

Bearden, Karen

Page 1 of 1

WD0122

From: Karen Bearden [REDACTED]
Sent: Tuesday, July 29, 2008 4:49 PM
To: NBAFProgramManager
Subject: NO to NBAF in Butner!

Hi,

1| 25.3 | I'm writing to encourage you not to locate the NBAF lab in Butner, NC.
 2| 12.3 | The environmental impacts are too high, with abundant wastewater used
 3| 9.3 | (we're already in a drought!!!). There will also be increased air
 4| 17.3 | emissions and pollution from added traffic and carcass disposal. And the
 5| 18.3 | risk of something being accidentally released is scary.
 6| 21.3 |

Please don't locate the lab in Butner!! Thanks.

Peace, Karen Bearden
 [REDACTED] NC

Comment No: 1 Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 12.3

DHS notes the commentor's concern regarding the proposed water use and existing water supply. Section 3.3 includes an evaluation of infrastructure including potable water, and Section 3.7 includes an evaluation of water resources. As stated in Section 3.3.7.3.1, there is adequate capacity of 39,500,000 gallons per year, but some infrastructure improvements would be required. DHS acknowledges that drought conditions exist in the region, but the NBAF would only account for a minor increase in water use compared to recent development trends.

Comment No: 3 Issue Code: 9.3

The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from traffic and incineration. Site-specific effects at the Umstead Research Farm Site are discussed in Section 3.4.7. Air emissions were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF does not significantly affect the region's ability to meet air quality standards.

Comment No: 4 Issue Code: 17.3

DHS notes the commentor's concern. A discussion of existing road conditions and potential effects to traffic and transportation from the construction and operation of the NBAF at the Umstead Research Farm Site Alternative is located in Section 3.11.7 of the NBAF EIS, which has been revised to incorporate revised data. Based on the revised analysis, traffic associated with NBAF operations would increase the average daily traffic volume on Range Road by approximately 2.6% and on Old Route 75 by approximately 0.2%. Thus, the increase in traffic from the NBAF would be minor.

Comment No: 5 Issue Code: 18.3

DHS notes the commentor's concern. Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As discussed in this section, the final design for the NBAF will probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4. of the EIS (Air Quality) assumes that the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse effect. Similarly, because alkaline

hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 of the EIS (Infrastructure) assumes that alkaline hydrolysis (performed in a tissue digester) will be used to assess the maximum sanitary sewage impacts.

Any technology used to dispose of carcasses and pathological waste would have to be built and operated in accordance with federal, state and local regulations as well as permit requirements. These regulations and permit requirements would specify emissions limits, monitoring, and reporting requirements as appropriate. The public would have an opportunity to review and comment on proposed emissions limits, and monitoring requirements as part of the permitting process.

Comment No: 6

Issue Code: 21.3

DHS notes the commentor's concern regarding the potential release of a pathogen from an NBAF accident. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

Beavin, Susan

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FROM : E & J Beavin FAX NO. : 2106956627 Aug. 25 2008 06:09PM P1
FD0086

HCPA
Hill Country Planning Association
PO Box 470
Helotes, Texas 78023

"We have not inherited the earth from our fathers, we are borrowing it from our children"

August 25, 2008

U.S. Department of Homeland Security
Science and Technology Directorate
James V. Johnson
Mail Stop #2100
245 Murray Lane, SW
Building 410
Washington, DC 20528

FAX: 1-866-508-NBAF (6223)

Dear Sirs,
The Hill Country Planning Association represents organizations and individuals of the Texas Hill Country. We enclose a copy of our Citizens Master Plan, May 2007 which has been endorsed by representative groups to the region.

We are concerned about the effects which the proposed US Dept. of Homeland Security's National Bio and Agro-Defense Facility (NBAF) at the Texas Research Park would have on the land, water, air and economy of the Texas Hill Country.

Contrary to the assurance of Texas Research Park boosters, our area experiences tornados, hurricanes, earthquakes, flooding and ice storms. The Texas Research Park is vulnerable to these events, too. This is easily verifiable through the regional weather bureau. How would these affect the structures, containment of an accident at the Texas Research Park or on a transportation corridor to or from the Texas Research Park?

What is the proposed transportation corridor to serve for transporting the NBAF disease agents to/from the lab(s) at the Texas Research Park? State highway 211 (SH211) has, for 20 years, been touted as the panacea of the Texas Research Park and the hazardous materials route around San Antonio. It was built for the Research Park and for its boosters and goes over the Edwards Aquifer, the Edwards Aquifer Recharge Zone and is proposed to go over the Edwards Aquifer-Trinity Aquifer Contributing Zone. We were told at the 8-7-08 NBAF hearing in San Antonio that the Edwards Aquifer is not in any danger of contamination from an accident at the proposed Texas Research Park site. From State highway 90 the Texas Research Park is reached by SH211 which then continues northward to SH 16. This route goes directly over the Edwards Aquifer and the Edwards Aquifer Recharge Zone and crosses the *federally protected* "Government Canyon Karst Fauna Region". SH211 has been proposed to continue over the Edwards Aquifer Contributing Zone and Trinity Aquifer to IH10. This leg has been under contention for twenty years because it would

Member Organizations
Friends of Historic Doerns Stage Road
Greater Edwards Aquifer Alliance (GEAA)
Grey Forest Historical Society
Helotes Heritage Association
Helotes Nature Center
Jedina County Environmental Action Association
Northwest Bear Supper Club
Old Spanish Trail - 100
San Geronimo Valley Alliance
San Geronimo Nature Center
Sonic Loop-Boerne Stage Alliance
The City of Grey Forest
Valentine Ranch

1) 12.6 San Geronimo Nature Center
2) 9.6 Sonic Loop-Boerne Stage Alliance
3) 15.6 The City of Grey Forest

4) 21.6
5) 11.6

6) 17.6

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1 cont. | 12.6

Comment No: 1 Issue Code: 12.6

DHS notes the commentor's groundwater concerns. The NBAF EIS Section 3.7.8.1.3 describes the Texas Research Park Site alternative's local aquifers including the Edwards. Sections 3.7.8.2.3 and 3.7.8.3.3 describes the proposed NBAF's potential construction and operational consequences on the local aquifers.

Comment No: 2 Issue Code: 9.6

DHS notes the commentor's concerns regarding impacts on the air quality of the Texas Hill Country. The potential effects of NBAF construction and operations on air quality are discussed in the NBAF EIS Section 3.4. Site-specific effects at the Texas Research Park Site are discussed in Section 3.4.8. Air pollutant concentrations were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF does not significantly affect the region's ability to meet air quality standards.

Comment No: 3 Issue Code: 15.6

DHS notes the commentor's concern. Section 3.10.8 discusses the economic effects of the Texas Research Park Site Alternative to the surrounding community. The potential economic effects of an accidental release are discussed in Section 3.10.9 and Appendix D of the NBAF EIS. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the economic effect would be significant for all sites. To the extent possible, the NBAF EIS identifies differences in the magnitude of potential adverse impacts among the candidate sites if an accidental release of a pathogen were to occur. DHS has identified its Preferred Alternative in Section 2.6, which was based on a multitude of factors of which the safety of the human and physical environment and the protection of the U.S. livestock sector are paramount. A Record of Decision that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

Comment No: 4 Issue Code: 21.6

DHS notes the commentor's concern regarding potential weather impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin

would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and consequences of those accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

Comment No: 5

Issue Code: 11.6

DHS notes the commenter's concerns regarding earthquakes. Section 3.6.1 of the NBAF EIS describes the methodology used to assess each site's potential seismic consequences, and Section 3.6.8 specifically describes the Texas Research Park Site. The NBAF would be built to meet or exceed all applicable building codes for seismic safety. Section 3.14.3.2 further addresses NBAF design criteria and accident scenarios associated with natural phenomena events such as earthquakes, floods, tornadoes, lightning, high winds, and hurricanes. These potential natural phenomena effects were combined into a single bounding accident analysis. DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary

structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 6

Issue Code: 17.6

DHS notes the commentor's concerns regarding transportation of pathogens. A discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS, and Section 3.14, Health and Safety, includes an analysis of accidental releases during transportation. A discussion of the existing road conditions and potential effects to traffic and transportation from the Texas Research Park Site Alternative as provided in Section 3.11.8 of the NBAF EIS. With regard to the shipment of pathogens, no specific transportation corridors have been evaluated. Should a decision be made to build NBAF and a site selected, transportation routes would be identified in accordance with a standard shipment procedure with the route optimized for safety and security.

Beavin, Susan

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FRCM : S & J Beavin FAX NO. : 2106956627 Aug. 25 2006 06:05PM P2 FD0086

HCPA
Hill Country Planning Association
 PO Box 470
 Helotes, Texas 78023

"We have not inherited the earth from our fathers, we are borrowing it from our children"

Page 2

endanger the region's sources of drinking water. Also, major populations of Federally Listed Endangered Species, Golden-cheeked Warblers and Black-capped Vireos are documented in this area. Texas Dept. of Transportation has said it does not have adequate funds to complete SH211 but representatives of the Texas Research Park inferred that the Dept. of Homeland Security does have funds to do so.

In addition:
 How many gallons of water will be required per year for the lab(s)? In times of severe droughts what procedure will be in place to provide adequate water when there are water restrictions?
 Do the labs "require"/use wastewater? How many gallons of wastewater will be required per year for the lab(s)? In times of severe droughts what procedure will be in place to provide adequate water when there are water restrictions?
 How many gallons of wastewater will be generated per year by the lab(s) and what provision is proposed and/or available to handle this wastewater?
 What size of filter is required to ensure filtering of contaminated wastewater to safe levels and will this be required at the proposed Texas Research Park labs? Will this treated wastewater go into the region's rivers and creeks?

Please explain the rationale for locating the lab(s) on the west side of SA which is closely surrounded on three sides by agricultural (farming and ranching) and hunting enterprises. Please explain the justification for endangering the livestock and hunting enterprises of Texas, Oklahoma, New Mexico and the country of Mexico. A release of disease agents from NBAF at the Texas Research Park would reach the above states and Mexico in a short time and devastate the economy. Wildlife, including deer and feral hogs, are plentiful in the Texas Research Park area. Please ask if outside cattle are able to breach the fencing system around the Texas Research Park.

How safe are we from the effects of a utility power loss or accident at the Texas Research Park NBAF facility? Serious questions have recently arisen concerning the local utility company.

Thank you and we look forward to receiving answers to the above questions and we would appreciate also receiving a list of all speakers at these hearings mailed to HCPA, PO Box 470, Helotes, TX 78023.

Sincerely,

The Hill Country Planning Association Board
(faxed by Susan Beavin, Sec.)

Member Organizations 7| 13.6
 Friends of Historic Boerne Stage Road
 Greater Edwards Aquifer Alliance (GEAA)
 Jay Forest Historical Society
 Helotes Heritage Association
 Helotes Nature Center 8| 12.6
 Kofia County Environmental Action Association
 Northwest Boerz Support Club
 Old Spanish Trail - 100
 San Gerónimo Valley Alliance 9| 18.6
 San Gerónimo Nature Center 10| 18.6
 San Leon-Socorro Stage Alliance 11| 18.6
 The City of Grey Forest
 Rubintone Ranch 12| 23
 3 cont. | 15.6
 13| 23

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Comment No: 7 Issue Code: 13.6

DHS notes the commentors concern regarding golden-cheeked warblers and black-capped vireos at the Texas Research Park Site. As described in Section 3.8.8.1.5 of the NBAF EIS, an endangered species survey and potential habitat evaluation was conducted for the NBAF site. This survey determined that no suitable habitat for golden-cheeked warblers and black-capped vireos occurs at the proposed NBAF site. Therefore, the proposed NBAF would have no direct impact on these species. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Birds are not susceptible to diseases that may be studied at the NBAF. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 8 Issue Code: 12.6

DHS notes the commentor's concern regarding the impact of the NBAF operation at the Texas Research Park Site on the area's current and future water resources. An evaluation of the impact from the proposed operation of the NBAF at the Texas Research Park Site Alternative on the potable water supply and infrastructure is located in Section 3.3.8 of the NBAF EIS. The estimated total annual water consumption for the NBAF operation at the Texas Research Park Site is projected to be 51,750,000 gallons per year. In addition, an evaluation of the impact from the NBAF operation on surface water and groundwater resources is located in Section 3.7.8. In times of severe drought DHS will work with local officials to ensure continued safe operation of the NBAF and, if necessary, curtailment of operations.

Comment No: 9 Issue Code: 18.6

Table 3.13.2.2-1 of the NBAF EIS provides estimated NBAF average and maximum daily wastewater generation rates by location. Wastewater handling is discussed in Sections 3.3.2.2. (origins, pretreatment, factors impacting the volume of wastewater) and sanitary sewage discharge from the Texas Research Park Site is discussed in Sections 3.3.8.1.4 and 3.13.9.3. As shown on Table 3.13.2.2-1, operation of the NBAF at the Texas Research Park Site is projected to result in an average daily discharge of 79,900 gallons of wastewater per day or just over 29,163,500 gallons of wastewater per year.

Comment No: 10 Issue Code: 18.6

As discussed in Section 3.13.9.3 of the NBAF EIS, NBAF wastewater discharged to the sanitary sewer would have to comply with the City of San Antonio's Pretreatment Ordinance for wastewater.

Section 3.13.2.2, Table 3.13.2.2-2 summarizes the pretreatment technologies applicable to biological and infectious waste streams ultimately destined for sanitary sewer discharge. Pretreatment ensures that wastewater discharged to sanitary sewers is no longer infectious.

