analysis revealed that there was no health risk from the release of infectious agents at a distance of 300 feet from the exhaust ducts. The actual distance to the community exceeds 300 feet. Therefore, a more remote location would add no further benefit to public health and safety.

Chapter 5 – Response to Comments

There could be advantages over and above improved security and public safety could be bought by the extra cost by starting from scratch in a smarter location, like less noise and traffic problems. Who knows? No other action options were analyzed.

The rationale given for dismissing all options to relocate RML to a less populated area does not mention the importance of resulting improvements to security and community safety.

11-4 { Most of the reasons given for dismissal are not even relevant to some examples of possible alternatives. A BSL 4 lab built downwind, east of town would not require relocation of staff or “necessitate decommissioning and closure of the present RML facility”, as stated in this document. The intellectual synergy of integrated lab work could still continue between the existing lab and the more secure BSL-4 lab down wind outside of town.

11-5 { I have several more specific concerns about the proposed alternative. I haven’t found a discussion about what the result of an explosion might be. This event might have sounded far fetched not long ago. At the last RML informational meeting (12/17/03) Dr. Wilson tried to put the community at ease by saying the heat from an explosion would kill any pathogens. Heat from a significant explosion can be quite local and insignificant. People can live through explosions so I’m sure pathogens could too. Explosive events should be considered in the analysis.

11-6 { I believe prions can withstand an autoclave. If so, the decontamination plans to autoclave animal cages and bedding appear inadequate for work with TSE diseases.

11-7 { I believe prions can withstand an autoclave. If so, the decontamination plans to autoclave animal cages and bedding appear inadequate for work with TSE diseases.

The shipping of pathogens through the US Post Office may be the weakest link in security. I hope nobody ever goes ‘postal’ after taking a package home for a dose of whatever biohazard is in that *clearly marked* package.

11-8 { MPR is not defined in the acronym section but it stands for Maximum Possible Risk even though the model reduces the possible range in distance of escaped pathogens by assuming zero exhaust velocity. Also, I see reference to ‘wind pattern’, but I don’t see any factor in the model for wind speed (p.4-11) Ignoring wind speed would also lessen the range in distance traveled by escaped pathogens The assumptions of zero exhaust velocity and zero wind produce maximized concentrations of pathogens to look at a in worst case scenario. If a disease can be caused by one spore, bacteria, virus or prion, it would seem that the distance that pathogen could travel in a short period of time could be important information. Community quarantine or evacuation planning could benefit from such information.

11-9 { Finally, it is my understanding that a new specialized hospital room is being built in Missoula that is touted as safety mitigation for the proposed project. (Dr. Risi, 12/17/03 RML public meeting) Why not build it in Hamilton? Doesn’t the ambulance ride to Missoula (on Highway 93, no less) unnecessarily increase risk of spreading disease to the community all along the route? Why not build a special room at Marcus Daily Hospital and bring the doctor down from Missoula, if needed? That would seem to increase public safety and benefit the community that is being asked to accept the increased risk

Larry Campbell

2/4/2004

Comment

Response

11-4 Please see the Community Risk section in section 4.2.1 where community safety is addressed. There is no benefit to locating the facility downwind from the community because, based on this risk assessment information, even at the location of the closest residence to proposed RML IRF and under the very worst case scenario the risk of public harm is statistically so minute that it may be considered zero. Therefore, a more remote location would add no further benefit to public health and safety.

11-5 The RML IRF was designed to have set backs from the campus perimeter consistent in meeting blast charge weights drawn from the Interagency Security Committee Guidelines for New Construction, Department of Justice Guidelines and the Department of Defense Unified Facilities Criteria. Most of these documents are in the public domain; however, some portions are considered “security sensitive”. Additionally, analyses were conducted to assess the effect of satchel charges placed at potentially vulnerable locations of the facility to address issues such as progressive collapse and breach of containment. Any areas shown to be vulnerable during these analyses were reinforced, as appropriate, in the facility design. Details of the analyses are considered security sensitive, as it is prudent to keep such detailed vulnerability information from being available to those who might use the information in a manner that would abrogate the intent for which it was produced. A worst-case scenario modeling a percussive explosion would mimic the release described in Scenario I on page 4-11 of SDEIS and FEIS.

[Continued on following page.]

