

Harvey, Gloria

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PD0223

August 22, 2008

1|24.5

This is Gloria Harvey. I am a citizen of [REDACTED] Mississippi and calling in support of the National Bio and Agro Defense Facility being located in Flora, Mississippi.

A contact number for me is [REDACTED]

Thank you.

Comment No: 1

Issue Code: 24.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

Harvin, George

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WD0287

From: George [REDACTED]
Sent: Friday, August 15, 2008 12:35 PM
To: NBAFProgramManager
Cc: [REDACTED]
Subject: In Support of the Proposed NBAF Facility in Butner, NC

To Whom It May Concern:

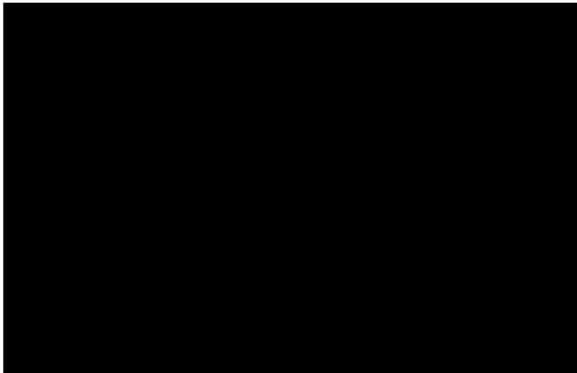
1)24.3 As a rural resident of [REDACTED] North Carolina, and residing close to the Granville County line, I
wish to advise the necessary parties that I and most of my neighbors support the proposed NBAF facility
in Butner, NC. I like the idea that it will use US Government land so no land cost is involved. Primarily, I
2)15.3 welcome the jobs that our distressed rural area desperately needs.

Please do not be overly affected by the few noisy opponents. The John Locke Society is vocal in this
area. They may be the source of the complaints you are hearing. (The John Locke Society does not like
anything any government does!).

2 cont. | As a business manager, the demand for more skilled workers in the area would be a real plus for sluggish
15.3 economy.

Good luck! Please advise if there is a way I might be more supportive.

Thank you for considering our area for this facility.



Comment No: 1 Issue Code: 24.3

DHS notes the commentor's support for the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 15.3

DHS notes the commentor's support for the Umstead Research Farm Site Alternative. The economic
effects of NBAF on the Umstead Research Farm Site are discussed in Section 3.10.7 of the NBAF
EIS.

Hawkes, Candace

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WD0651

From: [REDACTED] Candace Hawkes [REDACTED]
Sent: Friday, August 22, 2008 12:26 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

1|25.2; I am adamantly opposed to having this lab placed in Athens. It is too close to my home for comfort. I have a small
 2|21.2 horse farm with sheep and goats that are extremely healthy and I want them to stay that way. Having the lab placed
 so close to them puts my animals at risk. As an Athens taxpayer, I protest this lab.

2Cont.|21.2; I have a friend that works on Plum Island and she is not allowed anywhere near farms, fairgrounds or any other
 1Cont.|25.2 venue that houses farm animals because of risk of cross contamination. Several years ago, many areas in Europe
 were quarantined due to pathogens that will kill animals. You dare to put these pathogens in my backyard? I say
 NO! I will protest and do whatever possible to insure the safety of my animals, my farm and my community. That
 means keeping you OUT!

1Cont.|25.2; I have a degree in Veterinary Lab Technology, so I speak from my heart, from common sense and have an educated
 4|24.1 opinion. The risks of placing your facility here far outweigh any benefit Athens may receive from your placement
 here. Keep the Lab on an island where it belongs! Do not put this community at risk for what could be a major
 catastrophe should we ever have a catastrophic event in Athens.

2Cont.|21.2 Even so, its the small mistakes in everyday life at the lab that could have the most disastrous results in Athens.
 Please leave this town alone. You are not wanted here.

Sincerely,

Candace Hawkes
 Home and Farm Owner and taxpayer [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: 21.2

DHS notes the commentor's concerns regarding the impact of a pathogen release on local livestock. 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. 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. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, 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. 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. 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. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Plum Island Site Alternative is provided in Section 3.11.6 of the NBAF EIS. An emergency response plan, which would include area evacuation plans, would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations.

Comment No: 3 Issue Code: 21.2

DHS notes the commentor's concern about the risk to health and safety from the NBAF operation. 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 with a minimal degree of risk, regardless of the site chosen. 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 (including PIADC SOP that employees working with FMD virus in biocontainment will not have contact with cattle, sheep, goats, deer and other ruminants and swine for a period of 5 days after working in biocontainment) 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: 24.1

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative and support for the Plum Island Site Alternative.

Hawks, Sharon

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WD0178

From: Sharon Hawks [REDACTED]
Sent: Tuesday, August 05, 2008 9:15 AM
To: NBAFProgramManager
Subject: National Bio and Agro Defense Facility

1) 25.3 | My name is Sharon Hawks and I live approximately [REDACTED] from the proposed facility. I have 2 small
 2) 2.0 | children and an a native North Carolinian. I STRONGLY OPPOSE THIS FACILITY and feel that the
 decision to place it in this location was made in secret and in hopes of misleading the people of NC.
 There is no question that this is an area of homeowners who probably have no idea that this facility is
 going to be built nor would they respond (even if they had the means) even if they did. However, the
 adjacent communities of Duke University of NC and NC State University are very aware of the intent of
 the facility and we will fight you tooth and nail.

Best Regards,

Sharon J. Hawks
 [REDACTED]

Comment No: 1 Issue Code: 25.3

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

Comment No: 2 Issue Code: 2.0

DHS notes the commenter's lack of confidence in the DHS and concerns regarding safe facility operations. Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 24 public meetings have been held in the vicinity of NBAF site alternatives and in Washington D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered DHS has also provided fact sheets, reports, exhibits, and a Web page (<http://www.dhs.gov/nbaf>). Additionally, various means of communication (mail, toll-free telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance.

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. 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 with a minimal degree of risk, regardless of the site chosen.

Hayes, G David and Valerie

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WD0629

From: [REDACTED]
Sent: Saturday, August 23, 2008 10:27 AM
To: NBAFProgramManager
Subject: Public Comment in Opposition to Athens, Georgia Site

Ladies and Gentlemen -

1|25.2 We are writing to express our opposition to the proposed NBAF site, planned for Milledge Avenue in Athens. As health providers and researchers, we both understand the important work conducted by NBAF and we understand the need for a new facility. However, we believe that the location currently sited in Athens is an inappropriate choice because of its close proximity to educational, residential and agribusiness property.

2|21.2 While the prospects of a problem with the new facility may be remote, accidents (or intentional misuse) do happen. We can only look to the recent determination that the anthrax deaths came at the hands of one of the country's own scientists. Placing a high risk research facility so close to students and this community's agricultural business sector is questionable at best and negligent at

3|15.2 worst. The U.S. government has access to other property options which are not nearly as close to the population and economic center of a given community. The national government has an ethical and moral duty to make decisions in the best interest of the safety and wellbeing of the community. Placing the new NBAF facility at the Milledge Avenue property would not be in keeping with the government's duty.

1Cont.|25.2

Thank you for allowing us to provide input. We are hopeful that DHS will consider its full range of options and select a more remote site.