As discussed in Section 3.13.2.2 of the NBAF EIS and shown on Table 3.13.2.2-4, the type of carcass/pathological waste disposal technology chosen will impact the level of total suspended solids (TSS) in the wastewater. Onsite filtration is only one of many different methodologies that could be used to lower TSS levels in wastewater if this is required to meet San Antonio Water System sewage acceptance criteria. Until the NBAF location is chosen and the facility design is further along, DHS cannot determine if any technology will be required to reduce TSS levels in wastewater. If TSS reduction is required, filtration is only one of many technologies that could be used. Consequently, DHS cannot speculate as to what size filter is required if TSS reduction is necessary, and if filtration is chosen as a technology to accomplish TSS reduction.

Comment No: 11 Issue Code: 18.6

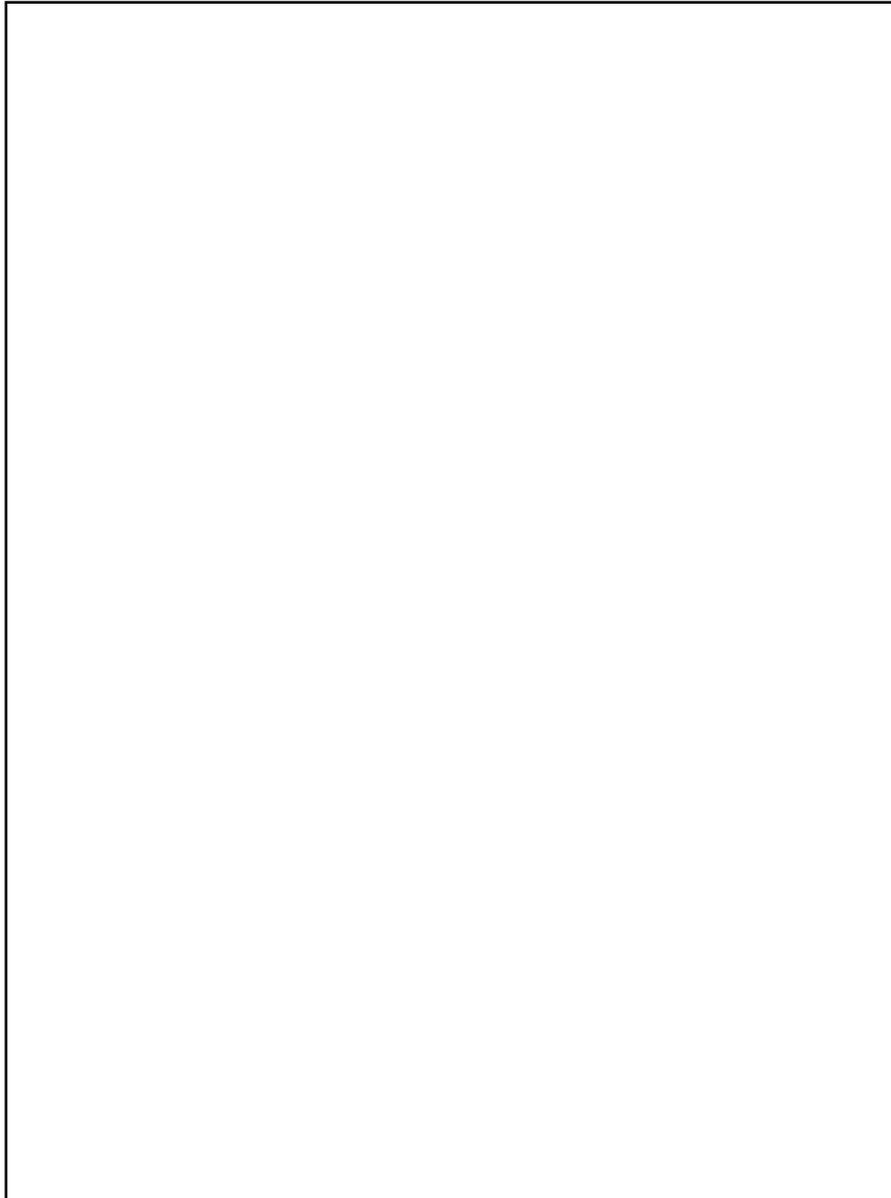
Sections 3.3 and 3.13. of the NBAF EIS address the fate of treated wastewater generated by the proposed NBAF. Sections 3.3.8.3.4 and 3.13.9.3 specifically address the fate of treated wastewater at the proposed Texas Research Park location. As discussed in these sections, it would be discharged into a San Antonio Water System (SAWS) sewer line to the Medio Creek Water Recycling Center (WRC). DHS shares the commentor's concern for the region's rivers and creeks, and the NBAF would be designed and operated as necessary to prevent negative impact to the Medio Creek WRC treatment capabilities. The NBAF would be subject to the same drought restrictions applicable to similar facilities served by the SAWS.

Comment No: 12 Issue Code: 23.0

DHS held a competitive process to select potential sites for the proposed NBAF as described in DEIS Section 2.3.1. A multi-disciplinary team of engineers, scientists, lawyers, academics and communicators from the departments of Homeland Security, Agriculture, Health and Human Services, and Defense reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the EIS as alternatives for the proposed NBAF.

Comment No: 13 Issue Code: 23.0

Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies. A separate Threat and Risk Assessment (TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal



regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. The TRA and security actions that would be implemented, based on TRA recommendations, are designated as For Official Use Only.

Comment No: 14 Issue Code: 8.6

DHS notes the commentor's concerns about reliability of electric power to the NBAF. Section 3.3.8 of the NBAF EIS includes an assessment of the current infrastructure at the Texas Research Park Site and potential effects from construction and operation of the NBAF. No electric power constraints have been identified for the Texas Research Park Site. Should a site be selected for NBAF, any needed infrastructure improvements to ensure service reliability would be identified in accordance with the final facility design. In the event of a power outage, the NBAF would have generators and fuel storage to operate safely. In the event that there is an unplanned, prolonged power outage, there would be standard operating procedures to safely shut down operations.

Beavin, Susan

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FRC1 : S & J Beavin FAX NO. : 2106956627 Aug. 25 2008 05:10PM P3 FD0086

This May 27, 2009 revision supersedes and replaces all other editions and/or working drafts of Citizens Master Plan from the Hill Country of Northwest Bexar County and Medina County, Texas.

CITIZENS MASTER PLAN

from The Hill Country that includes Northwest Bexar County and Medina County, Texas, hereafter referred to as The Hill Country, not to exclude adjacent counties.

PREAMBLE

“We have not inherited the earth from our fathers,
we are borrowing it from our children”
(Native American saying)

Being mindful that we are stewards of this land for future generations,

We the People, taxpayers and those concerned with the good of the community, do hereby acknowledge The Hill Country is a non-renewable resource which is recognized by local, State and Federal Government and is home to an extremely important section of the Recharge, Contributing, and Transition Zones of the San Antonio segment of the Edwards Aquifer and the Trinity Aquifer and which provides:

15| 27

- Wildlife and wildlife habitat with its contributing geology, water, trees and vegetation,
- Water contribution, recharge, quantity and purity through its unspoiled watersheds, streams, creeks, and karst geology,
- Properties, communities and artifacts of historical, cultural, ecological heritage dating back to the time of ancient native migrations and settlements,
- Farms, ranches, and a high percentage of open green space,
- Good air quality and cooler temperatures,
- Starlit sky visibility,

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Comment No: 15 Issue Code: 27.0

DHS notes the submittal of the Citizens Master Plan for consideration.

Beavin, Susan

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FROM : S J Beavin

FAX NO. : 2106956627

Aug. 25 2008 06:11 PM P4

FD0086

This May 27, 2007 revision supersedes and replaces all other editions and/or working drafts of Citizens Master Plan from the Hill Country of Northwest Bexar County and Medina County, Texas

BE IT KNOWN HERE:

- Multiple ecoregions converge in The Hill Country
- Bexar County is one of the few Texas counties which are home to a most diverse indigenous plant and animal population which includes many endangered, rare and threatened species which are on record, certified, protected and promoted in perpetuity by local, State and Federal law.
- It has long been determined that The Hill Country and Edwards Aquifer Recharge, Contributing and Transition Zone, its Trinity Aquifer and its non-renewable resources are on record, certified, protected and promoted in perpetuity by local, State and Federal law.
- Damage to The Hill Country is in no way offset by the benefits to any other area.
- All governmental entities have the legal duty to comply with and enforce the laws which protect this area.

15 cont.] 27

Therefore, the purpose of the Citizens Master Plan, as prepared and supported by its resident landowners, individually and by the groups signed herein, is to preserve The Hill Country, a non-renewable resource, for the State of Texas, for our children and the community as a whole,

Therefore, an immediate moratorium is called on all development in The Hill Country to assure compliance with all local, State and Federal laws and until a comprehensive cumulative environmental impact study is completed.

Therefore, the Citizens Master Plan Committee, composed only of The Hill Country residents, with homestead qualifications, will work in conjunction with the other groups signed herein to oversee the creation and implementation of the above study.

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Becton, Lisa

Page 1 of 4

WD0679

From: [REDACTED] on behalf of Lisa Becton [LBecton@pork.org]
Sent: Monday, August 25, 2008 9:27 AM
To: NBAFProgramManager
Cc: Paul Sundberg; Patrick Webb
Subject: Submitted comments regarding the DHS Draft EIS
Attachments: NPB Comments DHS NBAF 2008.doc

I would like to submit comments on behalf of the National Pork Board regarding the Draft Environmental Impact Statement evaluation the NBAF site selection. Thank you.

Lisa Becton, DVM
Director of Swine Health and Research
National Pork Board
office: 515-223-2791
fax: 515-223-2646
email: lbecton@pork.org

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Becton, Lisa

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WD0679

National Pork Board

P.O. Box 9114 Des Moines, Iowa 50306 USA Phone: 515-223-2600 Fax: 515-223-2646



Regarding U.S. Department of Homeland Security, Draft Environmental Impact Statement

These comments are submitted on behalf of the National Pork Board. The National Pork Board was established by an act of Congress in 1985 and is responsible for the collection, distribution, and program accountability for the money generated by the pork Checkoff. A Board led by 15 pork producers creates programs in the areas of promotion, research, and consumer information. These programs support producers by providing them with information on many areas including swine health and pork safety.

After seeking input from subject matter experts, allied industry groups and reviewing applicable economic and risk assessment information, the National Pork Board poses the following questions to DHS on the Draft Environmental Impact Statement that is used to evaluate the suitability of the six different locations that are potential sites for the National Bio and Agro-Defense facility. National Pork Board looks forward to any answers, clarifications, or additional information from questions regarding the economic modeling and risk assessments conducted, that DHS can provide.

Our evaluation of the DEIS has raised several questions regarding the modeling assumptions for economic impact, risk assessment and assumptions of potential live swine losses that could be caused by the release of an FAD into the surrounding area of the proposed NBAF sites.

- 1|15.0 a. Is the economic impact of an FAD underestimated for additional animal losses? Does the USDA ERS economic modeling take into account the full scope of swine losses and subsequent economic impact to producers once borders (county and state) have been closed?

The USDA ERS model assumes that infection will occur on a small farrow to finish operation in the Midwest with little to no off-farm movements. The assumption of no off-farm movement is not representative of a large percentage of the swine industry and this can have a significant impact once borders are closed and herds are quarantined. U.S. hog production can be a multi-site operation with different phases located in multiple locations and even multiple states. Once an FAD is diagnosed, the subsequent border closure (to include both county and state) will prevent any further movement of production to other designated facilities. Within the quarantine zone, production cannot leave the farm. To stop production at a farm that has adult sows and sells small pigs for further feeding prior to market, it would take at least 29 weeks. That production is already in progress and the only other option for a producer who cannot house those upcoming animals is to euthanize them. For example, on a hypothetical 1100 sow farm, the expectation is to wean at least 500 pigs per week to the nursery and house approximately 3500 pigs in a typical continuous flow nursery for 6 weeks.

1

Comment No: 1

Issue Code: 15.0

DHS notes the commentor's concern regarding the USDA ERS model that is referenced in the NBAF EIS. USDA ERS is an independent study and had no direct relationship to the analysis and scenarios developed as part of the NBAF EIS. The USDA ERS economic model (No. ERR 57) entitled 'Economic Impacts of Foreign Animal Disease' describes a new modeling system that integrates epidemiologic model results with an economic model of the US agriculture sector to estimate a foreign animal disease outbreak in the U.S. The case-specific hypothetical FMD outbreak used to demonstrate the power of the model is not meant to be a typical or representative case of an FMD outbreak and was not used as a basis for the EIS. The Pork Board is correct in indicating that the model does not take into account the full scope of losses and subsequent economic impact to producers. The model would need to be expanded or separate economic impact studies conducted to address all of the economic concerns.

Becton, Lisa

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WD0679

At any given time, you will have on-farm, 1100 sows, 1800 piglets, 3500 nursery pigs for a total of 6400 animals. If you cannot ship those animals and they continuously keep farrowing and weaning, the amount of animals accruing on-farm is significant. If sows are euthanized, then the production losses occur for the sow and additional lost opportunity of the unborn piglets.

1Cont.15.0 b. Does the risk assessment and economic impact analysis of the proposed sites take into account the regional differences in transportation of swine within and between states? Is there an economic assessment of impact on the transportation industry once borders have been shut down due to diagnosis of an FAD?

1Cont.15.0; 2|17.0 On any given day, there are approximately 624,000 swine in transit within the United States. This includes slaughter animals (markets and culls), breeding stock movements, weaner and feeder pig movements. These movements are both intra- and interstate and for many producers, production has to cross state lines. There are significant regional differences that could impact the assessment of each of the sites proposed for the NBAF facility. For example, North Carolina ships many thousands of pigs to locations across the U.S. on a daily basis. The halting of this transit would be devastating to the health and welfare of the animals because of their accumulation on the farm when transportation quarantine would be enforced. Transportation from production dense regions of animals in early stages of disease that are yet undetected have the potential of infecting many more different farms in many different states further compounding the challenge of timely intervention and recovery.

