Hollander, Edith

Page 1 of 1

WD0313

From: [redacted] Edith P. Hollander [redacted]
Sent: Sunday, August 17, 2008 9:00 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1|25.2; 2|6.2; 3|4.0; 4|8.2; 5|2.0 I am strongly opposed to having NBAF in my community of Athens, GA. I do not feel the site is an appropriate choice, being too near a heavily populated area, the river, and the Bot gardens. I question the entire process of site selection, given the recent disclosures of impropriety in the process. I have serious concerns that this community can provide the infrastructure needed -- particularly water -- that a facility of this kind needs. I am concerned about the ability of the Homeland Security office to adequately and openly administer this facility to the benefit of those who live here. Thank you for including my responses in your community input report.

Sincerely,

Edith Hollander

[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: 6.2
DHS notes the commentor's concerns. As described in Section 2.3.1, DHS's site selection criteria 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 the NBAF. DHS also notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden and the Oconee River. As described in Section 3.8.3.1.1 of the NBAF EIS, 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. However, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden as indicated in Sections 3.8.3.2 and 3.8.3.3. Only minimal indirect effects would occur from operations due to increases in light and noise. As stated in Section 2.2.2.5, the NBAF would develop a Spill Prevention Control and Countermeasures Plan (SPCC) that specifies operating procedures to prevent spills, control measures to contain spills, and countermeasures to contain, cleanup, and mitigate the effects of a spill reaching a water body.

Comment No: 3 Issue Code: 4.0
DHS notes the commentor's concern. 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 (i.e., DHS, U.S. Department of Agriculture, and Department of Health and Human Services) 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: 4 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 upgrades outlined in Section 3.3.3.3.1, no potable water infrastructure constraints have been identified for the South Milledge Avenue Site. In addtion, 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.

Comment No: 5 Issue Code: 2.0

DHS notes the commentor's lack of confidence in the DHS and 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. 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 risks and associated potential effects to human health and safety were evaluated in Section 3.14 and Appendix E of the NBAF EIS. The risks were determined to be low for all site alternatives. 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.

Hollibaugh, James

Page 1 of 2

WD0044

From: James T. Hollibaugh [redacted]
Sent: Monday, July 07, 2008 11:16 AM
To: NBAFProgramManager
Cc: jaimelaplage@gmail.com
Subject: Errors in NBAF draft EIS

Dear Sir,

As an [redacted] (GA) resident, I have been interested in the development of the NBAF proposal for our site, a project that I generally support. I have read much of the draft EIS and have the following questions and comments as a result of my reading.

1|21.0 1) I was surprised that the plume model for the potential spread of pathogens gave circular patterns for the "fall-out" distribution (for all sites). Since any site inevitably has a prevailing wind direction, I would have expected a pattern that reflected the wind rose for each location. I looked carefully through the text and Appendix E to try to figure out why this may be, but it was not clear to me how the consultant arrived at this pattern, unless they assumed that wind speed = 0. Could you please explain to me why these patterns do not reflect the prevailing winds, which would increase the probability of receiving a MID in the down-wind direction and decrease it in the upwind direction?

2|21.0 2). I think there is something horribly wrong with the way your consultant calculated exposure to air-borne virons at various places in the EIS (Appendix E and in the risk assessment text). It appears that they correctly integrated exposure over time (actually area grazed) in the case of cows exposed to virons deposited on the ground, but (and I checked the math here twice), the exposure to air-borne virons seems to be based on a **one second** exposure.

It seems that the consultant used the breathing rate (L/sec) for cows to calculate exposure, but failed to multiply by the number of seconds that the cow would be breathing, so unless the cow died instantly (in one second) or was removed from the site instantly (in one second), the calculated exposure must be wrong, and by quite a lot. If it takes 4 hours to move the cows out of the plume (optimistic in the event of a disaster of the magnitude that would necessitate moving them in the first place), exposure would be 60 sec/min X 60 min/hr x 4 hr = 14,400 times greater than what the consultant calculated, which means that the area of land (and thus number of cows, etc) where cows would receive the MID of 10 virons would be much larger than calculated.