Sincerely -

G. David and Valerie Hayes
[REDACTED]Comment No: 1 Issue Code: 25.2

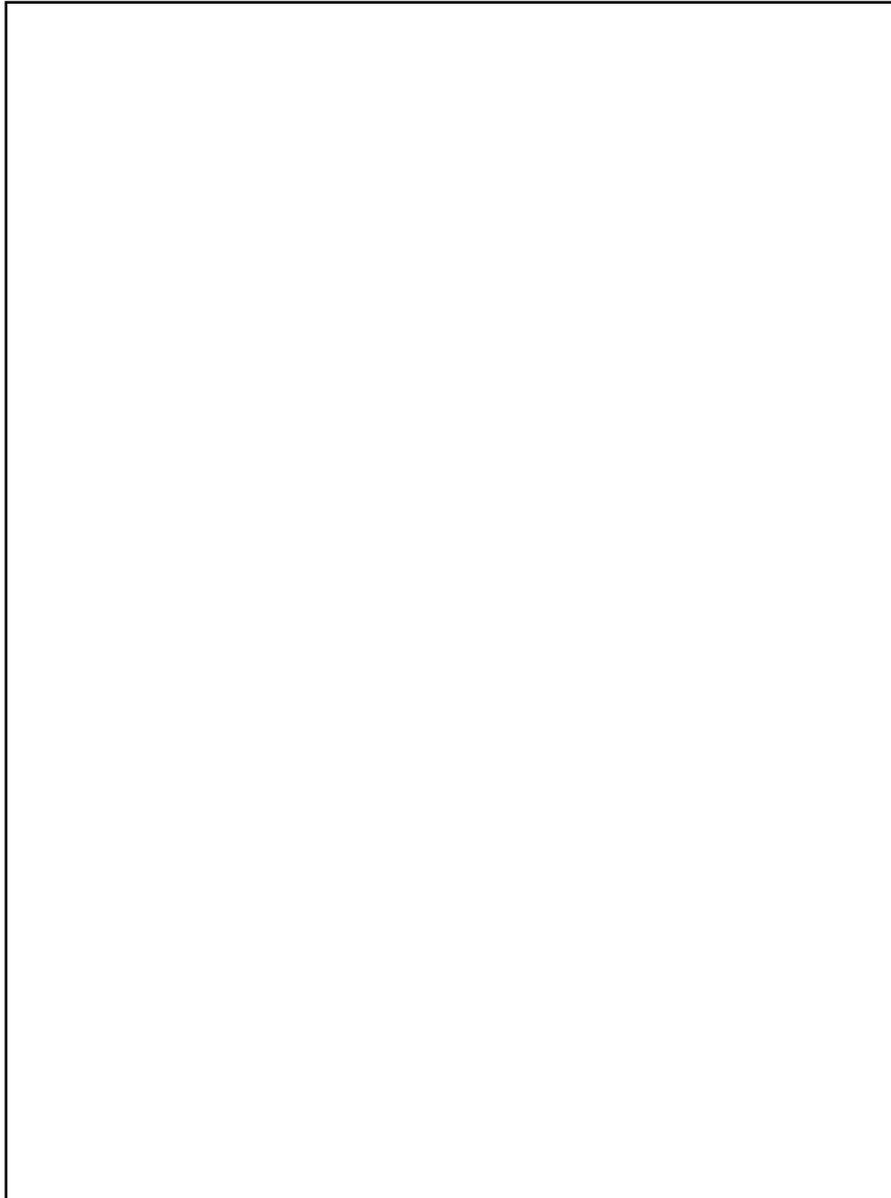
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 21.2

DHS acknowledges commentor's statement that safety at the NBAF is not guaranteed. DHS also notes that the risk of an accidental release of a pathogen from the NBAF is extremely low. 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. 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 based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. 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. For example, 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. 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. It has been shown that modern biosafety laboratories can be safely operated in populated areas. 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.

Comment No: 3 Issue Code: 15.2

DHS notes the commentor's concerns. The risk of a pathogen release from the proposed NBAF at each of the proposed sites was evaluated in Section 3.14 of the Draft EIS and was determined to be low for all sites. As described in Section 2.3.1, DHS's site selection process including site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. Nevertheless, 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. The potential effects to livestock-related industries are



discussed in Appendix D and Section 3.10.9 of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a ban on all U.S. livestock products until the country was determined to be disease-free. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

Haymore, Todd

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MD0113



COMMONWEALTH of VIRGINIA
Department of Agriculture and Consumer Services
 PO Box 1163, Richmond, Virginia 23218
 Phone: 804/786-3501 • Fax: 804/371-2945 • Hearing Impaired: 800/828-1120
 www.dacs.virginia.gov

August 14, 2008

Todd P. Haymore
Commissioner

Mr. James V. Johnson, Director
Office of National Labs
U. S. Department of Homeland Security
Washington, DC 20528

Dear Mr. Johnson:

1| 1.0 Virginia is concerned with the need to conduct meaningful and necessary research
 2| 23.0 on animal diseases and the ability to conduct the appropriate research in an environment
 3| 24.1 that is safe from both an animal health and a public safety perspective. I acknowledge
 that it may be possible to design facilities and institute protocols that allow scientists to
 handle highly infectious organisms in locations that are in close proximity to both
 animals and people. However, I encourage you to consider upgrading and constructing
 the new National Bio and Agro Defense Facility at the Plum Island Site on Plum Island,
 New York, because the United States Department of Agriculture has demonstrated its
 ability to contain highly infectious organisms on the island over all the years that it has
 conducted research and training on the island.

The physical separation of an island facility forces all movement to and from the
 facility to be more deliberate and more easily monitored than would be likely for a
 similar physical facility located on a mainland site. I also encourage you to continue to
 take advantage of this geographic separation provided by the island when making your
 final decision on the location of a facility designed to deal with the most infectious
 organisms known that may accidentally or intentionally be released into our animal
 populations.

Equal Opportunity Employer

Comment No: 1 Issue Code: 1.0

DHS notes the commentor's concern about the mission of the NBAF and the risk to health and safety from the NBAF operation. Chapter 1, Section 1.1 of the NBAF EIS identifies DHS's mission as the study of foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal or benefit 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. 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 with a minimal degree of risk, regardless of the site chosen.

Comment No: 2 Issue Code: 23.0

DHS notes the commentor's statement and concern for locating NBAF on a mainland site. 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: 3 Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative.

Haymore, Todd

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MD0113

James V. Johnson
August 14, 2008
Page Two

Thank you for the opportunity to comment on the proposed locations for the new National Bio and Agro Defense Facility.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Haymore', with a long horizontal line extending to the right.

Todd P. Haymore
Commissioner

cc: Donald G. Blankenship, Deputy Commissioner
Richard L. Wilkes, DVM, Director, Division of Animal and Food Industry Services
Roy Seward, Manager, Policy and Research

Headley, Todd

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WD0082

From: Todd Headley [REDACTED]
Sent: Thursday, July 17, 2008 11:57 AM
To: NBAFProgramManager
Subject: KEEP YOUR BIO-TERROR LAB OUT OF ATHENS,GA!!

- 1|25.2 My name is Todd Headley and I am writing you to say I do not support the establishment of the proposed Bio-terror lab in Athens,GA. I live very close to the proposed site off of College Station road, and it is amazing to me that the government would even consider moving the such a dangerous facility from a contained island (Plum island) to a highly populated urban area such as Athens,GA. I have kept up with town meetings and office of Gov't Accountability findings, and I quite honestly feel that the true risks are being swept under the rug constantly. The DEIS lists numerous issues such as possible vectors (ticks, mosquitos), availability of water for the facility, proximity to wildlife/humans/vegetation, etc. Let's not forget that Athens,GA has been in a severe drought for the past couple of years. We have come very close to running out of drinking water, yet you propose we allow this dangerous facility to use over 40,000,000 gallons of water per year in addition...THIS IS A VERY RIDICULOUS AND IRRESPONSIBLE IDEA!! Let the point be made that this facility is also not going to provide Athens with very many jobs at all!! The last estimate I read was less than a total of 70 jobs would be gained for Athens residents, with over 230 people being brought in from elsewhere. Don't bullshit us anymore. We are sick of it and would like you to take your Bio-Terror lab and shove it! Take it to Kansas or better yet LEAVE IT ON AN ISLAND DUMBASS. We are tired of the government telling us lies, and Athens,GA will not stand for such irresponsibility and downplaying of such a serious proposal.
- 2|21.2
- 3|12.2
- 4|15.2
- 5|5.0

Todd Headley
 [REDACTED]

Stay in touch when you're away with Windows Live Messenger. [IM anytime you're online.](#)

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: 21.2

An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native insect populations was evaluated in Section 3.8.9 and Section 3.10.9 as well as in Section 3.14.

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's concerns regarding safe facility operations. 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 is addressed in Sections 3.8.9, 3.10.9, and 3.14.