Many pork production facilities do not own their own transportation equipment and choose instead to rely on contract haulers for critical shipments. Many of these contract haulers also back-fill loads with other species movements (for example, possibly live cattle) to help keep operating costs within reason. This back-haul of other species could lead to further infection of different animal sites, via transportation, if proper sanitation and biosecurity are not followed. Losses that don't appear to be accounted for in the provided risk assessment and economic modeling would include loss of income from shipments, equipment non-utilization and having to cover additional daily operating expenses with no immediate guaranteed income. Other secondary losses can be felt by suppliers of good and services to the agriculture industry.

c. The statement "No risk or economic modeling has been performed"... in Appendix D-1 is of concern. What was the reasoning to not perform an in-depth specific risk and economic impact individually for each of the different regions that are proposed as NBAF sites?

1Cont.15.0 3|21.0 While the use of available literature and the use of the USDA ERS report and the USDA NAADSM can provide insight into the costs of an FAD, there are significant differences between each region that do bear further analysis to take into account the impact on agriculture and specifically impact on the swine industry. Regional difference in production structure can have a significant impact on the costs of an outbreak. Interstate movement of swine, the presence or

Comment No: 2 Issue Code: 17.0

DHS notes the commentor's concern if the risk analysis and economic impacts analysis considered the regional differences in transportation of swine within and between states. The epidemiological modeling performed does capture regional differences in intra- and inter-state livestock movement. Inter-state livestock movement ceases following confirmation of FMDV and implementation of a national livestock movement ban, and there is reduced intrastate in the control areas. The consequence analysis performed does include information on estimated costs related to direct government interventions, industry losses due to control measures in affected areas (eg movement bans), and losses related to international trade. The economic component that summarizes costs related to industry impact includes costs related to extra expenses livestock producers will incur due to restrictions on livestock movement, but those are not called out separately for intra- and inter-state movements; rather, they are all inclusive and not just for transportation alone.

Comment No: 3 Issue Code: 21.0

DHS notes the commentor's concern. Appendix D to the NBAF EIS utilized a case study and literature review approach for assessing the potential economic damage to the U.S. economy if one of the pathogens proposed for study at the NBAF were to be released into the surrounding environment. Appendix D provides a review of relevant studies and research regarding economic costs of previous outbreaks of the pathogens being evaluated or simulations having been performed by academic researchers or agencies. To the extent feasible, the current study applies these event outcomes to the regional characteristics of each proposed alternative site to assess their relative economic vulnerability to possible pathogen releases from the NBAF. Section 3.14 and Appendix E of the NBAF EIS, is a risk assessment and investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. Economic modeling was not performed due to the availability of actual case studies or modeling results performed by others.

Becton, Lisa

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WD0679

absence of slaughter facilities, population density, available support infrastructure and production structure and facilities locations will have a definitive impact on the total eventual cost of an FAD. Even though a review was completed of the livestock population in the counties surrounding the proposed sites, the overall impact to the animal populations in each state needs to be taken in to account. There are significant differences in swine populations for each state and those differences will cause different economic affects should an FAD occur.

1Cont.115.0
3(Cont.)21.0

d. Were all options for the control of an FAD thoroughly investigated to help understand the economic impact should a release occur?

1Cont.115.0

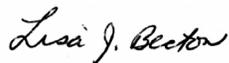
The USDA ERS modeling of economic impact only looked at destruction of infected animals in both direct and indirect contact scenarios but did not take into account the potential use for vaccination (FMDV control). Although this is not currently an approved control method within the United States, it may become a considered method and such an alternative should be evaluated to be able to understand the cost: benefit to the U.S. Agriculture industry. Without that comparison of cost and time to resume export of U.S. products, it is hard to have a true comparative economic impact analysis for a FAD outbreak.

4|26.0

In summary, the new facility will be essential to enhance the capabilities of our industry with regard to research, diagnostics and treatment for all foreign animal disease. The location of the NBAF must be decided based on an in-depth risk assessment and the proposed locations need to be re-examined based on the risk profile to see if the "island effect" can be recreated by siting the facility in an area with low densities of livestock and wildlife.

The National Pork Board appreciates the opportunity to comment on this Draft Environmental Impact Statement and looks forward to further opportunities to provide information about the U.S. pork industry that DHS can use to protect the U.S. swine herd from the introduction of foreign animal disease.

Sincerely,



Lisa Becton, DVM
Director Swine Health Information and Research
National Pork Board

3

Comment No: 4

Issue Code: 26.0

DHS notes the commentor's support for the NBAF mission as well as the commentor's concern that the proposed site alternatives should be determined by risk assessment that may be lowered based on livestock and wildlife densities. Other locations to construct the NBAF were considered in Section 2.4.3 of the NBAF EIS. These alternatives were considered but eliminated from detailed study in the EIS based on the evaluation criteria calling for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. These alternatives included remote locations such as an island, desert, or arctic habitat distant from populated areas or inhospitable to escaped animal hosts/vectors.

DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable it to be safely operated on the mainland. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species.

The decision on whether to build the NBAF will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

The Department of Homeland Security Under Secretary for Science and Technology Jay M. Cohen, with other Department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the Final NBAF EIS is published.

Beeman, Richard and Sylvia

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WD0804

From: sylvia beeman [REDACTED]
 Sent: Monday, August 25, 2008 5:12 PM
 To: NBAFProgramManager
 Subject: FW: deficient DEIS

From: [REDACTED]
 To: [REDACTED]
 Subject: deficient DEIS
 Date: Mon, 25 Aug 2008 15:55:13 -0500

Dear Program Manager,

1) 5.0 I am writing to say that I disapprove of the DEIS and the siting of the NBAF on the mainland,
 2) 25.4 particularly in Manhattan, Kansas. I have come to these conclusions after reading the extensive and
 impressive testimonies before the Committee on Energy and Commerce on 10-4-2007 and 5-22-2008 for
 the following reasons:

3) 21.0 1.) the DEIS does not answer the critical question of whether or not Foot-and-Mouth Disease can be
 done safely on the U.S. mainland. This question is particularly relevant to the Manhattan site where the
 DEIS reports that over half a million livestock are held within Riley County and adjacent counties.

2.) The DEIS makes invalid comparisons about safety in FMD research under BSL 3Ag conditions and
 BSL 4 labs in urban settings or with diseases of much lower contagion than FMD.

4) 18.0 3.) the DEIS does not specify by which method wastes will be disposed of. Disposal by incineration will
 5) 9.0 compromise the air quality of our community and the health, in particular, of the young, infirm, and
 aged. The Manhattan site is near a newly expanded retirement community and preschool, but no one of
 any age would appreciate the necessity of "modeling" our air quality standards to accommodate
 6) 18.4 increased air pollution from the NBAF. Disposal of liquefied NBAF waste through our sanitary sewer
 7) 12.4 system would be detrimental to the watershed in a state already near the bottom of the heap on quality
 of surface waters.

8) 13.4 4.) the DEIS does not adequately address detrimental effects to native wildlife.

5.) the DEIS judges the consequences of release of a disease agent through insect or tick vector could be
 significant. It does not detail how in such an event an escaped exotic disease could be prevented from
 3 cont. 21.0 becoming endemic. Manhattan presents many possibilities for spread of a releases pathogen because
 it is on a major avian flyway and home to many native mammalian and arthropod species.

6.) the DEIS does not adequately detail security measures for protecting the NBAF from terrorist attack,
 9) 23.0 oversight protocol of lab operation, screening of hires, training in biosafety or staff, or during sample
 transport to and from the facility.

7.) the DEIS does not lay out what the financial responsibilities are to the community after initial
 10) 2.0 construction, in the case of an accident or pathogen release, for upkeep, or for cleanup when the facility
 becomes obsolete.

Comment No: 1 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 2 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 3 Issue Code: 21.0

The NBAF would provide state-of-the-art biocontainment features and operating procedures to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Sections 3.8.9, 3.10.9, and 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from a accidental or deliberate pathogen, including FMD, release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 4 Issue Code: 18.0

DHS notes the commentor's concern about waste disposal. Section 3.13.2.2 of the NBAF EIS identifies the waste streams that would be generated by the operation of the facility. Table 3.13.2.2-2 identifies the origins of and pretreatment technologies applicable to waste streams destined for the sanitary sewer, Table 3.13.2.2-3 identifies the origins of and pretreatment technologies applicable to solid waste streams destined for offsite treatment or disposal facilities, and Table 3.13.2.2-4 compares technologies being considered for carcass/pathological waste disposal. As discussed in Section 3.13.2.2, incineration is only one of the technologies being considered for carcass and pathological waste disposal. Because it is the technology with the greatest potential to impact air quality, however, the Air Quality analysis in Section 3.4 assumes that only incineration would be used so as to estimate the worst-case impact.

DHS agrees that existing infrastructure at any chosen NBAF location has to be adequate to handle proposed NBAF operations. Section 3.3.4.3.4 of the NBAF EIS explains that the City of Manhattan, Kansas is currently designing a new wastewater treatment plant and that the wastewater discharge projections for the proposed NBAF are being incorporated into the design criteria for the new plant. As discussed in this section, the NBAF would be designed and operated as necessary to prevent negative impact from either flow rate or constituents to the capabilities of the City of Manhattan

wastewater treatment plant.

Comment No: 5 Issue Code: 9.0

DHS notes the commentor's air quality concerns. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Section 3.4.1 describes the methodology used in assessing potential air quality consequences at each site. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF would not significantly affect the region's ability to meet air quality standards.

Comment No: 6 Issue Code: 18.4

Please see response to Comment No. 4.

Comment No: 7 Issue Code: 12.4

DHS notes the commentor's water quality concerns. The NBAF EIS Section 3.7.1 describes the methodology used in assessing each alternative sites' water resources. Section 3.7.4 specifically addresses the Manhattan Campus Site's water resources and the affects and potential consequences from construction and operation of the proposed NBAF. Section 3.13 describes the proposed NBAF's liquid and solid waste management options and Section 3.3.4.3.4 describes the Manahattan, Kansas sewage acceptance criteria and pretreatment requirements that the proposed NBAF would have to meet.

Comment No: 8 Issue Code: 13.4

DHS notes the commentors concern regarding potential effects on wildlife at the Manhattan Campus Site. As indicated in Sections 3.8.4.2 and 3.8.4.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on wildlife. The NBAF would affect pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 9 Issue Code: 23.0

A separate Threat and Risk Assessment (TRA) (designated as For Official Use Only) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies.

Comment No: 10 Issue Code: 2.0

DHS notes the commentor's concern regarding the state and local government's cost associated with constructing the NBAF. Funding for the design, construction, and operations for the NBAF will come from the Federal Government. Proposals for offsets to the site infrastructure (part of the construction costs) were requested by the Federal government. The decision as to what to offer (land donation, funding, other assets) is solely as the discretion of the consortium, state and local officials as part of the consortium bid site package. The amount of funding and how the funding is paid for (bonds, taxes, etc) is determined by the state and local government officials and not the decision of the Federal government.

DHS notes the commentor's question regarding whether oversight of NBAF operations would include representatives from local municipalities. Procedures and plans to operate the NBAF will include the Institutional Biosafety Committee, which will include community representatives as described in Section 2.2.2.6 of the NBAF EIS. Should a decision be made to build NBAF and the site selected, DHS would begin transition and operational planning which would include consideration of policies and procedures for public participation, education, and also public advisory initiatives. After DHS determines the viability and nature of such a public advisory and oversight function, appropriate roles and responsibilities would be defined.

Beeman, Richard and Sylvia

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WD0804

11| 1.0 | 8.) the DEIS does not deal at all with the problem of dual purpose. While I concede that research on dangerous and exotic pathogens is important, it would be unacceptable for the NBAF to produce bioweapons. Yet, in the wrong hands, legitimate research could be easily turned to evil purpose.

10 cont.| 2.0 | 9.) the DEIS does not deal with the issue of secrecy and transparency. Already our community suffers from the problem of qualified specialists being afraid to voice opinions against the NBAF for fear of losing their funding or jobs. Cover-ups of accidents have occurred at other BSL 3 and 4 labs due in large part to research facilities' fear of losing funding. There have been many instances of research facilities not being forthcoming after Freedom of Information Act requests. It was made clear to the Committee on Energy and Commerce that no government agency knew how many BSL3 and 4 labs were in existence, who was working in the labs, what agents or pathogens were being worked on in the labs, and whether adequate background checks had been done on employees of the labs. The DEIS does not indicate how any of these problems would be addressed.

12| 21.4 | 10.) The DEIS minimizes the danger of natural disasters at the manhattan site. The government is currently involved in an \$800,000,000 project to upgrade our dam to protect against flooding after a seismic event. Apparently someone in the government think the potential for earthquake is significant here. Also, as the severe weather event in June illustrated, a level 5 tornado is a possibility which could destroy even a reinforced concrete structure.

10 cont.| 2.0 | In addition, I would like to voice my concern about the apparent disregard of the DHS for the research of other governmental agencies and apparently even for its own research, if we can believe the recent widespread "leaks" about Mr. Cohen's boosting of the Flora, MS, site on the NBAF short list.

2 cont.| 25.4 | I urge you not to place the NBAF in Manhattan, KS, anywhere on the mainland, or possibly anywhere at
1 cont.| 5.0 | all, until a comprehensive study is done to determine if proliferation of the research proposed for the
10 cont.| 2.0 | NBAF is even necessary beyond what is being pursued in existing labs. The NBAF is not just of concern to me as a resident of [REDACTED] KS, but also as a citizen thinking of he welfare of our whole country.