3|21.0 3) The consultants also incorrectly calculated the number of cattle in Clarke and Oconee Counties that would be exposed in the event of an unmitigated accident resulting in FMDV release. An example is on page 3-433, but this same erroneous calculation is repeated throughout the EIS.

Comment No: 1 Issue Code: 21.0
DHS notes the commentor's question regarding wind rose data not being presented in the NBAF EIS. While a wind rose was not presented the data obtained from the NOAA website referenced in the NBAF EIS contains the wind speed, direction, and rain fall events for each hour for an entire year. This is the form that the data needs to be in to use the MACCS2 dispersion code. This data could be presented in the form of a wind rose however, the raw data is more accurate presentation than a wind rose diagram, which has to be interpreted.

Comment No: 2 Issue Code: 21.0
The calculation for inhalation is not in fact based on a 1 sec duration because the concentration is presented in terms of s/m3. The ground concentration on the other hand is in units of pathogens per unit area, so the ingestion route has to be estimated by considering the total area covered by the animal. The entire accident release is on the order of 1 hour (therefore at a wind speed of 1 meter per second the down-wind distance traveled would be on the order of 3,600 meters or 3.6 km). The modeled results were extrapolated out to distances of 10 km because that is the limit of the dispersion model used.

The MACCS2 code is designed to estimate accident consequences and as such is a time-integrated model of the Gaussian Plume. The net result is that the concentration estimates represent the 95% confidence limits for the specified down-wind distances and as such do not translate into the typical plumes that are dependent on a specified wind speed and direction. The 95% confidence limits take into account all of the wind speeds and directions measured over the entire year. This estimate is therefore more conservative than assuming a specific wind direction and speed. The NBAF EIS has been modified to clarify this issue.

Comment No: 3 Issue Code: 21.0
DHS notes that the calculated values are based on a 5 km radius and not 10 km where the concentration of pathogens falls off precipitously. The NBAF EIS has been modified to correct this error.

Hollibaugh, James

Page 2 of 2

WD0044

3 cont.| 21.0

The formula for calculating the area of a circle is pi x r x r (or $A=\pi r^2$) where A = area, pi (π) is a constant equal to 3.1416, and r is the radius of the circle. Although the radius of the plume is clearly given (in several places) as 10 km, for some reason your consultant assumed it had to be divided by 2 (10/2=5) and used 5 as the value for r in calculating area. At any rate, because of this error, the area under the plume is 314 km^2, NOT 78.5 km^2, and the number of livestock that would be exposed (at the value given of 20-30 livestock/km^2 for Clarke and Oconee counties GA) is 6280 to 9420, not "as many as 2300 cattle" as stated in the report.

This is actually a minor (if conspicuous) error ($2^2=4x$), compared to the one resulting from using the wrong integration time for inhalation exposure, but the combination of these two errors means that a great deal more livestock would be exposed in the event of an unmitigated release.

Hollibaugh, Ryan

Page 1 of 1

WD0538

From: Ryan Hollibaugh [redacted]
Sent: Sunday, August 24, 2008 11:22 PM
To: NBAFProgramManager
Subject: NBAF location

Department of Homeland Security:

1| 24.2 I went to school in Athens and now live in Atlanta. My family still lives there, just 3 miles from the proposed site. Like them, I support bringing NBAF to Athens. My reasons are as follows:

2| 21.2 I understand the importance of protecting agriculture and public health against infectious diseases. As a scientist, I know that microbes have the ability to threaten public health and agricuture. I also know that technology has made remarkable advances in recent years to assure containment of dangerous pathogens in facilities like NBAF.

3| 15.2 As a former resident of Athens, I know that the city needs economic growth, and I believe that a federal facility will add economic vitality to an area that has struggled to develop biomedical industry. I might one day wish to live in Athens, but the job prospects for scientists are right now very limited, and it presently is not a even a consideration.