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 3.3.3.3.1, there is adequate capacity of 43,000,000 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: 4 Issue Code: 15.2

DHS notes the commentor's statement regarding employment. Section 3.10.3 of the NBAF EIS discusses the potential effects on the socioeconomic conditions of the region encompassing the South Milledge Avenue Site. The number of potential short-term and permanent jobs are discussed in Section 3.10.3.2.1. The number of temporary jobs from construction of the NBAF would be 2,642 (person-years) and would generate \$150 million. Approximately 483 permanent jobs, including the initial 326 direct jobs, would result from operation of the NBAF, with much of the scientific work force relocating to the region.

Comment No: 5 Issue Code: 5.0

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

Headley, Todd

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WD0872

From: Todd Headley [REDACTED]
Sent: Monday, August 25, 2008 11:06 PM
To: NBAFProgramManager
Subject: NO BIO-TERROR LAB IN ATHENS!!!

1| 25.2

I am writing to express my vote for no bio-terror lab. Let's put it to a vote! This should be the choice of Athens, GA citizens, and not a forceful installment of a NEEDLESS BIO TERROR LAB within the populations center. The DANGER IS TO GREAT. KEEP IT ON PLUM ISLAND>>DON'T FIX IT IF IT AIN'T BROKE! I find it very interesting that the Dept. of Homeland Security conducted most of the public discussions during the least populated time of the year here in Athens. UGA College students don't want to be worried with the myriad of dangers associated with the lab either. TAKE YOUR LAB SOMEWHERE ELSE PLEASE...KANSAS IF YOU INSIST ON THE MAINLAND. That was a pretty weak EIS as well.

With Concern,

Todd Headley

Get ideas on sharing photos from people like you. Find new ways to share. [Get Ideas Here!](#)

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative and support for the Plum Island Site Alternative.

Hedlund, Cathy

Page 1 of 1

WD0830

From: [REDACTED]
Sent: Monday, August 25, 2008 6:31 PM
To: NBAFProgramManager
Subject: Petition

1 | 5.4 | I am writing to strongly urge that the National Bio and Agro-Defense Facility be awarded to the
2 | 8.4 | Manhattan, Kansas site. This area of the country is well versed in the requirements and need for
such a facility and can support a quality program.

Thank you,
Cathy Hedlund

Comment No: 1 Issue Code: 5.4

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

Comment No: 2 Issue Code: 8.4

DHS notes the commentor's statement.

Hedrick, Haley**Page 1 of 1**

WD0386

From: Haley Hedrick [REDACTED]
Sent: Tuesday, August 19, 2008 9:41 PM
To: NBAFProgramManager

1|25.3; As a North Carolinian, I do not agree with the placement of the National Bio- and Agro- Defense
2|5.0 Facility in my state, or in my country to be honest. Of course it is dangerous pathologically, but
it is also not even economically viable for NC. The outsourcing of jobs will be prevalent in this
case, and besides that, in the case of an accident/emergency, the economic consequences can run
2 cont. into the BILLIONS of dollars! Please do not support the placement of the NBAF in my beautiful
5.0 state of NC, and if possible please have the sense to cancel it's placement altogether.

Thank

Comment No: 1 Issue Code: 25.3

DHS notes the commentor's statement regarding employment. The economic effects of the NBAF at the Umstead Research Farm Site are presented in Section 3.10.7 of the NBAF EIS. The proposed action would create temporary jobs during the 4-yr construction phase and permanent jobs upon completion of the facility. Section 3.10.7.2 states that the majority of the construction workers would be employed from the immediate area or would commute from the surrounding counties. Upon the facility's completion, permanent employees would include scientific and support staff, as well as operations, maintenance and security staff as described in Section 3.10.7.3. Because many jobs at the NBAF would be highly specialized, it is anticipated that the majority of the employees would relocate to the four-county region from elsewhere in the country. In addition, household spending by these new residents and the operations of the NBAF would likely create job opportunities that would be filled by the local labor force

Comment No: 2 Issue Code: 5.0

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

Heesacker, Amy

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CD0501

From: [REDACTED] Amy Heesacker [REDACTED]
Sent: Thursday, July 31, 2008 9:54 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 13.2 | The DEIS seems to gloss over the effect of NBAF on the environment of the State Botanical Garden and Important Bird Area in Athens, GA.

2| 15.2 | Will the Final EIS correct this deficiency? Is the quality of life of Athenians not important to the DHS?

My husband and I chose [REDACTED] to raise our children due in part to the outdoor amenities that it provides, including the State Botanical Gardens which we enjoy as a family together. If NBAF becomes a part of our community we will not feel safe raising our family here.

3| 25.0 | I am strongly opposed to NBAF.

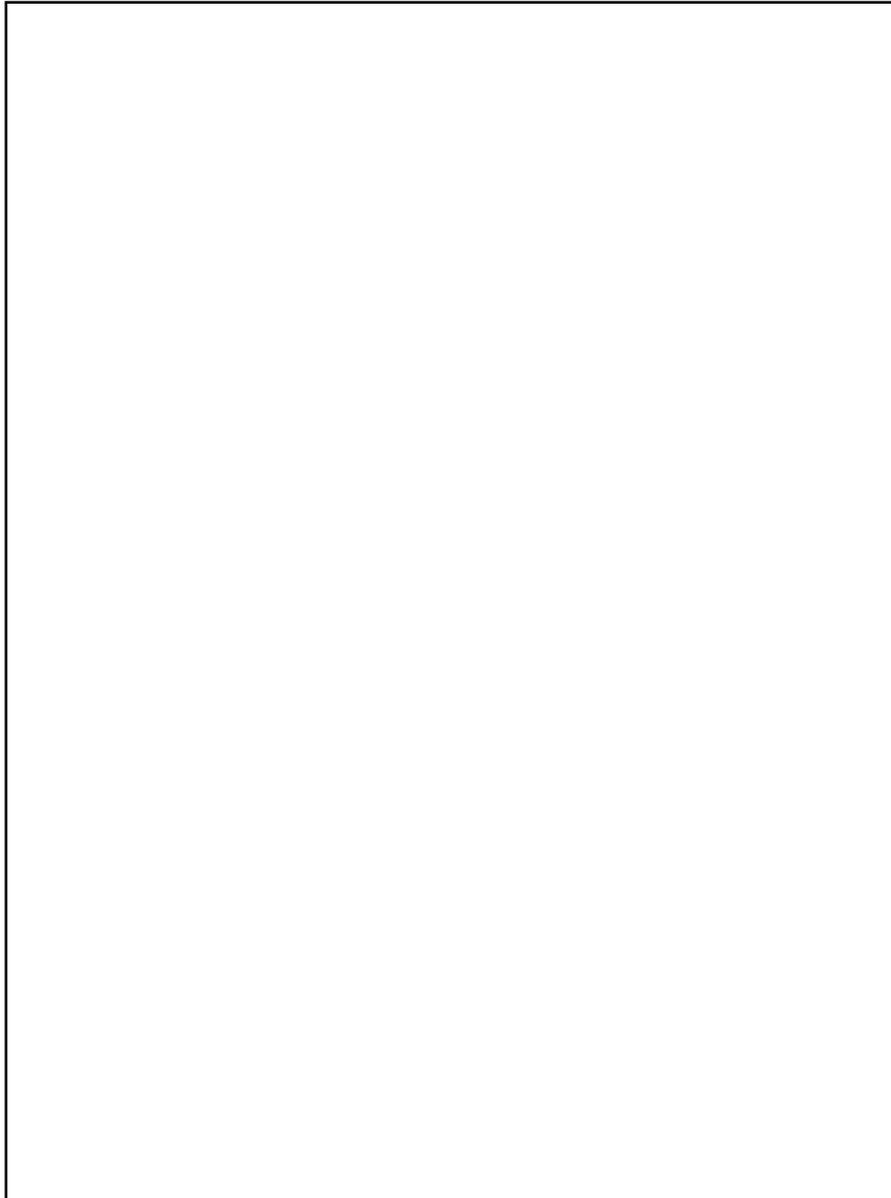
Sincerely,
 Dr. Amy Heesacker

Comment No: 1 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the Botanical Garden and the 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 South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with the Whitehall Forest 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 proposed NBAF would not have significant direct impacts on wildlife dispersal between the Botanical Garden and the Whitehall Forest IBA. 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. Mitigation measures, such as the use of shielded lighting, 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 mitigative 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 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: 2 Issue Code: 15.2

DHS notes the commentor's concerns regarding potential impacts to quality of life. Section 3.10.3 of the NBAF EIS discusses the socioeconomic of the region encompassing the South Milledge Avenue Site including quality of life and recreation resources and potential impacts from siting NBAF.



