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RE: ***ARE GAO REPORTS SUPPOSED TO SUPPORT POLITICAL AGENDAS?***

Dear Mr. Dodaro:

Over the years, the Government Accountability Office (GAO) has provided unbiased, apolitical analytical services to Congress. It creates serious concern then, when a GAO examiner generates distorted, misleading products instead ... products that seem to shill for not-so-hidden agendas.

The foundation for this trepidation is a recently published GAO report, "Biological Research: Observations on DHS's Analyses Concerning Whether FMD Research Can Be Done as Safely on the Mainland as on Plum Island" (GAO-090747). And, yes, this is the same report that was leaked to the *Washington Post* early ("Infectious Diseases Study Site Questioned: Kansas Location May Not Be Safe," Carol D. Leonnig, *Washington Post*, July 27, 2009).

My first 10-minute scan of this 61-page document resulted in two immediate observations: (1) multiple jump-off-the-page errors in summary Table 6, DHS's Site Rankings, Risk Rating, and Evaluation Criteria; and (2) the absence of the 29-page DHS response to GAO's draft report; it was not appended.

The DHS selection of a site on the Kansas State University campus as the best location for the National Bio and Agro-defense Facility (NBAF) was the genesis for this particular GAO analysis. As a result, we are very familiar with the DHS selection parameters. Six finalist locations were compared with regard to six criteria, and Table 6 in the GAO report appeared to reproduce a DHS summary we received last December. However, multiple results listed for the sites were wrong when the report first appeared on the GAO website July 30, 2009.

Moreover, it seemed wholly inappropriate that Appendix II in the GAO report entitled, "Comments from the Department of Homeland Security" included only the 2-page cover letter from DHS without the 29-page "general and specific comments and corrections" attached to it. Absent the attachment, there are, in fact, no "Comments from the Department of Homeland Security" included.

Staff in Kansas Senator Pat Roberts' office called the GAO directly and later that day adjustments were made to the table; most of the mistakes were corrected. However, the 29 pages of comments and corrections DHS had submitted were still not appended.

Additionally, something wasn't right yet with the table. In comparing chart headings in the DHS Preferred Alternative Selection Memorandum of December 4, 2008 to Table 6 in the GAO report, "safety" in the latter had replaced "environmental impacts" in the former and, inexplicably, New York was now advantaged somehow instead of Georgia being disadvantaged.

The comprehensive environmental risk assessment conducted for DHS by independent contractors indicated that building NBAF at the Georgia site could have "moderate environmental impacts" while "no to minor environmental impacts" were projected at the other five sites. These findings were recapped in the chart in the DHS memo.

GAO Table 6, on the other hand, lists all sites as “moderate” for safety risk except New York–Plum Island which is “low.” The GAO report further states: “Overall risk rank shows that Plum Island is generally at a low level of risk in terms of safety while the other sites are at moderate levels.”

So, Georgia was disadvantaged by the DHS in-depth scientific environmental study which indicated it might be slightly less safe. Plum Island was advantaged by the GAO perfunctory editorial review which suggested it was safer than the other five sites.

How is that possible? And why would the GAO auditor change one DHS selection criteria in the table when every other finding and the ultimate rankings of the sites were all the same?

Remarkably, the answer appears to be so the examiner could compare apples to oranges without disclosing that fact ... which wasn’t easy to figure out.

One paragraph in the two volume, thousands of pages long *NBAF Final Environmental Impact Statement* provided the answer. By considering Plum Island a “No Action Alternative” (doing nothing to protect the country against the plethora of foreign animal and zoonotic – animal to people – disease threats that can’t be studied at Plum Island) and comparing it to the five down-selected finalists as sites to build NBAF (doing something to protect the country), Plum Island comes out as the “environmentally preferable alternative” (page 2-52), i.e., the Plum Island risk in this context is low; the other sites are all moderate by comparison.

Plum Island was also examined as a potential site to build NBAF, but that was not the context the GAO examiner chose to use. Comparing apples to apples wouldn’t allow the same conclusion.

Consequently, what appeared at first glance to be merely inaccurate, hurried work and accidental omissions/substitutions may be indicative of something more purposeful. Plus, there are way too many other examples in the GAO report that could be construed as “gaming” the outcome to not believe it’s agenda driven somehow.

Such games threaten America’s national security. Not building NBAF puts the county at significantly greater risk than building NBAF. Emerging diseases are on the horizon; some like H1N1 are already here. NBAF will help protect the nation from diseases that threaten both animal health and public health. As a result, it’s time to stop playing games and get NBAF built.

Sincerely,



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Thomas V. Thornton
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RWT/rt

cc:	Senator Sam Brownback	Governor Mark Parkinson	KSU President Kirk Schulz
	Senator Pat Roberts	Lt. Governor Troy Findley	KBA Board
	Representative Lynn Jenkins	Senator Stephen Morris	HBAC Task Force
	Representative Dennis Moore	Senator Anthony Hensley	HBAC Members
	Representative Jerry Moran	Representative Michael O’Neal	
	Representative Todd Tiahrt	Representative Paul Davis	
		Senator Jay Emler	
		Representative Kevin Yoder	