1 cont.| 24.2 I hope that you will select Athens as the future site for NBAF.

Ryan Hollibaugh

Comment No: 1 Issue Code: 24.2
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 21.2
DHS notes the commentors statement.

Comment No: 3 Issue Code: 15.2
DHS notes the commentors statement.

Hollinger, Lori

Page 1 of 1

PD0061

August 13, 2008

Yes,

My name is Lori Hollinger and I'm a concerned citizen living [redacted] Long Island.

1| 25.1 I am very opposed to the bio safety level-4 that's being proposed for Plum Island. I am opposed to it because there are pathogens that will be studied that are contagious to humans, that can be passed on to humans.

2| 21.1 If there is a natural disaster, a hurricane, a tornado, or a terrorist attack, or any kind of disaster, which cannot be foreseen, there is no escape route on Long Island.

3| 17.1 Even though Plum Island is isolated, for those of us who are just a tiny distance away, we would be sitting in a parking lot if we ever had to leave for any reason.

Therefore, I think it is a terrible choice for this area, and I hope you will be reconsidering the location of the facility.

Thank you.

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 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 natural phenomena events such as tornadoes, hurricanes, floods, and earthquakes. The NBAF would be designed to withstand the normal meteorological conditions that are present within the geographic area of the selected site.

DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

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 hoofed household pets are also not affected by FMD.

Comment No: 3 Issue Code: 17.1
DHS notes the commentor's concerns regarding transportation of pathogens. A discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. Additionally, an analysis of accidental releases during transportation is provided in the NBAF EIS under Section 3.14, Health and Safety. Information regarding 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 that would include area evacuation plans would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations.

Holmes, Carol

Page 1 of 2

MD0135

[redacted]

August 12, 2008

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

Dear Mr. Johnson:

Re: NBAF Comment, Butner, NC Site Location

1| 25.3 I oppose the location of the NBAF in Butner, North Carolina. The proposed lab will be handling pathogens that would be devastating if released. While the risk of an accident
2| 21.3 has been evaluated (optimistically, I think) as low to moderate, it is not reassuring given
3| 19.3 the consequences. Even if evacuation was a viable option in such an event, it would be difficult, if not impossible, for people in area hospitals, prisons, nursing homes and
4| 20.3 retention centers to leave the area. In addition, people from all over the country come to this area to receive medical care from Duke and UNC hospitals for life threatening illnesses; placing the NBAF in the area seems counterintuitive.

5| 12.3 There are also environmental effects to be considered. The DEIS estimates that the facility will use between 36-52 million gallons of water per year. Due to North Carolina's drought problems, North Carolinians have worked hard to conserve water. Water is not an unlimited resource. How would we offset this new drain on our supply?

Another water-related effect has to do with runoff and discharged wastewater. The DEIS acknowledges that the Umstead site is close to surface waters, so the potential for effects are greater. This is a concern.

6| 9.3 Air quality is another issue. In the "Air Quality" section of the DEIS summary, the report acknowledges that air quality "effect" would occur with the general construction and operation of the NBAF and that additional effects to air quality would occur if incineration is used to treat and dispose of pathological waste. Air quality is also a concern.

Comment No: 1 Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site.

Comment No: 2 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, including releases due to weather events. 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: 3 Issue Code: 19.3
DHS notes the commentor's concern regarding the safe operation of the NBAF. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and consequences of thoseaccidents Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences

from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

The need for an evacuation in response to an accident is considered to be a very low probability event.

Comment No: 4 Issue Code: 20.3

DHS notes the commentor's concern about the human health and safety of the surrounding institutional residents. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, 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. 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 includingaccidentsat the NBAF, and which would include stipulations for all special-needs populations.

