

Mark Maloney  
Boston Redevelopment Authority  
One City Hall Square  
Boston, MA 02201

Dear Mr. Maloney:

We, the Worcester Square Area Neighborhood Association, are writing in regards to the environmental impact review process for the Biosquare Phase II project, which includes the Level 4 biolaboratory. As you are aware, this neighborhood is most directly impacted by this project as it will be taking place in the confines of our association.

Conceptually, the WSANA is very supportive of the growth of biomedical research at Boston University Medical Center. However, we are very concerned about the expansion of the research to include Level 4 agents as an agent release in a dense urban neighborhood, whether accidental or purposeful, poses significantly more risk to us than existing Level 3 research. We are primarily concerned about our life and health, but as direct abutters, we must also consider the impact on our property values of any incident. While the chance is obviously very small, no one, not even Dr. Klempner, can or will say there is no risk. If September 11<sup>th</sup> taught us anything, it is to never say, "It can't happen here."

As a neighborhood, we have attempted to learn more about the proposed research and risk mitigation plans by having members attend nearly every public meeting and review all released documentation. In addition, in July 2004, we requested:

- copies of documents from the proponent outlining evacuation plans in case of a agent release; specific details on transportation plans for Level 4 agents; and plans for insuring the medical center and surrounding environs for destruction or devaluation of property due to an accident or incident
- specific funding to hire an independent consultant to evaluate the environmental impact documents and help us understand the risks associated with agent release and evaluate BU's plans to mitigate these risks.
- funding for members of the biolab subcommittee to visit other Level 4 facilities to understand their risk mitigation plans and meet with neighboring communities to discuss their experiences as direct neighbors to the lab.

Our goal was to take an informed vote and provide a detailed response to the Environmental Impact documents. We would have had detailed understanding of the risks, the risk mitigation plans and would have been able to weigh those against the benefits of doing this research and why it is critical to do it in this location.

However, the proponent did not respond to our requests and as of today, still has not provided requested information. With the support of the BRA, in mid-October, we

were authorized to hire expert help to review the documents, but the proponent was unwilling to move back the filing date of November 8<sup>th</sup>. While we are very grateful to the BRA for supporting us in this way and are moving forward with hiring experts to support our evaluation of the EIS and other information, it is impossible to conduct and share that research before this letter needs to be submitted.

Therefore, as of today, the WSANA finds itself in nearly the same situation as July in terms of having access to detailed risk assessment and mitigation plans. As a result, the WSANA voted nearly unanimously (93%) to oppose this specific project at this time—and would strongly encourage the BRA to do so as well—for the following reasons.

1. The proponent has failed to share the results of scenario analyses (TRA) that model the impact on neighboring life and property of a terrorist or other malevolent incident at the Level 4 lab, citing confidentiality. We believe that these analyses are critical for the community to review and understand prior to approval.
2. The proponent has failed to work with city agencies [or if they have, they have failed to share the information] to detail the specifics for how they would handle an evacuation or quarantine in case of an accidental or purposeful Level 4 agent release, and we do not believe the existing Level 3 plans would be adequate. We believe this process and resulting plans are critical to an environmental impact review process and approval should require this process to have been undertaken.
3. We believe the security plans that have been discussed are thoroughly inadequate for a facility of this type and while they may conform to regulations, they do not incorporate the heightened risk of doing this research in a busy, urban center and the heightened terror risk that we live under today. We believe approval should be contingent upon a benchmarking process to ensure that the security measures, in particular those outside the facility like armed guards, etc, conform to those in place at all the existing Level 4 facilities and with the revised terror alert guidelines.
4. The proponent dismisses the option of locating the lab in a more industrial or remote location in the city of Boston, citing increased cost and the drawback of not having principal investigators in the same facility. We are not convinced that “convenience” is an adequate reason to increase the risk to the citizens of Boston and the results of the cost/benefit have not been shared. We would strongly encourage the BRA to require the proponent to provide benefit/cost analysis of locating this facility at the existing BU campus versus locating it at a more industrial or remote location in the city.
5. The proponent has failed to outline how they would compensate property owners in case of an incident that destroys, makes unlivable, or negatively harms property values. Even if every homeowner bought terrorism insurance, we have

learned that an incident at BU with the lab would NOT be covered. Therefore, we believe the proponent must outline for the city how they would handle a devastating incident prior to receiving city approval.

Finally, we also want to note for the record our grave concerns about how Boston University is handling the process of developing this lab. Since our request in July, we have found the proponent to be unwilling and/or unable to answer many seemingly basic requests for information and it is our understanding that we are not alone in this assessment.

We believe this either indicates a lack of clear leadership and accountability on the project, severe disorganization, or a fear that sharing requested information will highlight their lack of planning or the real risks that exist. For a project of this magnitude and with the potential, however small, of this type of disaster, we would expect significantly better performance to date from Boston University. We believe that some of our concerns are only heightened by this lack of transparency and clarity and can not believe that the city has received the information required to approve the project at this time. Therefore, we would also strongly encourage the BRA to withhold approval for this project until Boston University can prove that they are better able to be open, decisive, responsive, and effective in making needed information available to the city and the impacted communities.

Sincerely,

Susan Hunt Stevens  
President  
Worcester Square Area Neighborhood Association