- 11-6** Please see response to comment 11-5.
- 11-7** Prions are subjected to chemical treatment, autoclaving, and if appropriate for the waste type, incineration. Please see page 4-9 and FEIS.
- 11-8** MPR has been added to the list of acronyms and defined in the glossary.

The MPR model does not take into account wind speed. As discussed the SDEIS on page 4-12, the MPR model discounts wind speed and patterns and replaces them with a well defined geometric dispersion model which increases the likelihood that a released particle, or portion thereof, will be identified in a quantitative manner. Addition of wind speed, exhaust velocities, a wind direction, etc. to the model would decrease the worst-case quantification effort because addition of these variables create increased dispersion/dilution of the contaminant.
- 11-9** Emergency plans will be drafted (see Chapter 4). If it is determined that there is a need for specialized care facilities at Marcus Daly or another regional hospital, RML will enter into agreements with relevant providers and entities.

Nottingham, Valerie (NIH/OD/ORF)

From: Sally Rose [Sally.Rose@lee.net]
Sent: Thursday, January 29, 2004 3:00 PM
To: ORS RMLEIS (NIH/OD/ORF)
Subject: biological research laboratory

Attn: Valerie Nottingham

I am VERY opposed to a biological laboratory to study pathogens being built in Hamilton, Montana or anywhere in the United States. Building a laboratory for bioterrorism research is a waste of money badly needed elsewhere and does present a danger to the public. Although Rocky Mountain Labs (or some other lab) may have a good safety record, accidents and unforeseen events do happen.

Sincerely,

Sally Rose
Billings, Mont.

Nottingham, Valerie (NIH/OD/ORF)

From: Brian Bachman [bachmanbrian@hotmail.com]
Sent: Friday, January 30, 2004 9:01 PM
To: ORS RMLEIS (NIH/OD/ORF)
Subject: Rocky Mountain Lab Expansion

Dear Ms. Nottingham;

Attached is a letter to Marshall Bloom that outlines two suggestions I have after reading the full supplement to the EIS for the proposed expansion of RML. As a resident of the community, I feel very comfortable with and fully support the expansion. I appreciate the confidence that has been shown to the Rocky Mountain Labs as evidenced by this commitment.

If you have any questions, please feel free to contact me.

Sincerely,

Brian R Bachman
406-363-0123 MT home
206-715-2341 cell

Scope out the new MSN Plus Internet Software – optimizes dial-up to the max!
<http://join.msn.com/?pgmarket=en-us&page=byoa/plus&ST=1>

LETTER 12 - SALLY ROSE

LETTER 13 - BRIAN BACHMAN

No letter was attached.

Nottingham, Valerie (NIH/OD/ORF)

From: LLittlelouie@aol.com
Sent: Tuesday, February 03, 2004 9:38 PM
To: ORS RMLEIS (NIH/OD/ORS)
Subject: Lab proposal

To Valerie Nottingham,

As a teacher, long time resident of Montana and well informed member of the voting public, I submit this letter in strong opposition to the proposed lab upgrade in Hamilton, Montana. We will not win the war on terrorism or even put up a good fight by exposing our citizens and anyone else to this UN-godlike material.

Laurie Leonard
2734 S 7th St. W
Missoula, MT 59804

LETTER 14 - LAURIE LEONARD



Your Community Family Health Choice
111 Main Street
Hamilton, MT 59840
Phone: (406) 961-3611 • Fax: (406) 963-0131
E-mail: info@bluerootdrug.com

LETTER 15 - WAYNE A. HEDMAN

February 4, 2004

National Institutes of Health
903 South 4th St.
Hamilton, MT 59840

RE: Expansion Project

To Whom It May Concern:

This is a letter in support of your expansion project. I appreciate that you have held numerous public meetings and gathered comments from concerned citizens prior to making your decision to continue with the project.

I have all the confidence that you will continue to run an efficient and safe facility.

Sincerely,

WAYNE A. HEDMAN
RPh/Owner

Cc: Marshall Bloom

02-04 10:51:04 AM



MONTANA HISTORICAL SOCIETY

225 North Roberts ♦ P.O. Box 201201 ♦ Helena, MT 59620-1201
♦ (406) 444-2694 ♦ FAX (406) 444-2696 ♦ www.montanahistoricalsociety.org ♦

January 14, 2004

Valerie Nottingham
NIH, B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

Ref: Rocky Mountain Labs Supplemental Draft EIS, December 2003

Dear Ms. Nottingham:

We've reviewed the above referenced document you submitted to us and have no comments on the Integrated Research Facility's (IRF) affect on the RML Historic District. Also, we believe that the increased employee traffic that will come with the completed IRF will not have a significant impact on the Hamilton Historic District.