Sincerely,
Sylvia C. Beeman

[REDACTED]
[REDACTED] KS
[REDACTED]

Comment No: 11 Issue Code: 1.0

DHS notes commentator's concern that NBAF not become involved in bioweapons research. Chapter 1, Section 1.1 of the NBAF EIS clearly identifies NBAF's mission as defensive which would preclude involvement in offensive bioweapons research or development. The international treaty known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies.

Comment No: 12 Issue Code: 21.4

DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of a range of reasonable alternatives for locating, constructing and operating the NBAF and the No Action Alternative. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. Sections 3.4, 3.6, and 3.14.3.2 and Appendix E of the NBAF EIS, address NBAF design criteria and accident scenarios associated with natural phenomena events such as earthquakes, floods and tornadoes.

DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period.

In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Beeman, Richard and Sylvia

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WD0671

From: Dick Beeman [REDACTED]
Sent: Monday, August 25, 2008 3:03 PM
To: NBAFProgramManager
Subject: concerns about NBAF

1|24.1;
 2|19.0;
 1Cont|24.1

Dear sir or madam: I want to register my strong disapproval of the idea of locating the NBAF research lab near centers of human or livestock populations. Human fallibility being what it is, and humans being the imperfect creatures that they are, there can be no justification for such an unnecessary danger. The best place to conduct such research is an island location, such as the Plum Island location. I urge you to place this lab at the original site of the Plum Island lab. Thanks for letting me register my concern.

Dick Beeman

Comment No: 1 Issue Code: 24.1

DHS notes the commentor's opposition to the five mainland site alternatives and support for the Plum Island Site Alternative.

Comment No: 2 Issue Code: 19.0

DHS notes the commentor's concern regarding the potential consequences from a NBAF accident as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Training and inherent biocontainment safeguards will minimize the likelihood of a release from the NBAF. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. Oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

Behnke, Rosalie

Page 1 of 1

WD0492

From: Rosalie Behnke [REDACTED]
Sent: Friday, August 22, 2008 12:41 PM
To: NBAFProgramManager
Subject: National Bio and Agro-Defense Facility

- 1) 25.4 | Just an addition comment on why Manhattan, KS is a poor choice--besides the
 2) 21.4 | tomado risk, it is downstream from Tuttle Creek Dam which is build on a
 3) 11.4 | major fault. There is potential for dam breakage and flooding of the whole
 4) 21.4 | town, potentially spreading dangerous organisms into the river system
 feeding into the Mississippi river system, and contaminating the entire
 middle US.

Thanks for the opportunity for feedback.

Rosalie K. Behnke, [REDACTED] Veterinary

[REDACTED] KS [REDACTED]

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

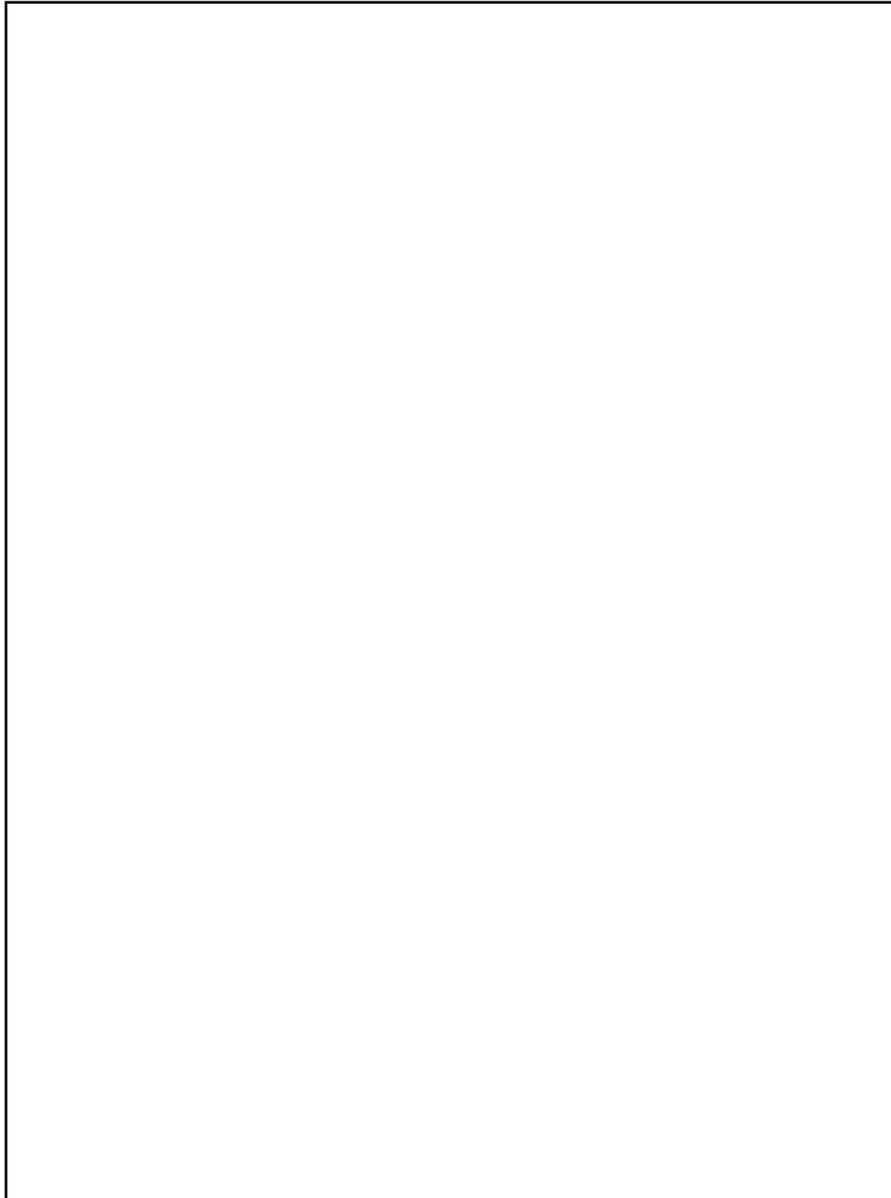
Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period.

In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 3 Issue Code: 11.4

DHS notes the commentor's concerns regarding earthquakes. Section 3.6.1 of the NBAF EIS describes the methodology used to assess each site's potential seismic consequences, and Section 3.6.4 specifically describes the Manhattan Campus Site. Section 3.6.4.1 discusses the Humboldt Fault system. The NBAF would be built to meet or exceed all applicable building codes for seismic safety. Section 3.14.3.2 further addresses NBAF design criteria and accident scenarios associated with natural phenomena events such as earthquakes and tornados. DHS notes the commentor's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing



of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 4

Issue Code: 21.4

DHS notes the commentor's concern regarding potential natural disaster impacts to the NBAF. Sections 3.4, 3.6, and 3.14.3.2 and Appendix E of the NBAF EIS, address NBAF design criteria and accident scenarios associated with weather-related events such as tornadoes, hurricanes, and flooding.

Please refer to Comments No. 2 and 3.

Behnke, Rosalie

Page 1 of 1

WD0650

From: Rosalie Behnke [REDACTED]
Sent: Friday, August 22, 2008 12:19 PM
To: NBAFProgramManager
Subject: National Bio and Agro-Defense Facility

1|25.4 I would like to voice my vehement opposition to the proposal to house this facility in Manhattan, Kansas or the mainland US. Great Britain has shown evidence that even in high security facilities mistakes and "leaks" can happen and we do not want this to happen in the heart of livestock country. This facility would also be a serious potential terrorist target. Locating it in a college town where the diverse, ever changing population would make it easy for a terrorist cell to remain invisible, is asking for a strike against the facility in an attempt to damage the US economy. Also, being in "tomado alley," a facility in Manhattan, KS would be at risk of breaches due to uncontrollable weather. Just this year the town dodged a bullet when the tomadoes that hit did not cause problems with the nuclear reactor research.

2|21.4;
3|19.4

1Cont.|25.4;
2|24.1 Please do not locate this in Kansas. Ideally, building a new facility on Plum Island makes the most sense for the security of the US and protection of our livestock industry.

Rosalie K. Behnke, [REDACTED]
 [REDACTED] KS [REDACTED]

Comment No: 1 Issue Code: 25.4

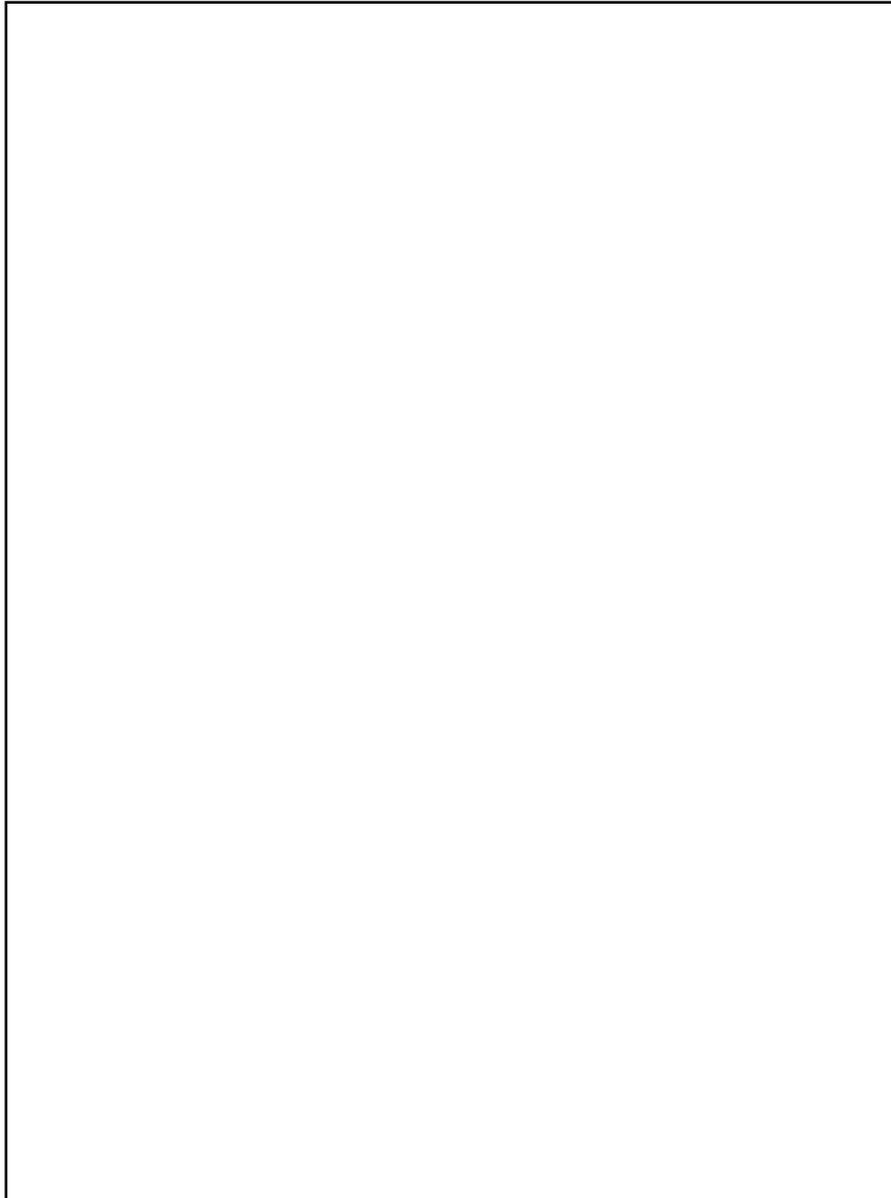
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative and support for the Plum Island Site Alternative.

Comment No: 2 Issue Code: 21.4

The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. As examined in Section 3.14 and Appendix E of the NBAF EIS, the risk of an accidental release of a pathogen is extremely low. The EIS economic (Section 3.10 and Appendix D) and risk analysis (Section 3.14 and Appendix E) acknowledge and assess the accidental FMD releases in Great Britain. The proposed NBAF design would incorporate engineering features and operational procedures to prevent or mitigate an accidental or deliberate pathogen release from any of the BSL laboratories within the NBAF. Appendix B describes biocontainment lapses and laboratory acquired infections in the United States and world-wide. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

DHS notes the commentor's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period.

In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.



Comment No: 3

Issue Code: 19.4

DHS notes commentor's concern. Section 3.14 addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (TRA) (designated as For Official Use Only) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies.

Bell, PhD, Sarah

Page 1 of 1

WD0157

From: [REDACTED] on behalf of [REDACTED]
Sent: Friday, August 01, 2008 5:52 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager:

1| 2.0 | In the movie "Sneakers" there is a disturbing phrase concerning a computer chip which removes encryption: "Too
 2| 25.2 | many secrets." I believe that the NBAF project has the same problem: too many secrets, unanswered questions, and
 obfuscations to be credible. There are too many dangers of locating it in the midst of a Southern college town with
 precious and already scarce water resources nearby. We do not want NBAF here!

Please consider the rights of the people already living here.

Sincerely,

Sarah V. Bell, Ph.D.

[REDACTED]
 [REDACTED] GA [REDACTED]
 [REDACTED]

Comment No: 1 Issue Code: 2.0

DHS notes the commentor's lack of trust in the federal government. Section 3.14 and Appendix E of the NBAF EIS state that the specific objective of the hazard identification is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Appendix B describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operation of the NBAF then site-specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed the NBAF. Procedures and plans to operate the NBAF will include community representatives as described in Section 2.2.2.6.