Adverse effects to quality of life resources would not be expected under any of the site alternatives as discussed in Section 3.10 of the NBAF EIS.

Comment No: 3

Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF.

Heigl, Tom

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PD0020

July 21, 2008

Yeah, hi,

1| 25.1 | This is Tom Heigl calling. I wanted to voice my opposition to the Plum Island upgrade to a BSL-4 facility. One of the reasons is that consideration of the evacuation plan - my
2| 21.1 | understanding is that the east end has got a "hunker down" policy, which means no one's
3| 15.1 | coming to get anyone in case of a disaster.

2 cont.| 21.1 | Well what would happen if there was a disaster, or even a scare of a disaster on Plum
3 cont.| 15.1 | Island? Every single person from the east end would be on the Long Island expressway
and having a traffic jam probably from the east end right through Manhattan and
basically leave the entire island in complete chaos and/or should it be an actual
emergency, leaving everybody on the island to die.

6| 5.0 | I just think....I think it's a bad idea and I think the facility could be housed elsewhere or
several other places and achieve the same goal.

4| 5.1 | Personally, I think what they should do is they should decommission the animal studies
out on Plum Island and look into the concept of perhaps using plum (inaudible) to
5| 27.0 | generate hydro power and re-purpose the facility on Plum Island to generate non-fossil
fuel oriented power.

Have a nice day.

Bye, bye.

Comment No: 1 Issue Code: 25.1

DHS notes the commentor's opposition to the Plum Island Site Alternative.

Comment No: 2 Issue Code: 21.1

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. 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. 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. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, 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. 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. 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. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Plum Island Site Alternative is provided in Section 3.11.6 of the NBAF EIS. An emergency response plan, which would include area evacuation plans, would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations. Emergency response plans will include the current USDA emergency response plan for foot and mouth disease (FMD) which includes compensation for livestock losses. Evacuation would not be needed with FMD release, since FMD is not a public health threat.

Comment No: 3 Issue Code: 15.1

DHS notes the commentor's concern regarding evacuation due to an accident occurring at Plum Island. An emergency response plan that would include area evacuation plans would be developed if

one of the action alternatives is selected and prior to commencement of NBAF operations. The need for an evacuation under an accident conditions is considered to be a very low probability event. Evacuation would not be needed in case of an accidental release of FMD because FMD is not a public health threat. Cats, dogs, birds and other non-cloven hooved household pets are also not affected by FMD.

Comment No: 4 Issue Code: 5.1

If the Plum Island Animal Disease Center is decommissioned, DHS would determine alternatives regarding its future use and would perform a separate NEPA analysis at that time.

Comment No: 5 Issue Code: 27.0

DHS notes the commentor's statement on an alternate use for Plum Island. If the Plum Island Animal Disease Center is decommissioned, DHS would determine alternatives regarding its future and would perform a separate NEPA analysis at that time.

Comment No: 6 Issue Code: 5.0

DHS notes the commentor's opposition to the Plum Island Site Alternative.

Henderson, Genette

Page 1 of 1

WD0710

From: [REDACTED]
Sent: Monday, August 25, 2008 11:59 AM
To: NBAFProgramManager
Subject: Opposition to siting in NC

1|25.0 We are adamantly opposed to the siting of the NBADF in Butner, NC or any of the
 2|12.3; proposed sites due to, among others, the potential contamination of Falls Lake and
 3|2.0; other drinking water sources with dangerous pathogens; the lack of transparency of
 4|19.3 operations or monitoring for disease releases; the inability to manage more than 8000
 local hospital patients and prisoners in the event of evacuation or quarantine.

5|25.3 Please do not site it here or anywhere in NC. Genette Henderson

[Get the MapQuest Toolbar](#), Directions, Traffic, Gas Prices & More!

Comment No: 1 Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF.

Comment No: 2 Issue Code: 12.3

DHS notes the commentor's watershed and water contamination concerns. The NBAF EIS Section 3.13.8, Waste Management describes the process that would be used to control and dispose of liquid wastes and Sections 3.3.7 and 3.7.7 describes standard methods used to prevent and mitigate potential spill and runoff affects through implementation of SPCC and SWPP plans.

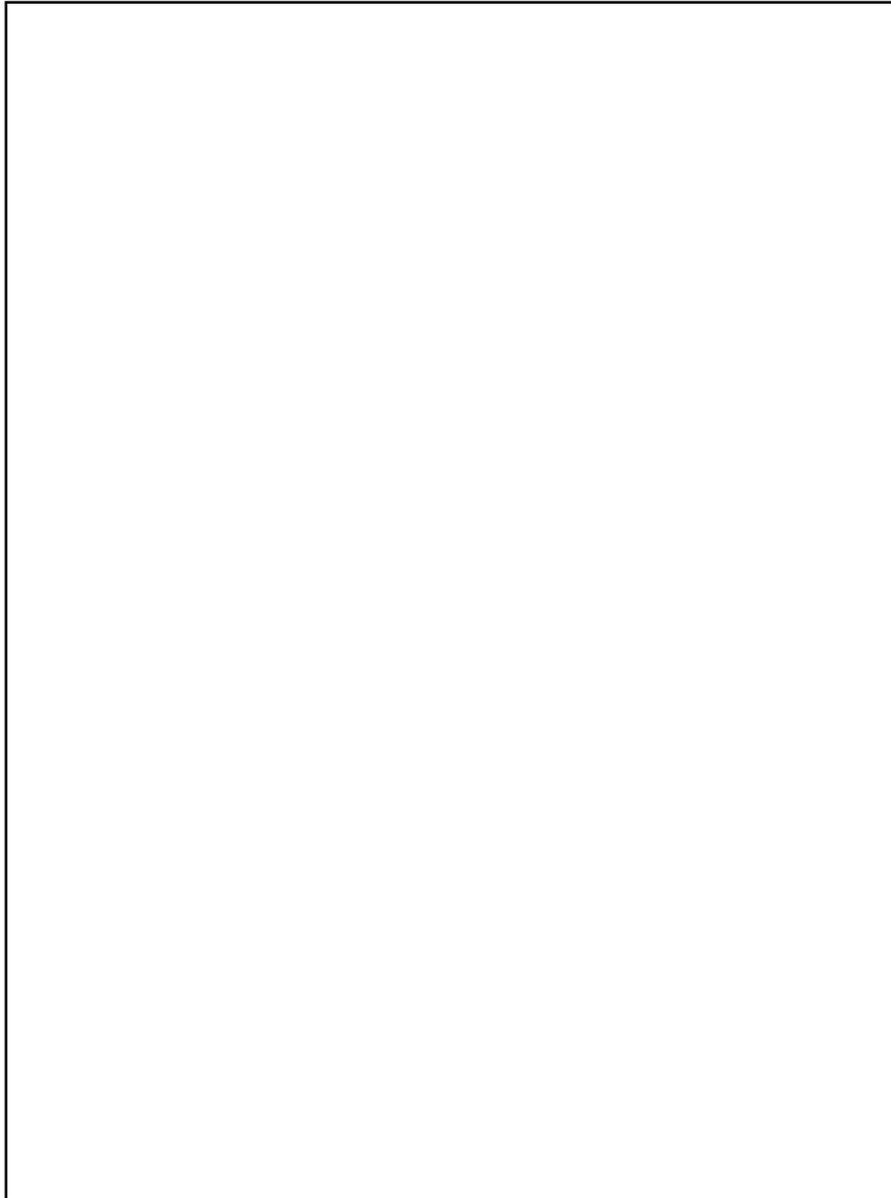
Comment No: 3 Issue Code: 2.0

DHS notes the commentor's questions regarding the public availability and transparency of NBAF research. There would no classified research at the NBAF, however there may occasionally be classified FBI forensics cases. Currently, the PIADC facility publishes research in publicly available research journals; NBAF would publish its research in publicly available research journals as well.