Sincerely,

Pete Brown
Historic Architecture Specialist
Montana SHPO
(406) 444-7718

File: NIH-USDHHS/Hamilton/2003122605-3001

01-23-04A09:19 RCVD

*LETTER 16 - PETE BROWN, MONTANA
HISTORICAL SOCIETY*



STATE HISTORIC PRESERVATION OFFICE ♦ 1410 8th Ave ♦ P.O. Box 201202 ♦ Helena, MT 59620-1202
♦ (406) 444-7715 ♦ FAX (406) 444-6575

LETTER 17 - TY R. CAPELLE

TO: STEPHEN A. FICCA

1/15/2004

DEAR MR. FICCA,
THANK YOU FOR COMPLETING THE SUPPLEMENTAL DRAFT EIS FOR THE
ROCKY MOUNTAIN LABORATORIES IN HAMILTON, MT. I AM SURE THAT IT TOOK
CONSIDERABLE TIME AND MONEY TO DO THIS. HOWEVER, YOU TOLD US
NOTHING NEW. IT ONLY REITERATES ONCE AGAIN THAT MORE IS NOT BETTER.

THE BOTTOM LINE IS THAT YOU INTEND TO BUILD AN UGLY, NOISY AND
POTENTIALLY DANGEROUS FACILITY IN THE MISTS OF A BEAUTIFUL, QUIET
AND HISTORICAL RESIDENTIAL AREA. THIS IS A MISTAKE.

PLEASE RECONSIDER. IT'S NEVER TOO LATE TO DO THE RIGHT THING.

THANK YOU,
TY R. CAPELLE
714 S. 2ND ST.
HAMILTON, MT. 59840



Rec'd 1/23/04


LETTER 18 - PARNELLI SHARP

E. Parnelli Sharp
537 Hudson Lane
Victor, MT 59875
406-961-1705
ParnelliS@aol.com

01-29-04P02:35 RCV0

January 24, 2004

Valerie Nottingham
NIH, B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

Dear Ms. Nottingham,

I am writing this in reference to the open comment period for the SDEIS for the Rocky Mountain Lab Expansion proposal in Hamilton, MT. I am in support of the expansion but have several comments regarding the process.

I am a resident of Victor, MT. This is a small community (less than 600 people) approximately 7 miles north of Hamilton. I am a new to the area, but have had information on this proposed project from long-time residents in Hamilton and Victor. These residents have had somewhat negative opinions about this upgrade to the lab. Once a resident (June 28, 2003), I became very involved through attending the Community Liaison Meetings as an observer. I must admit that the comments from my friends pressed me into finding out more about the lab and the controversy about this expansion. I could not understand why such educated people would be against this opportunity for research to take place in the community. I am not a scientist, nor a researcher. I am a retired educational administrator and consider myself an educated person with an understanding that research is not a pure science; it is a process with experiments and flaws. I have formulated my own opinions and thank you for the opportunity in this comment period to express them.

There is always a problem with change. People don't like it. It is the challenge of the change agent to facilitate the change process. In my opinion as an observer for the past 8 months, the proposed change to move RML from a level 3 lab to a level 4 lab has had its holes, oops, and oversights associated with it. I'm not sure if these can be rectified in the minds of many of the local residents. They have looked to the educated, scientific leaders for structure and direction within the Environmental Impact Study (EIS). They did not find that and are frustrated to the point of not supporting the project. Perhaps better understanding of the purpose of an EIS would have been beneficial. Certainly, ironing out some of what I call the holes, oops, and oversights would have helped. Let me provide specifics for my opinion.

First, let me address what I term - the holes. As stated many times (SDEIS p. 2-1 and throughout), "NIH proposes to construct an Integrated Research Facility to house Biosafety Level (BSL)-2, BSL-3, and BSL-4 laboratories, animal research facilities, administrative support offices, conference rooms, and break areas at the RML Facility in Hamilton, Montana." This statement already sends red flags up to people. Many residents of the community consider this a "done deal". It has already been decided by the government to put this in here at the Hamilton facility. They did not feel that alternatives to Hamilton, MT were considered. It might have been more accepted if the proposed action had been stated, "to provide a highly contained and secure intramural lab at a location in the northwest United States." Then to consider alternatives and zero in on RML because it is the best alternative. But the perception is that this is something forced upon the residents with no alternatives considered.