Comment No: 2 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Bell, PhD, Sarah

Page 1 of 1

WD0716

From: [REDACTED]
Sent: Monday, August 25, 2008 12:18 PM
To: NBAFProgramManager
Cc: [REDACTED]
Subject: NBAF in Athens, GA

Mr. Jamie Johnson, National Director of Laboratories, NBAF Program Manager

Dear Sir:

Thank you for coming to Athens on August 14, 2008 to hear directly from the people who will be involved and affected if you choose Athens for the site of the NBAF. I believe that you heard many perspectives, at least half of which were in opposition to its location here. Let me add my voice to that group.

I have followed the discussion of NBAF, its goals, and its consequences quite carefully. While it is true that there is NO human effort which is flawless, the possible flaws of this one are without peer. In fact, I was astounded to hear Chuck Pergler say in the Athens meeting that "Accidents will happen in this facility." I was so astounded that I wrote the comment down. This level of risk is simply too great to put

- 1|21.2: n close proximity to a large University
 2|12.2: n close proximity to a water supply for thousands of people, which is depleted because of drought
 3|15.2: n close proximity to the State Botanical Gardens, which cannot help but be affected
 n close proximity to land used for farming of crops as well as animals for consumption
 n close proximity to a bird sanctuary
 n close proximity to large populations of innocent civilians in two counties

4|11.2 In fact, if I had asked someone to choose the **worst possible location** for a high risk facility dealing with "high-consequence diseases," this person would have picked the Milledge Avenue site! It is flawed in every conceivable way, including, surprisingly, geologically! One geologist mentioned that considerable blasting would be necessary to provide for a below-ground facility on this bedrock.

5|22.2 Please, I urge you, reject this site. The site in Texas, to my way of thinking, offers the best site because it will isolate the certain accidents to come with its 1800-acre perimeter. There is NO BUFFER for the Athens site. As far as I can tell, there are NO PLANS for mitigation, in case of the escape of one mosquito! In a damp Southern town with plenty of other mosquitoes, this escape alone is reason not to house NBAF here. The desert region of Texas would not have the same problems.

6|25.2 I can assure you that, if you choose the Athens site, there will be litigation, protests, and constant strife. We understand the reason for the NBAF's existence, though its goals may be questionable, but we cannot urge you strongly enough to reject Athens as its home. Regardless of the parade of those possibly hoping for future employment, who spoke in favor of it, there is a sleeping giant of residents in the area who will fight it in court, if necessary.

Thank you for your kind attention.

Sarah V. Bell, Ph.D.

[REDACTED]
 [REDACTED] GA [REDACTED]

Comment No: 1 Issue Code: 21.2

The NBAF would provide state-of-the-art biocontainment features and operating procedures to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Sections 3.8.9, 3.10.9, 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from an accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 2 Issue Code: 12.2

DHS notes the commenter's concerns regarding facility water usage and DHS acknowledges regional drought conditions. As described in the NBAF EIS Section 3.7.3.3.1, the South Milledge Avenue Site would use approximately 118,000 gallons per day which is approximately 0.76% of Athens' 15.5 million gallons per day usage. The NBAF's annual potable water usage is comparable to the annual potable water usage of approximately 228 residential homes. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.13.4 describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste and Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

DHS notes the commenter's concern regarding the proximity of the site to the State Botanical Garden and the Whitehall Forest Important Bird Area (IBA). As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden or IBA. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with the IBA. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high-value forested riparian corridor would be preserved; and therefore, the NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and the IBA. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Birds are not susceptible to diseases that are

currently designated to be studied at the NBAF. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF. Furthermore, the purpose of the NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

DHS notes the commentor's concern. DHS is aware of the presence of the health and correctional facilities, described in Section 3.10.7.1. DHS has held public meetings and conducted outreach efforts to ensure that the surrounding communities, including officials of the health and correctional facilities, are aware of the proposed action. The risks and associated potential effects to human health and safety were evaluated and are presented in Section 3.14. The risks were determined to be low for all site alternatives.

Comment No: 3 Issue Code: 15.2

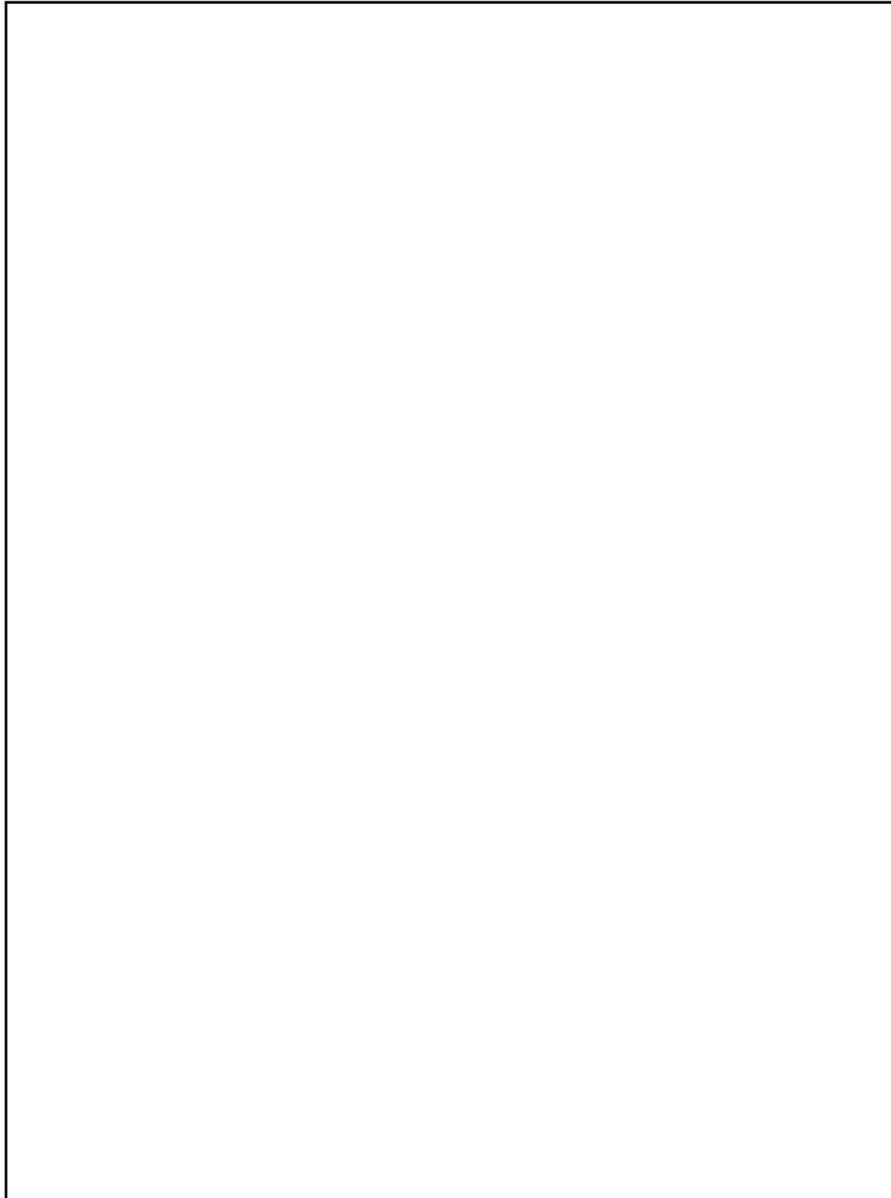
Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Comment No: 4 Issue Code: 11.2

DHS notes the commentor's construction in bedrock concerns. The NBAF EIS Section 3.6.3 describes the South Milledge Avenue Site alternative's soil and geological conditions and Section 3.6.3.2 describes potential construction consequences. A detailed geotechnical report will be prepared for the selected site and will be used in the NBAF's final design specifications including subsurface rock strata and construction implications.

Comment No: 5 Issue Code: 22.2

DHS notes the commentor's support for the Texas Research Park Site Alternative in lieu of the South Milledge Avenue Site. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment.



An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations was evaluated in Section 3.8.9 and Section 3.10.9 as well as in Section 3.14 (health and Safety). DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. RVF and FMD SOPs and response plans would likely include strategies that are similar. However, the RVF response plan would also include a mosquito control action plan.

Comment No: 6

Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Beres, Brad

Page 1 of 1

WD0229

From: [REDACTED] on behalf of Brad Beres [REDACTED]
Sent: Monday, August 11, 2008 4:43 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1 | I understand why Athens, GA was chosen as a potential site for the bio-terror lab. Although labs like these are
 2 | needed there locations must be chosen through more logical processes. As I am not against the building of the lab
 3 | itself, I am EXTREMELY against the location that has been chosen within Athens.

4 | Building a lab like this in the location that has been chosen would have disastrous results on one of the last beautiful
 5 | places in Athens, the Georgia Botanical Gardens. When a building of that size is constructed one must also think
 6 | about the parking lots that come with it. When it rains on a blacktop many chemicals from cars and other machines
 7 | are washed into our already dirty Oconee River. These hazardous materials then get into our waterways polluting
 8 | them and the surrounding areas. This can then cause fish, bird, mammal, and reptile kills.

9 | Furthermore, the water runoff itself causes erosion. If some research is done on the river one would find that the
 10 | Oconee has already been subjected to massive amounts of sedimentation. Problems such as this have caused fish
 11 | species to become endangered. One such fish is the Robust Redhorse which is a species of fish that is native to the
 12 | Oconee river south of Athens. Excessive erosion in Athens would eventually find its way downstream, thus making
 13 | recovery even tougher.

14 | Another reason this is a bad location for the lab, is if one simply looked a few hundred yards further and saw
 15 | Whitehall Forest. Whitehall Forest is an extremely important area for UGA students to study, learn, and conduct
 16 | research. Not only is this area important for students and faculty, but it is important for native wildlife. Whitehall
 17 | forest is one of the last places in Athens for many species of wildlife to live without fear of being developed. You
 18 | can find birds, mammals, and reptiles there that do not exist ANYWHERE else in this county. If the rivers are
 19 | polluted this could have devastating affects on the animals, furthermore if there were to be any disease outbreaks
 20 | this area would be a prime place to transfer the diseases.

21 | I understand that an EIS is being conducted to understand the affects of the lab on the surrounding area. As
 22 | someone who has many colleagues in the field of environmental consulting I KNOW that things are overlooked and
 23 | that these impact statements are not as thorough or detailed as they should be.

24 | I ask that you take these things into consideration when making your choices on the location of the lab. There are
 25 | many areas just outside of Athens that would make much better locations than the ones chosen. You could start
 26 | your search in Madison, Oconee, and Jackson counties.

Thank you for your time.

Sincerely,
 Brad Beres
 [REDACTED]

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 13.2

DHS notes the commentors concern regarding the proximity of the South Milledge Avenue Site to the Botanical Garden. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant wildlife impacts in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's concerns regarding water pollution. As described in the NBAF EIS Sections 3.7.3.2 and 3.7.3.3, the NBAF will be required to comply fully with all federal, state and local stormwater management permitting requirements for both construction and ongoing operations. Section 3.7.3.3.2 recognizes that the effluent volume and constituents would contribute to the general trend of increased stormwater runoff in the region of interest, but with stormwater controls in place, the NBAF storm water contribution is not anticipated to be substantial. Additional information is found in Section 3.13.4 Waste Management and Section 3.14 Health and Safety.

Comment No: 4 Issue Code: 12.2

DHS notes the commentor's concerns regarding erosion and surface water runoff. As described in the NBAF EIS Sections 3.7.3.2.1 and 3.7.3.3.1, the NBAF will be held to all local, state, and federal buffer, erosion control, stormwater, and spill planning and permitting requirements. As discussed in Section 3.7.3.3.2, it is anticipated that with the enforcement of all regulations concerning runoff quantity and quality, and the installation of site features designed to address anticipated runoff, the

NBAF stormwater contribution is not anticipated to be substantial; however, the effluent volumes and constituents would contribute to the general trend of increased stormwater runoff.

Comment No: 5 Issue Code: 13.2

DHS notes the commentors concern regarding potential effects on wildlife in the vicinity of the South Milledge Avenue Site. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on Whitehall Forest. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife.

Section 3.5.5.3 addresses operational noise impacts associated with the proposed NBAF. Minor noise impacts would result from an increase in traffic and operation of the facility's filtration, heating, and cooling systems. Section 3.5.5.3 describes noise-attenuating design features that would minimize noise emissions. In the event of a power outage, operation of back-up generators could have a short-term impact on wildlife by discouraging utilization of immediately adjacent habitats. Routine operations at the NBAF would not be likely to have significant noise impacts on wildlife. Security requirements at the proposed NBAF would require continuous outdoor nighttime lighting. Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. Unshielded lighting can shine upward and interfere with bird migration, disorienting birds and causing them to collide with structures. Birds are attracted to lights and may collide with lighted structures. Most concerns involve lighting associated with high-rise buildings and tele-communication towers; however, even residential lighting can affect some birds. The USFWS advocates the use of shielded lighting to minimize adverse impacts on migratory birds. Shielded fixtures direct light downwards and can be used to keep light within the boundaries of the site. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigation measures, such as those described above, will be considered in the final design of the NBAF. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. However, the use of shielded lighting would minimize the potential for impacts in adjacent habitats. Given the relatively low profile of the building and the use of mitigation measures, significant lighting impacts on migratory birds would not be likely to occur.

The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant wildlife impacts in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that

modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction. Construction and operation of the NBAF would not place any restrictions on public use of Whitehall Forest.