DHS also notes the commentor's concern with monitoring for disease releases. DHS would have site-specific standard operating / monitoring procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. In addition, 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.

Comment No: 4 Issue Code: 19.3

DHS notes the commentor's concerns regarding an accident and the impact to institutionalized populations. 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. 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, The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, 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. 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. 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.

Comment No: 5

Issue Code: 25.3

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

Henderson, Shirley

Page 1 of 1

PD0211

August 22, 2008

1|25.0

This is Shirley Henderson in ██████████ Kansas and I own a cow herd. And I do not think that would be a good idea to put the bio lab anywhere in the United States.

Thank you.

Comment No: 1

Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF.

Hendrick, Haley

Page 1 of 1

WD0841

From: Haley Hedrick [REDACTED]
Sent: Monday, August 25, 2008 7:38 PM
To: NBAFProgramManager
Subject: NBADF

¹5.3 | Please keep the lab out of NC, and it would be lovely if it was off the mainland or not in our
²5.0 | nation period!

Comment No: 1 Issue Code: 5.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives.

Hendrix, Pamela Lohr

Page 1 of 2

GAD002



National Bio and Agro-Defense Facility Draft Environmental Impact Statement Comment Form

Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.

Name: Pamela Lohr Hendrix

Title: _____

Organization: concerned individual

Address: _____

City: _____ State: GA Zip Code: _____

Comments: I have two main concerns about locating the National Bio Lab in Athens, Georgia :

① In the event there was an accident, residents' pets and animals could have to be killed to stop the spread of disease. This sounds far-fetched but I have personally experienced losing animals in a government-mandated "kill zone." My family has a farm in Colorado. When my two boys were three and five, my father (their grandfather) invested in a domestic elk-farming operation on their behalf. They received pictures of "their" elk and twice in the summers we visited "their" elk at the farm. That next fall, chronic wasting disease was discovered in the local mule deer population, and a "kill zone" was ordered. My sons' elk were put down by the government! Imagine having to tell your boys that the government made us kill their elk. Interestingly enough, the elk were all tested for the disease after they were killed and none of the elk tested positive.

(Continued on back for your convenience)

If there was an accident at this Bio Lab, people could lose

NATIONAL BIO AND AGRO-DEFENSE FACILITY
 Science and Technology Directorate/Office of National Laboratories

Comment No: 1 Issue Code: 21.2

DHS notes the commentor's concern that the accidental release of a pathogen such as foot and mouth disease (FMD) from the NBAF operation would require the euthanasia of household pets to prevent the spread of the disease. FMD is not a health threat to human populations, nor would cats, dogs, birds and other non-cloven hoofed household pets be affected by FMD. 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. 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. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, 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. 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. 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.

Comment No: 2 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.

Hendrix, Pamela Lohr

Page 2 of 2

GAD002

Cont | 1 | 21.2

their pets or farm animals. (Of course, compensation was paid for our elk, but money does not replace beloved animals.)

2 | 12.2

(2) I am also concerned about the large amount of water this Bio-Lab will require. Right now we are experiencing a severe/extreme drought here in Georgia. This Fall is drier than last. A little creek near my boys' school (Westminster Christian Academy) is dry this year and was never dry last year. This may be only a drought cycle but it could also be our new "normal" in this area. If so, we cannot continue the business and residential growth of years' past. There will simply not be enough water.

Pamela Lohr/Hendrix
8/14/08

THANK YOU FOR YOUR COMMENTS

Please return this form to the comment table. It may also be mailed or faxed as follows:

U.S. MAIL

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

TOLL-FREE FAX

1-866-508-NBAF (6223)

Henricks, Vernon

Page 1 of 1

WD0620

From: Vern Henricks [REDACTED]
Sent: Saturday, August 23, 2008 12:15 PM
To: NBAFProgramManager
Subject: Loacte to Manhattan, KS

To Whom It May Concern:

1|24.4; It is my pleasure to send you this email encouraging you to select Manhattan, KS for your NBAF site. We moved to Manhattan in 1997 and have found this community to be a wonderful part of our lives. The youth activities and educational opportunities are outstanding in this community. Many will encourage you to move here because of the work being preformed within the walls of the facility. I'm send you this message to share that one of the greatest strengths of selecting Manhattan is for employee happiness and retention.

2|8.4 As an administrator, consultant, and parent, I understand the amount of lost time and revenue that results from the constant recruiting of professionals. This community has been a wonderful place for professionals and their families to live. When people know their families are safe, involved and happy, it is much easier for them to focus on their efforts at work—making performance much greater. Every employee will be able to live within fifteen minutes of work. This will give you the opportunity to recruit and retain some of the best professionals, because they can also be involved in the lives of their families.

1Cont.|24.4 Think about this seriously, because it won't make any difference where you build this facility if can't be used at its highest performance levels. And I think that is Manhattan, Kansas.

Vernon J. Henricks - [REDACTED]
Vice President for Institutional Advancement, Manhattan Christian College
President, The Henricks Group
President, The Youth Leadership Foundation
President, Manhattan Sports Academy

The more proactive you are, the less reactive you'll need to be! -- Eric Harvey and Paul Sims

Comment No: 1 Issue Code: 24.4

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

Comment No: 2 Issue Code: 8.4

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

Henry, Pamela

Page 1 of 1

PD0191

August 22, 2008

1| 24.4 | My name is Pamela Henry. I work for [REDACTED] and I support NBAF in Kansas.

Comment No: 1 Issue Code: 24.4

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

Hensley, Anthony

Page 1 of 1

MD0029

ANTHONY HENSLEY
STATE SENATOR, NINETEENTH DISTRICT
SHAWNEE, DOUGLAS & OSAGE COUNTIES

HOME ADDRESS:
2226 S.E. VIRGINIA AVENUE
TOPEKA, KANSAS 66605-1357
(785) 232-1944—HOME

E-MAIL:
HENSLEY@SENATE.STATE.KS.US
INTERNET:
WWW.KANSASSENATEDEMOCRATS.ORG

State of Kansas
Senate Chamber



Office of Democratic Leader
ROOM 347-N, STATE CAPITOL
TOPEKA, KANSAS 66612
(785) 296-3245
FAX (785) 296-0103

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TTY-(785) 296-8430

August 10, 2008

Mr. James Johnson
DHS Science and Technology Directorate
245 Murray Ln. SW, Bldg. 410
Washington, DC 20528

Dear Mr. Johnson:

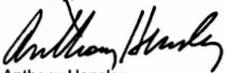
With deep ties to agriculture, medical and veterinary science expertise, strong public support, and central location, Kansas offers a number of inherent strengths that would benefit the new National Bio- and Agro-Defense Facility (NBAF).

1| 24.4 Kansas is blessed with the right kind of scientific assets, and nationally recognized expertise in animal diseases, making it extremely well-suited to oversee the safety and security of our state's and nation's food supply. As the premier bio-security research laboratory in the country, our researchers would help stop the world's most complex human and animal diseases, including potential biological attacks by terrorists and deadly outbreaks, such as foot-and-mouth disease.

Locally, Kansas have embraced the NBAF as part of an urgently needed effort to modernize homeland security facilities and research to ensure public health.

Kansas is poised to answer this important national challenge and I believe we should make every effort to attract NBAF to Kansas. Feel free to contact me at (785) 296-3245 should you have any further questions regarding my support for this vital facility.