Secondly, the "oops". In the best attempt of the Associate Director, Dr. Marshall Bloom, to establish a Community Liason Committee (SDEIS, p. 2-11), it is perceived by some residents that the members of the committee are selected individuals "chosen" to support this expansion of the lab. These selected few have

Comment

Response

18-1

Please see response to comment 10-1.

18-1 {

Chapter 5 – Response to Comments

no structured role or procedure for sharing information presented/discussed at the meetings back to their respective representative group, nor do most of them bring questions forward. No public comment is accepted at the meeting. So, many local residents are wary of what the group represents. Public outreach is essential. A publicized web page and/or newsletter with updated information, specific Community Liaison Meeting agendas and minutes need to be available (The tapes of the sessions are good but, not all residents can get to the library.), and local email contacts listed. Regularly scheduled informal, neighborhood chat sessions would provide neighbors with opportunities to have their opinions voiced and a forum for open communication.

18-2 { Third.....the oversights. Many have responded that there are several items not addressed in the SDEIS. I can only comment on the one most glaring to me - local, emergency services. There is no emergency plan included in the document and no dedicated, federal dollars to enhance the mostly community, VOLUNTEER emergency personnel. It is stated that certain procedures will be written if and when the project is approved but no assurances are provided for the community. It is essential that assurances such as a timeline as to when the community should expect these components to materialize must be included in the final EIS to be considered by this community. Most of the fire services in Hamilton and surrounding communities are volunteer people. The medical care in Hamilton and other local communities is very small. Medical facilities are limited. There must be dedicated, federal dollars to come with this project to have more personnel hired specifically to expanding these services. Planners of this proposed expansion project and these documents must have overlooked that for 3-4 months out of the year local fire and medical services in Montana are busy with other emergencies (forest fires). Having collaboration with these services during these local emergencies would be disastrous if they were needed to help at RML. More than a memorandum of understanding with local emergency services and hospitals (SDEIS, p. 2-17) is needed. For the record, there is only one local, Hamilton hospital. This critical aspect of dedicated emergency personnel cannot be overlooked in a final EIS. These resources must be expanded.

Dr. Marshall Bloom has conducted himself in the most professional manner considering the governmental circumstances under which he has had to present himself. It is my opinion that the events related to the Environmental Impact Studies for this project have been a classic case of the cart going before the horse. I really want to see a level 4 lab in this community. But, it is essential that it is well thought out, planned in collaboration with the community, and has the needs and concerns of the residents within the mile radius of the lab addressed before any approval is given to this project.

18-3 { In closing, I want to return to my observations of many residents of this local area. These residents looked to experienced researchers and scientists to provide the knowledge and structure for this proposed project. They have been shown a poor initial EIS, a project that is perceived as a done-deal, and a SDEIS that still overlooks many of the impacts that such a project will have on this small town and surrounding communities. You must address better community outreach and involvement, and expanded emergency resources to assure a quality, safe, accepted lab expansion in Hamilton, MT.

Thank you for this opportunity to comment on this proposed project.

Sincerely,


E. Parnelli Sharp

Cc: Dr. Marshall Bloom, RML Associate Director

Comment

Response

18-2 Please see Section 1.7.2 where this comment is addressed.

18-3 Please see Section 1.7.2 where this comment was addressed. Please see description of *Neighborhood Meetings*, which was included in Chapter 2 of the DEIS, SDEIS and is included in the FEIS.

5-26
RML-Integrated Research Facility FEIS

LETTER 19 - GOVERNOR JUDY MARTZ

OFFICE OF THE GOVERNOR

STATE OF MONTANA

JUDY MARTZ
GOVERNOR



STATE CAPITOL
PO Box 200801
HELENA, MONTANA 59620-0801

January 26, 2004

Valerie Nottingham
National Institutes of Health
B13/2W64 9000 Rockville Pike
Bethesda, MD 20892

02-02-04P03:24 RCVD

RE: Public Comment on DEIS for Integrated Research Facility

Dear Ms. Nottingham:

I am aware that a supplemental draft EIS was issued in late December, 2003 and thus want to, with this letter, renew my support for the Integrated Research Facility (IRF) project at the Rocky Mountain Laboratories (RML) in Hamilton. I believe that this project is based on sound scientific design and rationale, and the project has emerged as a scientific biodefense necessity in our post 9-11 world.