Comment No: 6 Issue Code: 21.2

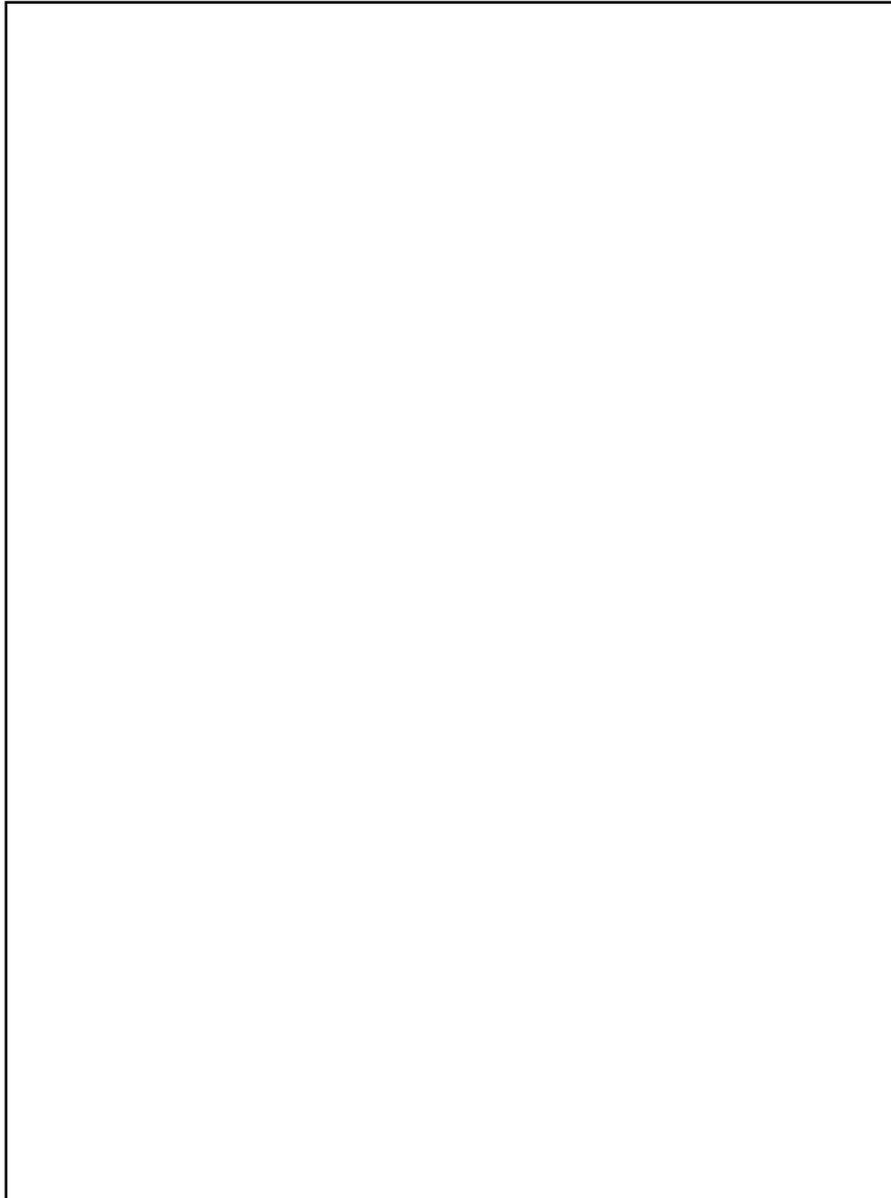
The DHS notes the commentor's concern with the risks associated with a pathogen release. The NBAF would provide state-of-the-art biocontainment features and operating procedures to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Sections 3.8.9, 3.10.9, and 3.14 (Health and Safety), and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from an accidental or deliberate pathogen release. Pathogen release scenarios include for example, an analysis of the potential consequences of Rift Valley Fever (RVF) virus becoming established in native mosquito populations. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. RVF and FMD SOPs and response plans would likely include strategies that are similar. However, the RVF response plan would also include a mosquito control action plan.

Comment No: 7 Issue Code: 4.0

DHS notes the commentor's statement. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of a range of reasonable alternatives for locating, constructing and operating the NBAF. As summarized and presented in Section 3.1 of the EIS, DHS has analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives.

Comment No: 8 Issue Code: 5.0

DHS held a competitive process to select potential sites for the proposed NBAF as described in Section 2.3.1 of the NBAF EIS. A multi-disciplinary team of engineers, scientists, lawyers, academics and communicators from the departments of Homeland Security, Agriculture, Health and Human Services, and Defense reviewed the submissions based primarily on environmental suitability and



proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the EIS as reasonable alternatives for the proposed NBAF.

Berg, Belinda

Page 1 of 1

PD0091

August 18, 2008

1|15.4; 2|25.4 My name is Belinda Berg and I'm a private citizen and I live on a farm and I am very concerned that building this facility will ruin our economy in this area as far as agriculture - as far as raising cattle, or pigs. I think that it's a very bad thing for our community.

3|21.4 I think that the disease component is devastating to our community in light of the fact that a lot of bacteria and viruses are actually smarter than we are. They know how to reproduce. They know how to mutate. They know how to survive in an environment and I think that they've survived in the environment a lot longer than we have as humans. And, I think that this is going to be probably the thing that will destroy our community and our livestock industry in this area.

And I really am against it. It must be stopped.

Once again, my name is Belinda Berg. My phone number is [REDACTED]

Comment No: 1 Issue Code: 15.4

DHS notes the commentor's concern. The potential economic effects of an accidental release are discussed in Section 3.10.9 and Appendix D of the NBAF EIS. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the economic effect would be significant for all sites. To the extent possible, the NBAF EIS identifies differences in the magnitude of potential adverse impacts among the candidate sites if an accidental release of a pathogen were to occur.

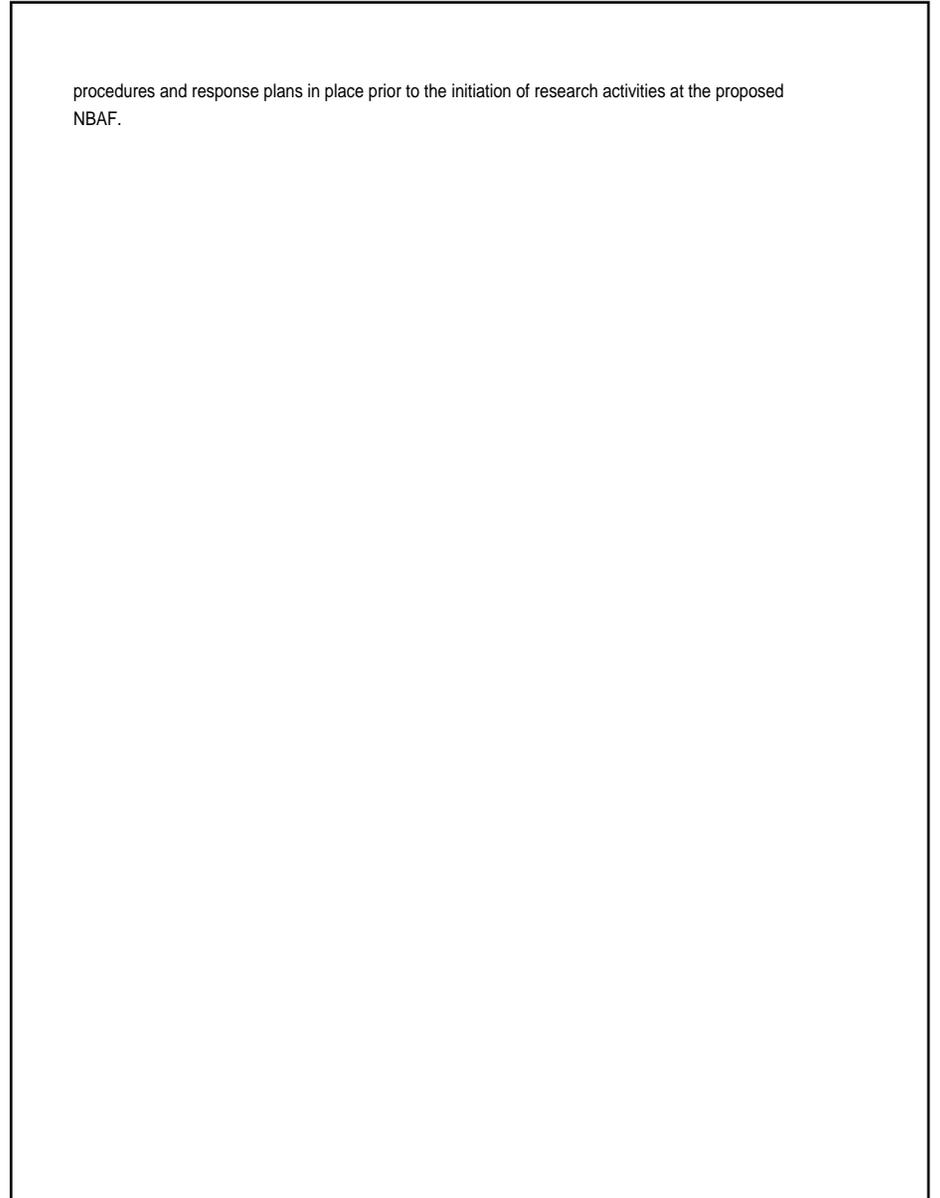
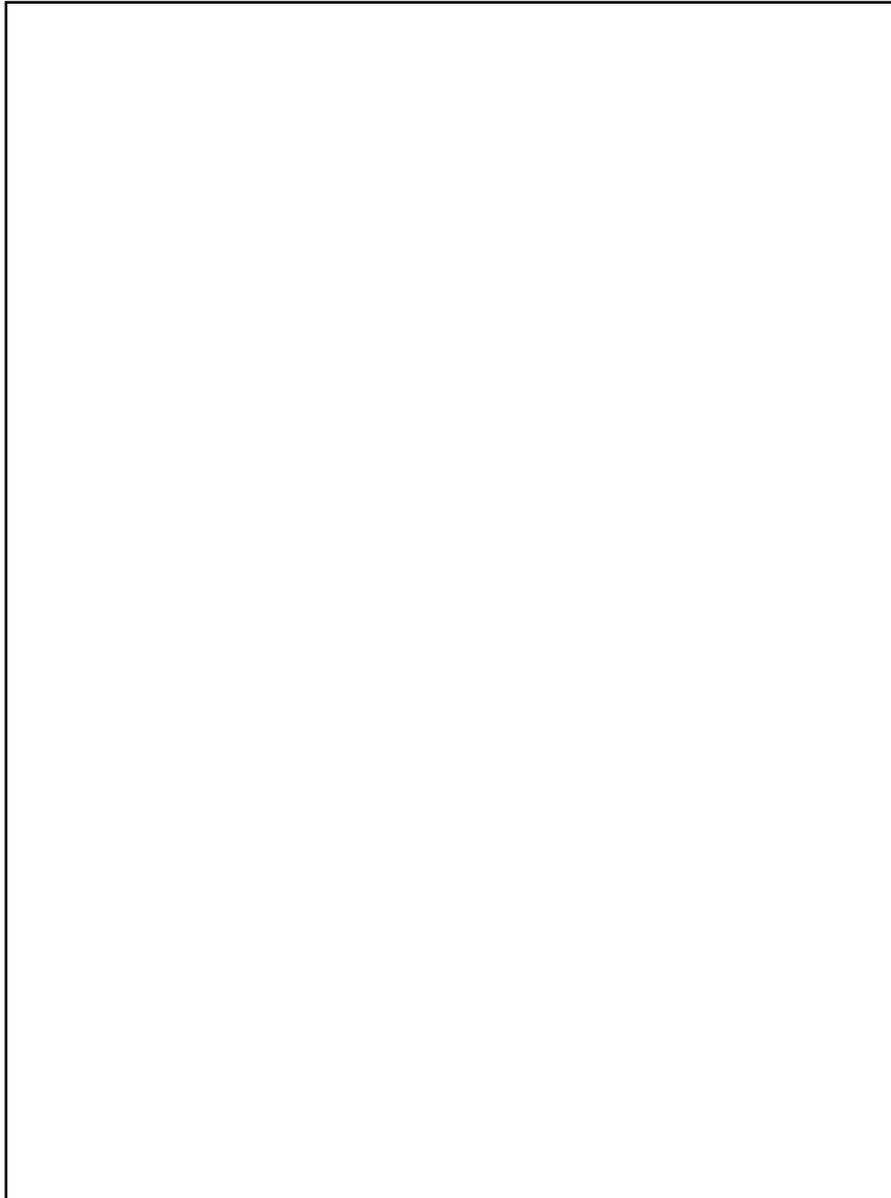
DHS has identified its Preferred Alternative in Section 2.6, which was based on a multitude of factors of which the safety of the human and physical environment and the protection of the U.S. livestock sector are paramount. A Record of Decision that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

Comment No: 2 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 3 Issue Code: 21.4

DHS notes the commentor's concern regarding the socioeconomic impacts from an NBAF accident. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere. To prevent or mitigate the potential affects to communities and livestock industries should the NBAF Record of Decision call for the design, construction, and operations of the NBAF site specific protocols would be developed, in coordination with local emergency response agencies. DHS would have site-specific standard operating



Berg, Harold

Page 1 of 1

PD0092

August 18, 2008

Okay,

1|25.4 My name is Harold Berg. I'm one of the owners of the Berg Heifer Ranch up here at
[redacted] and I am very much opposed to that facility that they propose to build down there
at Manhattan.

2|5.0 I think they could put it someplace where they're away from as much livestock there is
around here.

1 cont.| Therefore I don't think it ought to be built here. I know that they need something like
25.4; that, but they can put it someplace away from the best livestock and the best livestock
2 cont.| country in the world.
5.0

I thank you. And again my name is Harold Berg.

I thank you much.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's preference for siting the NBAF in a remote location.