Sincerely,



Anthony Hensley
Senate Democratic Leader

cc: Tom Thornton

Comment No: 1

Issue Code: 24.4

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

Hensley, Sheila

Page 1 of 2

WD0182

From: Sheila Hensley [REDACTED]
Sent: Tuesday, August 05, 2008 12:21 PM
To: nbafprogrammanager@dhs.gov
Subject: NO TO THE NBAF in NC

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

Dear Directorate Johnson:

1| 20.3 The Department of Homeland Security (DHS) plans to build a new research facility, the National Bio- and Agro-Defense Research Facility," or NBAF. The Umstead Research Farm in Butler, NC is one of six locations on the final national list. It is not only proposed for an area with a large number of humans who are unable to locate (Butner Prison, John Umstead Hospital, etc.) but is also 30 miles from Raleigh, NC and Research Triangle Park, home to millions. I was shocked to find out this may come to our area and the risk that it imposes to our water supply & our personal health.

2| 12.3
 3| 19.3
 4| 25.3 Given the possible risks to the vulnerable population in Butler, as well as risks to those in Raleigh and RTP among others – I strongly oppose the placement of the NBAF in GranvilleCounty at the Umstead Farm. My understanding is that even 30 miles distance poses a huge risk based on the fact that treated waste from the site will be released into lakes and reservoirs that provide water to Raleigh and surrounding towns.

2 cont.| 12.3 Some of the reasons for my decision are:

5| 21.3 The proposed facility would store, handle and perform research on numerous organisms that the Dept. of Homeland Security acknowledges can be dangerous if they were to escape to the surrounding environment, and anticipates working with organisms that will require a higher level of containment than currently exists at the Plum Island Facility in New York.

3 cont.| 19.3 • The proposed facility is intended to have the highest level bio-containment ("BSL-3 and BSL-4") to accelerate and expand the study of plant, animal and zoonotic diseases. Although the facility will be designed to reduce all known risks, many of the diseases to be studied can be transmitted to people.

6| 18.3 • The ongoing laboratory waste stream would include animal remains, laboratory equipment, paints, disinfectants, chemicals, biological waste, and radiation. Some waste would be burned, and other waste would be buried.

6 cont.| 18.3 • The EPA has found that even state of the art, dry-tomb landfills fail, leach their contaminated contents into the environment as gases are released and as rainwater and groundwater enter and exit the landfill, carrying contaminants with them. All systems are vulnerable to human error and unforeseen events.

3 cont.| 19.3 • Over 100 accidents were "reported" in high containment labs over the past 4 years (90% caused by human error).

Comment No: 1 Issue Code: 20.3

DHS notes the commentor's concern. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the EIS. The risks were determined to be low for all site alternatives. A site-specific emergency response plan would be developed and coordinated with the local emergency management plan and individual facility plans regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF, and which would include stipulations for all special-needs populations.

Comment No: 2 Issue Code: 12.3

DHS notes the commentor's watershed concern. The NBAF EIS Section 3.13.8 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. The NBAF EIS Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects..

Comment No: 3 Issue Code: 19.3

DHS notes the commentor's concern about the risk to health and safety from the NBAF operation. 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 with a minimal degree of risk, regardless of the site chosen. 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 a 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: 4 Issue Code: 25.3

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

Comment No: 5 Issue Code: 21.3

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. 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. 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. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, 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. 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. 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.

Comment No: 6

Issue Code: 18.3

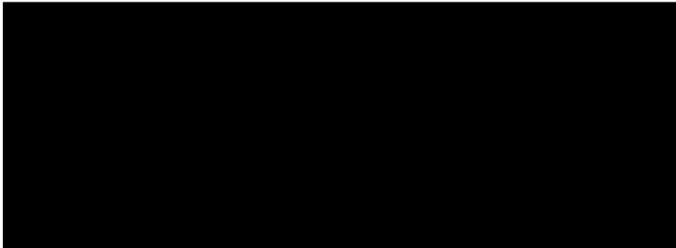
DHS shares the commentor's concern about wastes and accidental releases. All of the potentially infectious waste generated at the proposed NBAF, however, would have to undergo onsite pretreatment before it could be released from the facility for additional treatment and, or disposal offsite. EIS Section 3.13 discusses waste management issues associated with construction and operation of the NBAF. Waste issues specifically associated with the Umstead Research Farm Site in North Carolina are considered in Section 3.13.8. Appendix E (Accidents Methodology) evaluated accidental releases of contaminated wastes. Table 3.13.2.2-2 lists the types of wastes ultimately destined for a sanitary sewer that could be generated at the facility. The table also shows the pretreatment that would be applicable to each of these waste streams to destroy infectious constituents. Similarly, Table 3.13.2.2-3 lists the types of waste solids that could ultimately be destined for a solid or hazardous waste management facility. The table also shows the pretreatment that would be applicable to these waste streams to destroy infectious constituents.

Hensley, Sheila

Page 2 of 2

WD0182

4 cont. | 25.3 | Given all of these factors I urge you to oppose the placement of the NBAF in North Carolina.
Sincerely,
Sheila Hensley



Hepburn, Lawrence R and Mary A

Page 1 of 3

WD0438

From: L. Hepburn [REDACTED]
Sent: Wednesday, August 20, 2008 10:13 PM
To: NBAFProgramManager
Subject: Public Comment on Athens, GA Site

1| 4.2 We are retired faculty members of the University of Georgia who have lived in the Athens area for 38 years. We read about the proposal to build a national "bio and agro-defense" facility here. So along with hundreds of other Athens residents we attended one of the two NBAF public hearings on August 15. This was a poor time for community input. Many residents had not returned from summer vacations, and those just returning as well as students newly arriving were not aware of the hearings on the issue of their own safety.

2| 1.0 The hearing provided useful information. We learned about the purpose of such facilities, its structural features, and advancements in biological and agricultural defenses that a new facility is designed to provide. One cannot argue with its purposes. Clearly such a research facility is needed in the U.S. Location, however, is a prime concern – not only for the convenience of DHS and scientists who will work there but also for the safety of the public that this lab is meant to benefit.

3| 6.2 We think a serious error has been made by The University of Georgia and Athens-Clarke County authorities in offering for NBAF a site in Athens-Clarke County on Milledge Avenue alongside the State Botanical Gardens. This site is less than three miles west of extensive residential and retail commercial development. Stretching just three to four miles east of this site are residential subdivisions – University Heights, Green Acres, Cedar Creek, Ashton Place, Crestwood, Snapfinger, Carrington Plantation to name a few – which house thousands of families. Serving these residential areas are three public elementary schools, a private elementary school, a public middle school, and a public high school. Hundreds of university student apartments, condos, and dormitory rooms are within three miles of the Milledge Avenue site.

4| 21.2 With respect to wind patterns, the proposed site is a poor choice. It is located along a weather path where strong winds and thunder storms regularly move west to east from Oconee County and Morgan County to the eastern residential part of Clarke County. This year alone in the Cedar Creek subdivision we've had at least ten tornado watches and several tornado warnings from storms moving along a path across the potential NBAF site into residential areas. Examining records of the National Weather Bureau shows this.

Lab damage by windstorms is a serious threat to the public. We note that the draft NBAF EIS states in Appendix E that based on high velocity missile tests "the proposed NBAF conceptual design is not expected to resist the effects of wind-blown missiles." (p. 145)

Comment No: 1 Issue Code: 4.2

DHS notes the commentor's concerns regarding the location and timing of the NBAF EIS public meetings held in Athens, Georgia. Upon completion of the NBAF Draft EIS, it was published without delay and public meetings were then scheduled in each of the communities being evaluated for siting the NBAF during the ensuing 60-day public comment period. DHS gave preference to holding meetings at locations in each community proximal to the proposed NBAF site and at appropriate meeting venues offering sufficient space to accommodate anticipated attendance levels. DHS recognizes that it is not possible to hold a public hearing at a time and place that is convenient to every interested person, and therefore provides alternate means of submitting comments to provide multiple opportunities to participate in the NEPA process. In addition to oral comment at the public meetings, 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 have been responded to in this NBAF Final EIS.

Comment No: 2 Issue Code: 1.0

DHS notes the commentor's statement regarding the mission of the NBAF.

Comment No: 3 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: 4 Issue Code: 21.2

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. 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.