Members of my staff and I have toured the RML campus to discuss the expansion project, see the work being done in these facilities and meet the employees.

My staff and I have also met with representatives from the Department of Public Health and Human Services (DPHHS) regarding the RML project, and we envision an enhanced working relationship between these two entities as a result of the IRF.

These informational meetings, my knowledge of RML's work and safety record, and widespread support from medical professionals in the vicinity have left me certain that proceeding with the IRF is the right thing to do. Montana is fortunate to have a facility of this caliber. RML is clearly doing research on par with the best infectious disease research laboratories in the nation, and the facilities are already world class. My administration hopes to develop a greater working relationship with the experts and resources at RML.

Historically, RML has been a good partner with DPHHS on projects involving microbial pathogens and communicable disease. In fact, DPHHS presently is collaborating with RML on a tick research project regarding a potentially new vector borne illness. We are

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Chapter 5 – Response to Comments

Valerie Nottingham
January 26, 2004
Page 2

also aware of an established working relationship between RML and the Ravalli County Health Department on its public health disaster planning efforts.

While the RML biosafety level 4 research facility would not likely lend itself to any new state project partnerships, my administration does see benefits to Montana and the nation overall in terms of scientific advances, bioterrorism preparedness and response capacity.

19-1

Leaders at the state public health laboratory, who are preparing to upgrade to BSL-3 status, realize the primary mission of RML is research and not service testing. Still, the state is interested in exploring a formal working relationship with RML in terms of a backup and consultative capacity in the event of a public health crisis.

Further, state government also hopes to rely on expertise from RML researchers in terms of consultations and advising on projects. We are aware that in addition to interactions with scientists and students from the Montana university system, RML also counts among its regular visitors some of the world's leading scientists, such as:

- Dr. Stanley Falkow of Stanford University, recognized as one of the foremost authorities in the world of infectious diseases, and his wife, Dr., Lucy Tompkins, who is an infectious disease specialist at Stanford Medical School. Dr. Falkow spends much of his summer at RML interacting with staff and students, and has conducted research at RML.
- Noble Prize winner Dr. David Baltimore, president of the California Institute of Technology.
- Stanford University professor Dr. Irving Weissman, originally from Great Falls, who is a world-respected authority on stem cells.
- Dr. Leroy Hood, a Montana native, who runs the Institute for Systems Biology in Seattle.

With this level of science-based support for continued work at RML, and our state's desire for a long-term working relationship with RML, I encourage the IRF project to proceed as planned.

Sincerely,



JUDY MARTZ
Governor

Comment

Response

19-1

Further discussions between the State and RML will occur regardless of the alternative selected.

5-28
RML-Integrated Research Facility FEIS

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EXECUTIVE OFFICES

January 22, 2004

Ms. Valerie Nottingham
National Institutes of Health
B13/2W64
9000 Rockville Pike
Bethesda, MD 20892

Comment to: Supplemental Draft Environmental Impact Statement
RML Integrated Research Facility

Dear Ms. Nottingham:

I am writing in support of the construction of the integrated research facility that has been proposed for the campus of the Rocky Mountain Laboratories located in Hamilton, Montana.

Rocky Mountain Laboratories proposed facility will be the premiere research facility of its kind in the world when completed. It will be an economic boon to the area and may serve as a magnet for other private research facilities. The potential benefits to the local medical community are enormous, as part of the proposal is the education of local health care providers on the management of potentially exposed individuals and the upgrading of local hospitals to accommodate such persons were an exposure to occur. This type of training and facility upgrades will greatly assist St. Patrick Hospital and Health Sciences Center in our ability to prepare for disasters, infectious diseases, and potential biologic attacks on our community.

The Environmental Impact Statements have more than adequately, in our assessment, evaluated the overall impacts on the community of the construction of the facility. We concur with its conclusions and encourage the final report to continue to consider the proposed construction as the preferred alternative.

Sincerely,

A handwritten signature in black ink that reads 'Steven Witz'.

Steven M. Witz, Ph.D.
President and CEO

SMW:seh

LETTER 20 - STEVEN WITZ, ST. PATRICK
HOSPITAL

02-02-04P03:24 RCV0