Berg, Wayne

Page 1 of 1

PD0093

August 18, 2008

Okay,

1|25.4 This is Wayne Berg from up here north of [REDACTED] and sure maybe they need something like that, but they don't need it right here where the best livestock best pasture country - cattle country there is in the world, and then put something like that up here - scatter some more germs.

I don't want anything like that. I don't know of anybody else that does either. So, better reconsider that and take that into consideration - what it could do to the human race.

Okay. Thank you much. I'm Wayne Berg.

Again, thank you.

Comment No: 1

Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Berger, Doug

Page 1 of 2

WD0482

From: Sen. Doug Berger [REDACTED]
Sent: Friday, August 22, 2008 12:03 PM
To: NBAFProgramManager

Dear Homeland Security,

I am the state Senator who represents Butner in the North Carolina General Assembly. I am writing to express my opposition to Butner being selected as the site for the NBAF project. Last September 2007, I joined a bi-partisan group of legislators in giving support to the NBAF being located in North Carolina. Since that time, I submitted a list of questions at one of the public meetings conducted by Homeland Security. Many of these questions were not answered or were not answered to my satisfaction by the draft Environmental Impact Statement. It is clear from this process that a site will be selected and that such issues as whether the facility will be manned by public or private security will not be determined prior to site selection. I made it clear from the outset I would withdraw my support for this project if the security for this facility was privatized as has been the case at Plum Island.

In order for the NBAF project to successfully locate in an area, there must be trust between the local community and the federal government. Local law enforcement officials and emergency medical services officials must work closely with community members to develop plans for the safe movement of the samples of diseases that will be transported in and out of the facility. This local coordination must also take place in order for a meaningful evacuation plan to safely transport the developmentally disabled and the mentally ill at area institutions to be developed as well. Homeland Security's prior history as well as its lack of responsiveness to both opponents and proponents of the NBAF during the selection process has so eroded public confidence that there is absolutely no trust between the local community and Homeland Security..

The critical point at which I began to seriously consider withdrawing my support for the NBAF and joining the opposition took place after the May 2008 Congressional GAO report was issued that challenged the research Homeland Security had put forward as evidence that research of hoof and mouth disease could be done safely on the mainland. After this report was released, our state Commissioner of Agriculture was unwilling to address the findings in the report even though he is charged with protecting North Carolina's food supply. The questions raised by the GAO report and the community's legitimate lack of trust of Homeland Security has led me to join the opposition to the NBAF being located here on the mainland in North Carolina.

The NBAF project no longer enjoys the support from elected officials that it had at the beginning of the site selection process. This evaporation of support is in direct response to the arrogant display of power and indifference by Homeland Security. Homeland Security has been unresponsive to questions posed by the City of Raleigh concerning the NBAF's impact on its key local water supply. Homeland Security has been unresponsive to the environmental questions posed by both the Durham County Commissioners and the Durham City Council. Each of these urban political bodies have joined their rural counterparts in Butner, Stem, Creedmoor, and Granville County in opposing or withdrawing support for the NBAF. Many elected leaders including myself gave ample opportunity for Homeland Security to be completely responsive to our constituencies and yet that did not occur.

Recent revelations that Mississippi is a finalist in the selection process has made it clear that the selection of the site will be based on politics. In closing I will make this promise to you. I will do everything within my power as co-chairperson of the Health and Human Services Subcommittee on Appropriations in the North Carolina Senate to oppose any legislation that involves state dollars for the funding of the infrastructure needed for the NBAF site. Do not select Butner as the site for the location of the NBAF.

Comment No: 1 Issue Code: 25.3

DHS notes the State Senator's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 4.3

D

DHS notes the State Senator's concern. DHS is committed to providing public access to pertinent information and has conducted a robust public participation program subsequent to the completion of the competitive site selection process, which is described in Section 2.3.1 of the NBAF EIS. To date, DHS has provided two opportunities for the public to provide comment and input to the environmental impact analyses presented in the NBAF EIS. An initial scoping comment period of 60 days followed the issuance of a Notice of Intent to prepare an EIS. Once a draft of the EIS was published, another notice was issued that provided 60 days for comment. DHS accepted comments submitted by various means: mail, toll-free telephone and fax lines, NBAF Web page, and public meetings. DHS gave equal consideration to all comments, regardless of how or where they were received. All comments received during the public comment periods have been considered in this NBAF EIS. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). Since the inception of the NBAF project, DHS has supported a vigorous public outreach program and has been as forthcoming as possible in disseminating information about NBAF as program planning has matured over time. The primary objective of the EIS is to evaluate the environmental impacts of a range of reasonable alternatives for locating, constructing and operating the NBAF. A period of 60 days was provided for public review and comment on the NBAF Draft EIS, which spanned from June 27 through August 25, 2008. During this comment period, public meetings were held in of the vicinity of the NBAF site alternatives and in Washington, D.C. DHS also accepted comments submitted by mail, toll-free telephone and fax lines, and online through the NBAF Web page (<http://www.dhs.gov/nbaf>). All comments, both oral and written, received during the comment period were given equal consideration and were responded to in the NBAF Final EIS. Decisions on whether to construct and operate the NBAF and, if so, where, will be based on the analyses presented in the NBAF EIS and other factors such as cost, engineering and technical feasibility, strategic considerations, policy considerations, and public input. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

DHS notes the commentator's opposition to the five mainland site alternatives and reference to the U.S. Government Accountability Office report (May 2008) as justification. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable it to be safely operated on the mainland. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the

lack of livestock and susceptible wildlife species.

Comment No: 3 Issue Code: 23.0

DHS notes the State Senator's opposition to use of a private security force. The decision to use government or private security forces to protect the NBAF has not been made. In all likelihood that decision will be made after the NBAF Record of Decision (ROD) is issued. Should the ROD call for the design, construction, and operations of the NBAF then site specific decisions would include the determination to use government or private security forces to protect the NBAF. Regardless of the decision, NBAF would have the levels of protection and control required by applicable DHS security directives.

Comment No: 4 Issue Code: 2.0

DHS notes the State Senator's statement regarding lack of trust between the local community and the DHS. DHS notes the State Senator's mistrust of the DHS due to the perception that there was a lack of communication during the site selection process. DHS also notes the State Senator's concerns regarding the U.S. GAO report. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated regardless of the location chosen.

Comment No: 5 Issue Code: 15.0

DHS notes the State Senator's concerns regarding an accident. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies, that would address special consideration populations residing within the local area.

Comment No: 6 Issue Code: 5.0

DHS notes the State Senator's statement. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated on the mainland.

Comment No: 7 Issue Code: 27.0

DHS notes the State Senator's statement.

Berger, Doug

Page 2 of 2

WD0482

Please include these comments for review by Homeland Security in preparation for its final draft of the EIS.

Sincerely yours,

Senator Doug Berger

Bergkamp, Scott

Page 1 of 1

WD0822

From: Scott Bergkamp [REDACTED]
Sent: Monday, August 25, 2008 6:04 PM
To: NBAFProgramManager
Subject: Manhattan KS

1| 5.4 | I urge you to place the National Bio and Agro-Defense Facility that is proposed in Manhattan, KS.
The people of Kansas will strongly support this facility.
Regards,
Scott Bergkamp

Comment No: 1 Issue Code: 5.4
DHS notes the commentor's support for the Manhattan Campus Site Alternative.

Bernal, DVM, Liliana

Page 1 of 1

WD0484

From: Liliana Bernal [REDACTED]
Sent: Friday, August 22, 2008 12:13 PM
To: NBAFProgramManager
Subject: I support NBAF in Kansas
Importance: High

1| 24.4 | I support NBAF in Kansas - It is the right place, with the right people with awesome resources.
Liliana Bernal

[Liliana Bernal, DVM, MSc](#) | Hill's Pet Nutrition, Inc. | Scientific Insights, Technical Information Services

[REDACTED] KS [REDACTED]

Comment No: 1

Issue Code: 24.4

DHS notes the commenter's support for the Manhattan Campus Site Alternative.

Berry, Mary

Page 1 of 1

WD0633

From: Mary Berry [REDACTED]
Sent: Saturday, August 23, 2008 9:59 AM
To: NBAFProgramManager
Subject: NBAF

1|25.2;
 2|19.2;
 3|9.2;
 4|7.2;
 5|6.2

I am writing to voice my opposition to locating the NBAF facility in Athens, GA. I do not think our community wants or needs the risk to air quality, environmental degradation, public health and safety. I do not want to see Athens lose the beautiful, undeveloped land adjacent to our State Botanical Garden on which NBAF proposes to build. In addition to other objections, this area of Georgia is in a drought and our community faces water restrictions on a weekly basis. We do not need a huge facility that uses vast amounts of this precious resource.

1Cont.|25.2 Please, locate somewhere off the coast where there are safety features built in. **We do not want NBAF in Athens.**

Thank you.

Mary B. Berry

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 19.2

DHS notes the commentor's opinion regarding the potential consequences of the selection of the South Milledge Avenue Site. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. A Record of Decision that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

Comment No: 3 Issue Code: 9.2

DHS notes the commentor's concerns regarding potential impacts to air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from energy generation, traffic, and incineration. Site-specific effects at the South Milledge Avenue Site alternative are discussed in Section 3.4.3. Air pollutant concentrations were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards.

Comment No: 4 Issue Code: 6.2

DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF.

Comment No: 5 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes.

Bilotta, Larry

Page 1 of 1

WD0304

From: Larry Bilotta [REDACTED]
Sent: Sunday, August 17, 2008 12:45 AM
To: NBAFProgramManager
Subject: NBAF location

Dear Sirs,

1|24.4 | I would like to voice my support in putting the National Bio and Agro-Defense Facility (NBAF) at Kansas State University. I believe there is no other place that best fits the requirements set forth by your Department. Bio research is already being conducted at he university. The College of Veterinary Medicine has world recognition for its excellence. Many other prominent universities in the region have given their support for the NBAF being built in Manhattan and have offered their cooperation. Kansas State University is an outstanding educational and research environment. Manhattan is a self-contained, warm and friendly community that supports the university 100% making it a great place to live and work.

The Kansas City area is a great supporter of the university and its research. I hope you give Manhattan and K-State your full consideration and decide it is the best location to put the NBAF.

Sincerely,

Larry Bilotta

[REDACTED] Missouri [REDACTED]

Comment No: 1

Issue Code: 24.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative.

Binkow, Harry

Page 1 of 1

WD0466

From: Harry Binkow [REDACTED]
Sent: Thursday, August 21, 2008 5:09 PM
To: NBAFProgramManager
Subject: NBAF..., Athens, GA

To Whom It May Concern:

- 1| 25.2 | As a homeowner, registered voter, and taxpayer in the [REDACTED] GA community, I would like for you to know of my dissatisfaction with the current Athens-Clarke County Government interest in locating your facility in my community.
- 2| 11.2 | Our community has been land stripped by developers over the past five years, which has caused serious erosion, plant and tree destruction, as well as the displacement of wildlife from their environments.
- 3| 12.2 | Further, over the past seven years, we have experienced severe drought conditions and mandatory guidelines to combat them. Athens, GA is both a historical city and an academic community for higher learning. This was what it's founding fathers dreamed and hoped for when establishing the oldest chartered institution in The United States of America.
- 4| 18.2 | We have nowhere to dump or store the hazardous wastes your compound would bring to a laboratory facility. We also have no water to service the facilities needs. The thought of ACC and UGA condoning the relocation of your facility here is an insult to our community. I wish to express my clear and unequivocal opposition to the very thought of such a laboratory being constructed in Clarke County, Georgia.
- 1 cont. | 25.2

Harry Binkow

[REDACTED]
GA [REDACTED]Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 11.2

DHS notes the commentor's surface runoff concerns. Section 3.7.3 of the NBAF EIS describes standard methods used to prevent and mitigate potential spills and runoff effects. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Chapter 3 Section 3.7.3.2 describes available construction erosion control techniques such as engineered filter fabric fences, drop inlet protection, grassy swales, sedimentation ponds, and stormwater reuse.

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF annual potable water usage is comparable to 228 residential homes' annual potable water usage.

Comment No: 4 Issue Code: 18.2

Section 3.13.2.2 of the NBAF EIS presents information on the disposition of wastes that would be generated by the operation of the facility. As shown on Tables 3.13.2.1-1 and 3.13.2.1-2, the State of Georgia is a net importer of municipal solid waste and a net exporter of hazardous waste. The ability of Georgia to import waste from and export waste to other jurisdictions suggests that disposal capacity for solid and hazardous waste is adequate.

Bishop-Martin, Elizabeth

Page 1 of 2

WD0744

From: Elizabeth Bishop-Martin [REDACTED]
Sent: Monday, August 25, 2008 2:34 PM
To: NBAFProgramManager
Subject: NBath Facility, Athens, Ga.

To Whom it May Concern:

1|25.2 | I am writing to voice my protest against the NBAF facility being placed in Athens, Ga. My reasons are as follows:

2|19.2 | 1. The many concerns for system failure and the resulting possibility of contracting one of the diseases being studied. I live in the "danger radius" and feel that it is unrealistic of the DHS to place a facility of this type in so highly populated an area.

3|8.2 | 2. The infrastructure in this area is already stressed due to the increased population in Oconee County as well as the high number of apartments that are being built in this area. The traffic on Simonton Bridge Rd. and Whitehall wall seems to increase daily. During the morning rush hour, it has become impossible for me to leave my street to go anywhere. This, of course, impacts emergency vehicles as well as private transportation.

I realize that this has been noted and that changes will have to be made, however, I feel they will not be adequate to our growing population and, further, will be a financial burden on our state and local government, as well as our tax base.