DHS also notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. 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. 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. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, 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. 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. 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.

Hepburn, Lawrence R and Mary A

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5| 9.2 | Local wind patterns hold other potential risks at the Athens site. The draft EIS notes, "For all of the proposed sites, except Plum Island, NY, there was a potential for viral pathogens to be transported significant distances by the wind. The results of the modeling indicate that this transport pathway is not limited, as was the case for Plum Island. It is considered likely that deer, wild boar, and other wildlife or livestock could act to spread disease over long distances. In addition, common vectors such as mosquitoes, can be transported long distances." (p. E-161)

4 cont.| 21.2 |
6| 13.2 | With respect to insect-borne pathogens, the Athens site has an especially high risk potential from escaped infected mosquitoes. Athens-Clarke County features a relatively warm and humid climate, wetlands and woodlands, and as a consequence, a large resident mosquito population. It also has large livestock populations susceptible to mosquito-borne pathogens. The EIS notes, "With the exception of the proposed Plum Island NBA site location in NY, the other site alternatives are in population areas (high densities of people and animals) and the surrounding ecosystems that provide favorable environments to support pathogen spread and growth in the event of a release." (p. E-162)

7| 8.2 | In Athens-Clarke County, adequate water supply and sewage disposal are longstanding shortcomings. Requirements for water supply and waste disposal in a facility handling deadly pathogens and carcasses of diseased animals will place untoward demands on local public utilities of limited capacity. This site is in the heart of a drought area in which residential and commercial water usage is strictly limited by state law and local ordinance. It is also in an area where an historically inadequate county sewage system is only now beginning to undergo long-deferred rehabilitation to enable it efficiently to handle sewage loads generated by a residential population grown large over the last 40 years.

4 cont.| 21.2 | Human-error and infrastructure breakdown regarding this type of facility can have very serious consequences as we have seen in recent news about CDC in Atlanta and other DHS facilities. The likelihood of such errors and breakdowns are great enough to suggest that such facilities do not belong in or near residential areas.

8| 5.2 | In closing, we would like to point out that if the business and political leadership of Athens-Clarke County, and that of The University of Georgia are fixed on having a federal facility, it should look to the University's extensive land holdings nearby which would provide more suitable sites for NBAF. For example, the University holds a total of 1006 acres in Oglethorpe County, which is contiguous to Athens-Clarke and is within 30-minutes commuting distance of the main campus. Yet, it is a rural and far less densely populated area than the urbanizing area of the proposed site on Milledge Avenue.

9| 15.2 | Surely our community leadership should have expressed some of the concerns we raise about the Milledge Avenue site. We fear that state and local authorities have placed public safety low on their list of priorities. Development dollars seem to be their only interest. We are repeatedly told that many new jobs will be available in this facility, yet, the DHS spokesman at the public meeting made it clear that the federal agency would bring in its own scientists and professionals. Are local leaders as well as the public

Comment No: 5 Issue Code: 9.2

DHS notes the commentor's statement. Section 3.14 and Appendix E present the methodology, results, and conclusions related to the identification of potential hazards; the analysis of potential postulated accidents; and the evaluation of consequences associated with normal and abnormal NBAF operations. The identification of hazards includes operations with pathogens and other identified risks related to operation of a large high-biocontainment biosafety laboratory. The analysis includes specific evaluation of accidents with potential adverse consequences and intentional acts (perpetrated by adversaries such as terrorists, criminals, employees, extremists, etc.). The methodology took into account The National Academy of Sciences, Committee on Technical Input on Any Additional Studies to Assess Risk Associated with Operation of the National Emerging Infectious Diseases Laboratory, Boston University, National Research Council, letter report that discussed important considerations when developing a risk assessment. Much of that discussion was adopted for presenting the approach taken in the evaluation of potential health and safety impacts from operation of the proposed NBAF. Potential dispersion of pathogens due to wind patterns was included in the evaluation.

Comment No: 6 Issue Code: 13.2

DHS notes the commentor's concern regarding regarding an accidental release of a vector, such as a mosquito, from the NBAF, as well as potential wildlife impacts associated with an accidental release at 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. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections, vector escape and accidental releases. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. 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. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. 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. In addition, 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the South Milledge Avenue Site is specifically addressed in Section 3.8.9 and Section 3.10.9.1 as well as in Section 3.14.4.1 (Health and Safety). Section 3.10.9.1 discusses the relative suitability of the

regional climate of the South Milledge Avenue Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.3.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Comment No: 7 Issue Code: 8.2

DHS notes the commentor's concern regarding the impact of the NBAF operation at the South Milledge Avenue Site on the area's potable water infrastructure and general water resources. An evaluation of the impact from the proposed operation of the NBAF at the South Milledge Avenue Site Alternative on the potable water supply and infrastructure is located in Section 3.3.3 of the NBAF EIS. Based on planned improvements, no potable water infrastructure constraints have been identified for the South Milledge Avenue Site. In addition, an evaluation of the impact from the NBAF operation on the area's general water resources, to include surface water and groundwater, is located in Section 3.7.3 of the NBAF EIS.

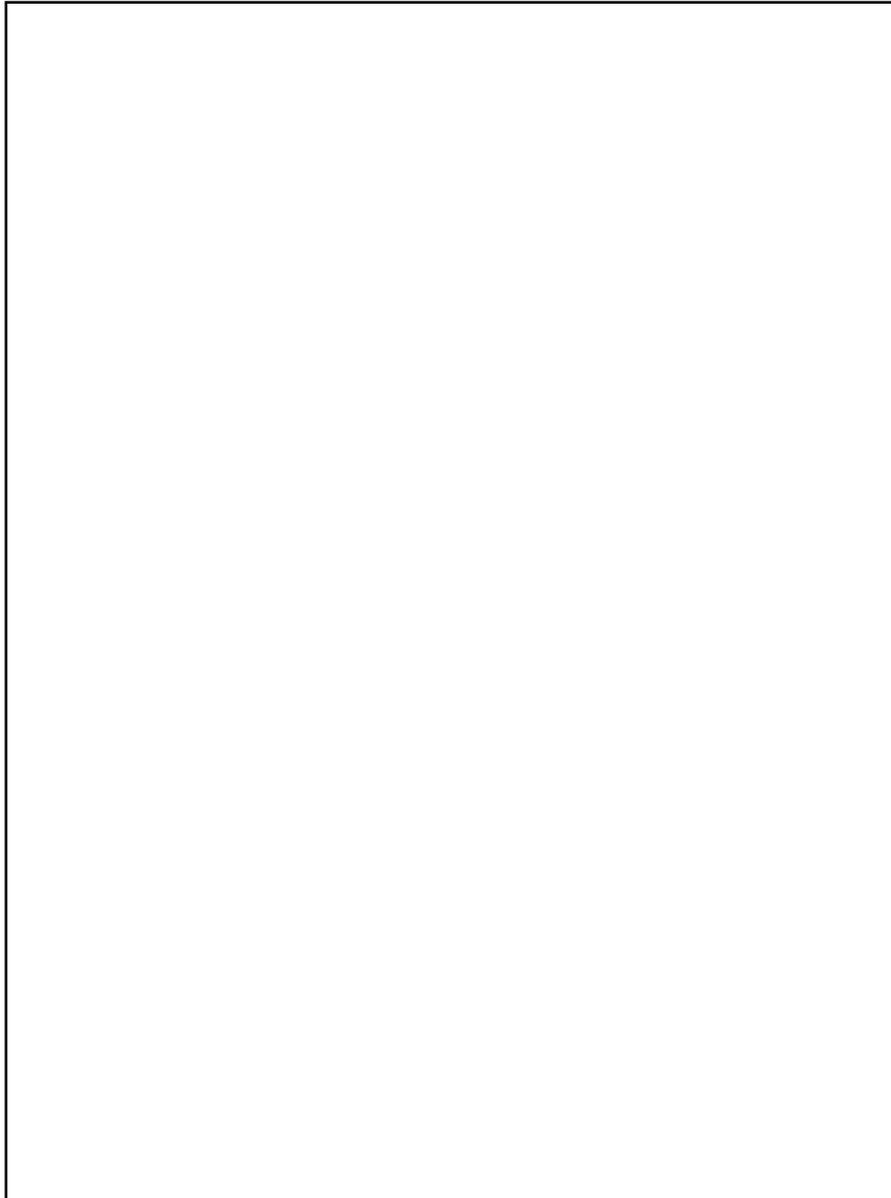
DHS also notes the commentor's concern about the Athens-Clarke County Public Utilities Department's ability to treat NBAF wastewater. The impact from the proposed operation of the NBAF at the South Milledge Avenue Site on the local sanitary sewage system capacity and infrastructure is discussed in Section 3.3.3.3.4 of the NBAF EIS. The design and operation of the NBAF at the South Milledge Avenue Site would prevent negative impact to the wastewater treatment facility infrastructure and treatment capabilities. Specifically, as summarized in Section 3.15 of the NBAF EIS, pre-treatment of liquid waste streams would be implemented as necessary to meet treatment facility acceptance criteria, therefore avoiding potential impacts.