4|12.2 | 3. For the past several years we have suffered a consistently worsening drought. While many of us, as well as the University of Georgia, have taken strong measures to reduce our water use, many have not. A facility of this type will only further stress our available water. Very soon we will be placed in the position of purchasing water from outside sources which may or may not be available.

5|7.2 | 4. As an environmentalist and artist, I find the proposed desecration of this riparian landscape unacceptable. I realize that the University will eventually build something on this land, however, a facility as large as the one proposed is not the right choice. The destruction of the environment, the ensuing light pollution (which will be clearly visible from my home) are just two of the reasons I find this size structure highly objectionable.

1|25.2 (cont.) | I hope you will take these comments seriously and, of course, I do know that you have heard many similar ones both in meetings and via email, etc. Please remember that the unanimous voice of university scientists is representative of the University and NOT the Community at large, who will benefit little from NABF.

I am sure you will find one of the other sites more compatible

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 19.2

DHS notes the commentor's concerns regarding the health and safety of densely populated communities surrounding the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies, that would consider the diversity and density of populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 3 Issue Code: 8.2

DHS notes the commentor's concern. Section 3.3.3 of the NBAF EIS includes an assessment of the current infrastructure at the South Milledge Avenue Site Alternative, the required infrastructure improvements and potential effects from construction and operation of the NBAF.

Comment No: 4 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes.

Comment No: 5 Issue Code: 7.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area.

Bishop-Martin, Elizabeth

Page 2 of 2

WD0744

1/25.2
(cont.) with the environment and area for building than the one in Athens, Ga.

Sincerely,

Elizabeth Bishop-Martin

[Redacted]
Ga.

Black, Bryan

Page 1 of 2

WD0732



August 25, 2008

U.S. Department of Homeland Security
 Science and Technology Directorate
 James V. Johnson, Mail Stop #2100
 245 Murray Lane, S.W., Bldg 410
 Washington, D.C. 20528

Dear Mr. Johnson,

This letter provides comments of the National Pork Producers Council (NPPC) on the Draft Environmental Impact Statement (DEIS) for the National Bio and Agro-Defense Facility (NBAF).

NPPC is a national association representing 43 affiliated states; it is the voice in Washington, D.C., for more than 67,000 pork producers. The U.S. pork industry generates more than 550,000 jobs in the United States; including input suppliers, producers, processors, handlers and Main Street businesses. Overall, an estimated \$20.7 billion of personal income and \$34.5 billion of gross national product are supported by the pork industry.

1|25.0 NPPC does not support the "no action alternative" as discussed in the DEIS. Because of trade, travel and commerce in the 21st century, the livestock industry is at the greatest risk in its history of economic devastation from the introduction of foreign animal diseases. The existing facility on Plum Island is no longer capable of meeting the needs of the U.S. livestock industry in today's environment. The research and diagnostic work to be carried out in the NBAF is absolutely essential to the economic well-being of the industry, and the construction of a new facility is long overdue.

2|26.0 NPPC believes the process of selecting sites for analysis by soliciting interested institutions was flawed and precluded from consideration sites that might be better suited

Comment No: 1 Issue Code: 25.0

DHS notes the commentator's opposition to the "No Action" alternative and support for the proposed research that would be conducted within the NBAF and support for replacement of the PIADC facility.

Comment No: 2 Issue Code: 26.0

DHS notes the commentator's support for the NBAF mission as well as the commentator's concern that the proposed site alternatives should be determined by risk assessment that may be lowered based on livestock and wildlife densities. Other locations to construct the NBAF were considered in Section 2.4.3 of the NBAF EIS. These alternatives were considered but eliminated from detailed study in the EIS based on the evaluation criteria calling for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. These alternatives included remote locations such as an island, desert, or arctic habitat distant from populated areas or inhospitable to escaped animal hosts/vectors.

DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable it to be safely operated on the mainland. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species.

The decision on whether to build the NBAF will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

The Department of Homeland Security Under Secretary for Science and Technology Jay M. Cohen, with other Department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the Final NBAF EIS is published.

Black, Bryan**Page 2 of 2**

WD0732

to conducting such high-risk work. Consideration was given only to sites that were in "proximity to research programs that could be linked to the NBAF."

2/26.0
(cont.)

NPPC believes first consideration should have been given to developing a risk profile of the work to be carried out in the NBAF. Such a profile should include: (1) the existence of susceptible animal populations that could be exposed to an outbreak should disease organisms escape from the facility; (2) the ability of the Federal and state governments to quickly control and eradicate the disease; (3) the environmental consequences and impact on wildlife populations of an outbreak; and (4) the economic consequences to the livestock industry if an outbreak were to occur. The DEIS analysis of the site specific consequences of release of the foot and mouth disease virus were shown to be essentially the same for all mainland sites considered. This, we believe, is the critical flaw in soliciting sites based on institutional interest versus risk.

NPPC urges that no decision be made on a location for the NBAF until the current DEIS is supplemented with an analysis of other sites based on the risk profile of the work being done. The risk of disease spreading due to animal population densities cannot be ignored nor mitigated entirely by technology. NPPC believes this additional step must be taken before a Record of Decision is completed based on the limited analysis in the current DEIS.

Attached are comments of our industry partner, the National Pork Board. We fully endorse its comments and urge their full consideration before any NBAF site is selected.

Sincerely,



Bryan Black
Canal Winchester, Ohio
President
National Pork Producers Council

The Global Voice for the U.S. Pork Industry

122 C Street N.W., Suite 875 • Washington, D.C. 20001 • 202.347.3600 • Fax: 202.347.5265

Blackburn, Ann

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08/22/2008 15:03 [REDACTED] BANKPLUS PAGE 01/01
FD0044

AUGUST 22, 2008

**US DEPARTMENT OF HOMELAND SECURITY
MR JAMES V JOHNSON
245 MURRAY LANE, SW BUILDING 410
WASHINGTON, DC 20528**

DEAR SIRs:

1| 24.5 | **MISSISSIPPI AND MYSELF WOULD TRULY EMBRACE THE
OPPORTUNITY FOR NEW JOBS. IN DOING SO THIS WILL KEEP
OUR BRIGHT YOUNG MEN AND WOMEN IN MISSISSIPPI**

THANK YOU FOR YOUR HELP IN THIS MATTER.

ANN BLACKBURN


Comment No: 1 Issue Code: 24.5
DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

Blackford II, Joe

Page 1 of 7

WD0641

From: Joe Blackford II [REDACTED]
Sent: Friday, August 22, 2008 7:55 PM
To: NBAFProgramManager
Subject: NO to NBAF until systemic failure of security in BSL-4 Labs is corrected (ASAP)

1|27.0
President Dwight D. Eisenhower presented the following ominous thoughts in his Military Industrial Complex Speech of 1961:

My fellow Americans:

This evening I come to you with a message of leave-taking and farewell, and to share a few final thoughts with you, my countrymen. . . .

. . .Akin to, and largely responsible for the sweeping changes in our industrial-military posture, has been the technological revolution during recent decades.

In this revolution, research has become central; it also becomes more

Comment No: 1 Issue Code: 27.0

DHS notes the information submitted by the commentor; however, it is not within the scope of the NBAF EIS, which evaluates the environmental impact of the no action alternative and the alternatives for constructing and operating the NBAF.

Blackford II, Joe

Page 2 of 7

WD0641

formalized, complex, and costly. A steadily increasing share is conducted for, by, or at the direction of, the Federal government

1Cont.|27.0

The prospect of domination of the nation's scholars by Federal employment, project allocations, and the power of money is ever present and is gravely to be regarded.

Yet, in holding scientific research and discovery in respect, as we should, we must also be alert to the equal and opposite danger that public policy could itself become the captive of a scientific-technological elite.

It is the task of statesmanship to mold, to balance, and to integrate these and other forces, new and old, within the principles of our democratic system -- ever aiming toward the supreme goals of our free society.”

Blackford II, Joe

Page 3 of 7

WD0641

1Cont.127.0

Eisenhower warned us of the actions currently being taken by Kansas State University and *The Manhattan Mercury* regarding the National Bio and Agro-Defense Facility (NBAF).

2|8.4

KSU created new administrative positions to foster the public's perception of the need for agro- and bio-security; and hired KSU Veterinary Medicine alumni retiring from the United States Army Medical Research Institute of Infectious Diseases (USAMRIID) at Fort Detrick, MD:

- • COL David R. Franz, D.V.M., Ph.D.,
Commander
- COL Gerald P. Jaax, D.V.M. Chief of the
Veterinary Medicine Division
- COL Nancy K. Jaax, D.V.M. Chief of
Pathology

The FBI announced on August 6, 2008, that its completed investigation found Dr. Bruce Ivins

Comment No: 2Issue Code: 8.4

DHS notes the commentor's statement. The scope of the NBAF EIS does not include personnel decisions made by State Universities.

Blackford II, Joe**Page 4 of 7**

WD0641

to be the sole suspect in the killing of five people through anthrax-tainted letters in 2001. More than 30 years ago, Dr. Ivins was hired to study anthrax vaccines at the USAMRIID.

As specifics of the FBI's investigation come out, we will find that none of these Colonels has ever managed a truly secure BSL-4 lab where researchers receive a Top Secret clearance prior to working with the weapons of bio and agro-terrorism.

All Kansans should be concerned about KSU's appointment of these retired USAMRIID Colonels as administrators responsible for securing the location of the National Bio and Agro-Defense Facility at KSU.

This concern should not be based upon whether our Country needs the NBAF, nor the safety of the Facility. Neither should we be anxious about whether or not the economic benefit of the NBAF would bring riches to Manhattan, or one of the other sites.

Kansans should instead be troubled by the lack

Comment No: 4Issue Code: 15.4

DHS notes the commentor's viewpoint.

1Cont|27.0

2Cont|8.4

4|15.4

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of information on the level of security to be maintained by NBAF under DHS protocols. Will the security level be commensurate with the dangers of having BSL- 4 laboratories in our midst? Will the scientific-technological elite working at NBAF undergo vigilant background checks to weed out possible bio-terrorists?

Nancy Jaax and Ivins both researched inhalation anthrax in the rhesus monkey.

Jerry Jaax has run a “dog and pony show” since 9/11, serving as “KSU’s Chicken Little of Bioterrorism” to tout the need for an NBAF-type BSL-4 lab, traveling to small towns and rural areas, as well as conventions, legislative committees, Chambers of Commerce, and a multitude of assorted gatherings.

Dave Franz has run labs in Maryland for his former USAMRIID contractors:

- Southern Research Institute (SRI) 1998 - 2002

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- Midwest Research Institute (MRI) 2003

In 2004, Southern Research Institute inadvertently FEDEXed live anthrax bacterium to a non-BSL-4 lab in California, exposing six researchers who believed they were working with a dead sample.

1Cont.127.0

KSU hired a reporter from *The Manhattan Mercury*, Katie Mayes, as Bioscience News Coordinator. Katie funneled assurances on the safety of, and dire need for, the NBAF in Manhattan from KSU's scientific-technological elite to her former employer. Editorial Page Editor, Walt Braun, printed these as opinions. Executive Editor Bill Felber assigned cub reporters hired since 2007 to cover NBAF as front-page news. When I asked the only long-term reporter to cover NBAF, Mark Scott, on March 18, 2008, if he could provide the names of the Jaaxes from his NBAF reading file, I was told *The Mercury* had no such file on the NBAF.

Readers have been lulled to complacency by *The Manhattan Mercury* and KSU. I believe

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1Cont.[27.0

President Eisenhower would have viewed *The Mercury's* and KSU Media Relation's concerted efforts on NBAF as collusion at the very least, or perhaps as propaganda, of the scientific-technological elite he warned us of 47 years ago.

Joe Blackford II

Joe Blackford II is a Kansas native and retired Department of Defense Civilian. From 1981 to 1985 he worked at the Defense Mapping Agency Aerospace Center, [REDACTED] a TOP SECRET- Sensitive Compartmentalized Information Facility employing 3600 of the scientific-technological elite. He lives [REDACTED] (as the germs fly) from the proposed site of the KSU NBAF.

STOP Do not add me to any database. I am prepared to ask my Representative to initiate a Congressional Letter regarding any DHS collection of data on individuals either for, or against, building the NBAF on the USA mainland.

Blair, Dana

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WD0360

From: dana blair [REDACTED]
Sent: Tuesday, August 19, 2008 2:31 PM
To: NBAFProgramManager
Subject: no thank you

1|25.2; I am a concerned citizen, wishing to voice my concerns over nbaf locating in Athens, Ga. Surely
2|5.0 there is a safer, less populated place for this lab to locate!!! I hope you will consider the wishes
of so many in the community ,that are against the lab coming to Athens. Dana

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 5.0

DHS held a competitive process to select potential sites for the proposed NBAF as described in DEIS Section 2.3.1. A multi-disciplinary team of engineers, scientists, lawyers, academics and communicators from the departments of Homeland Security, Agriculture, Health and Human Services, and Defense reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the EIS as alternatives for the proposed NBAF.

Bliss, Donna Leigh

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WD0854

From: Donna Leigh Bliss [REDACTED]
Sent: Monday, August 25, 2008 9:12 PM
To: NBAFProgramManager
Subject: No to NBAF in Athens

Hello

1) 5.2 | After carefully reviewing arguments for and against placing the NBAF in Athens, Georgia, I am opposed to such a move. I think the risks of the NBAF, while perhaps small, are still too great for this facility to be
2) 5.1 | placed in Athens, or anywhere on the mainland of the United States, for that matter.
Donna Leigh Bliss

Comment No: 1 Issue Code: 5.2

DHS notes the commentator's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 5.1

DHS notes the commentator's opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though the Plum Island Site has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species. In addition, security concerns will be considered in the selection of the Preferred Alternative.