Comment No: 8 Issue Code: 5.2

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 team of Federal employees representing multi-department component offices and multi-governmental agencies (DHS, U.S. Department of Agriculture [USDA], and Department of Health and Human Services [HHS]) 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: 9 Issue Code: 15.2

DHS notes the commentor's statement regarding employment. The economic effects of the NBAF at the South Milledge Avenue Site are included in Chapter 3, Section 3.10.3 of the NBAF EIS. The



proposed action will create temporary jobs during the four-year construction phase and permanent jobs upon completion of the facility. Chapter 3, Section 3.10.3.2 of the NBAF EIS states that the majority of the construction workers would be drawn from the study area or would commute from the surrounding counties. Upon the facility's completion, permanent employees will include scientific and support staff as well as operations, maintenance and security staff (Chapter 3, Section 3.10.3.3 of the NBAF EIS). Because many jobs at the proposed NBAF facility will be highly specialized, it can be expected that the majority of the NBAF employees would relocate to the region from elsewhere in the country. In addition, household spending by these new residents and the operations of the NBAF facility are expected to create job opportunities that would be filled by the local labor force.

Hepburn, Lawrence R and Mary A

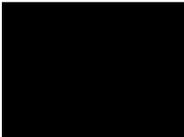
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WD0438

being duped?

Public protection, not economic development, is the first duty of government. The isolated offshore location of the existing Plum Island facility tells us that public safety was of paramount concern to scientists and government officers in siting that facility fifty years ago. Yet, only recently New York's two U.S. Senators oppose extending that facility or building a new one on Plum Island because of increased safety concerns associated with NBAF; it could endanger even populations who live across the water, but downwind, of the facility. Apparently, neither of Georgia's two U.S. Senators, nor other Georgia members of Congress, members of the Georgia General Assembly, or elected officers of Athens-Clarke County, have carefully considered similar potential dangers to people living in Athens-Clarke County.

Lawrence R. Hepburn and Mary A. Hepburn



Herles, Cecilia

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WD0149

From: [REDACTED] Cecilia Herles [REDACTED]
Sent: Friday, August 01, 2008 10:00 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1|25.2 | I am strongly opposed to NBAF in Athens, GA (and anywhere on the mainland).

How can this be an acceptable location, when you consider the sites' close proximity to the river? Erosion and sedimentation from the construction of such a large facility will have serious negative effects not only on the quality of the water, what little we have, but it will also threaten the wildlife of the surrounding areas.

2|6.2 | I am strongly opposed to NBAF in Athens, GA.
 We are a community proud of this site of beautiful pastoral lands, picturesque views, the State Botanical Gardens, and a nationally recognized birdwatching site.

3|12.2 | I am strongly opposed to NBAF in Athens, GA.
 We are a community struggling with a devastating drought, and the water usage from this facility is simply too much of a drain from this community's resources.

2 cont. | I am strongly opposed to NBAF in Athens, GA.
 6.2 | We are a community that does not want to change the land use, increase traffic along Milledge Ave., use up enormous amounts of energy, and create more hazardous waste and pollutants, adding to the waste and water systems that are already troubled in this community.

1 cont. | I have been a local resident in Athens, GA for over a decade. My family and I have made this place home. Like so
 25.2 | many others, we love the Botanical Gardens and this beautiful scenery and the best views of sunrises and sunsets in town as we drive on Milledge and Whitehall roads.

The thought of NBAF here instead, with all of this glaring lights, suffering animal test subjects, and armed guards keeps me awake at night.

Sincerely,
 Dr. Cecilia Herles

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: 6.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Chapter 3, 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.

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's drought concerns. As described in Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. Section 3.7.3.1.1 describes the potential potable water sources, the Middle and North Oconee Rivers and the Jackson County Bear Creek Reservoir.

Herrington, Robert

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WD0469

From: Herrington Robert [REDACTED]
Sent: Thursday, August 21, 2008 10:48 PM
To: NBAFProgramManager
Subject: NBAF belongs in Kansas...
Attachments: pastedGraphic.tiff, ATT580114.txt

Sirs:

1) 24.4

I am proud to say that the NBAF belongs in Kansas because of what Kansas and the Lab can do for the Nation.

We are Geographically located in the center of the Nation and secured by our neighboring States that make up the Bread Basket of the USA. Our Region understands the need for a safe food supply and we have the expertise and infrastructure right here to support such an important piece of the Nations Security. Kansas will be honored to serve and protect the security of the Nations Food Supplies as it is the root of our heritage.

Place the NBAF in good hands, place the NBAF in Kansas and know you have made the right choice.

Thank you for your consideration.

Sincerely,

Rob

[REDACTED]

Comment No: 1

Issue Code: 24.4

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

Hess, Eric

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WD0194

From: Eric Hess [REDACTED]
Sent: Tuesday, August 05, 2008 1:55 PM
To: NBAFProgramManager
Subject: Comment on NBAF Site Selection

Dear Mr. Johnson,

1|21.0 Please consider the following comments if DHS moves forward with building the NBAF on the continental US: Any state that is chosen for this effort must be able to demonstrate that EVERY county has planned and is ready to respond to and support a response to a FAD release. If the site is close to a state border, the coordination between the two states in preparedness and response must be demonstrated. I have worked with counties all counties in MO, NE, and AL; and many of the states, and I have found that this preparation and coordination does not exist to the level necessary to protect this critical infrastructure. As you are aware, state departments of agriculture get very little funding to secure this critical infrastructure, even in Kansas where millions have been spent on Ford County, little has been allocated to the remaining 104 counties. Thanks you for your time and consideration of my comments.

Sincerely,

Eric Hess

Comment No: 1 Issue Code: 21.0

DHS notes the commentor's concern that all State Counties surrounding the selected NBAF site have proper plans in place to respond to a foreign animal disease (FAD) release. 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, 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, 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. While the risk of an accidental release of a pathogen is extremely low, the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Manhattan Campus Site, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area, to include agricultural livestock. 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. Emergency response plans will include the current USDA emergency response plan for foot and mouth disease (FMD) which includes compensation for livestock losses.

Heyl, James and Nancy

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WD0073

From: James Heyl [REDACTED]
Sent: Monday, July 14, 2008 7:02 PM
To: NBAFProgramManager
Subject: NBAF proposal for Athens, GA

1| 25.2 | In addition to the questions of underrated risks in this location, I
 oppose it's location here because of water requirements.

2| 12.2 | Our local government's puzzling relaxation of water restrictions is
 irresponsible. The drought is not over, rainfall is as deficient this year
 just as last year, and long term predictions of climate change do not
 indicate relief. The estimates of water use by an NBAF lab are growing, and
 the control of water consumption through pricing is surely going to become
 necessary. Any estimates of the cost of operation using current water rates
 cannot be relied upon. Higher costs and rationing of water are almost sure
 events at this location. I would like to avoid this, and I'm sure you would
 too.

Dr. James Heyl, [REDACTED]
 [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: 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. The cost of potable water consumption was considered for each site alternative in the site cost analysis posted on the DHS website.