Comment No: 5 Issue Code: 12.3

DHS notes the commentor's water quality concerns and DHS acknowledges the current regional drought conditions. As described in Section 3.7.7.3.1 of the NBAF EIS, the South Granville Water and Sewer Authority has 3 to 4 million gallons per day of excess potable water capacity and could meet NBAF's need of approximately 110,000 gallons per day, currently less than 0.4% of the Authority's total current capacity. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 210 residential homes. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.3.7.3.4 describes the SGWASA influent standards that NBAF would have to meet and Section 3.13.8 describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste. Section 3.7.7 describes stormwater and erosion control management options available such as but not limited to grassy swales, retention ponds, pervious pavement, engineered filter fences and drop inlets, on-site reuse and potentially innovative technologies.

Comment No: 6 Issue Code: 9.3

DHS notes the commentor's concern for air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the Umstead Research Farm Site are discussed in Section 3.4.7.

Air pollutant concentrations were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards.

Holmes, Carol

Page 2 of 2

MD0135
(2)

7| 24.1 In reviewing the site options, it seems that if such a facility is truly needed, then the Plum Island site would be the best location. It has the lowest likelihood of spreading disease; noise levels would not be as bothersome; water usage would be lowest; military materials have already been cleaned up (unlike Butner); and climate conditions would not be conducive to the spread of Rift Valley fever (unlike Butner).

In reading the DEIS summary, I can't help but feel that the human element is getting lost among the science, facts and figures. Our world is not a laboratory. It is fragile. We need to take great care in how we treat it. It is the only world we have.

cont.| 1| 25.3 I respectfully request that you do not build the NBAF on the Umstead Research Farm Site in Butner, North Carolina.

Very truly yours,

Carol P. Holmes

Carol P. Holmes

[redacted]

Comment No: 7 Issue Code: 24.1

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

Holmes, F. Clarke

Page 1 of 2

[redacted]

FD0054

[redacted]

TO:	James Johnson	FAX NUMBER:	1-866-508-6223
COMPANY:	U. S. Department of Homeland Security Science & Technology Directorate		
FROM:	F. Clarke Holmes	DATE:	8-25-08
SUBJECT:	Support for the Flora, Mississippi Bio and Agro-Defense Facility		
COMMENTS:			

Holmes, F. Clarke

Page 2 of 2

[redacted]

FD0054

[redacted]

August 25, 2008

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

RE: Locating a Bio and Agro-Defense Facility in Flora, MS

Dear Mr. Johnson:

1| 24.5 The Central Mississippi Planning and Development District, which promotes area-wide progress through regional planning and development concepts in areas such as local planning, government management, and human resource coordination, fully supports locating a Bio and Agro-Defense Facility in Flora. The District strongly believes that locating this facility in Central Mississippi will create a positive ripple effect on the entire state for generations to come. This facility will not only help in keeping some of the state's brightest from leaving, but bring new opportunities to all of our schools, colleges and universities. Locating this facility in Flora is truly a once in a lifetime opportunity for Mississippi.

Sincerely,

F. Clarke Holmes

[redacted]

[redacted]

Comment No: 1 Issue Code: 24.5

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

Holston, Noel

Page 1 of 1

MD0133

August 19, 2008

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

1| 25.2

Dear Mr. Johnson,

Upon reviewing pertinent documents and following this unfolding story in the local media, I have come to believe that the proposed NABF facility should be built somewhere other than Athens, Georgia. I recognize its importance, but I hope it will be located someplace more isolated, perhaps in the far West.

Thank you for taking public comment. This is an emphatic "nay" from northeast Georgia.

Regards,

[redacted]

Comment No: 1 Issue Code: 25.2

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

Honigberg, Emily

Page 1 of 1

WD0545

From: Emily Honigberg [redacted]
Sent: Monday, August 25, 2008 1:35 AM
To: NBAFProgramManager
Subject: Opposed to lab site in Athens, GA

1| 25.2 As a long-time resident of Athens. I am opposed to locating the NBAF facility at the proposed Milledge Avenue site in Athens, GA. I believe that this location is an unwise choice for reasons that include the following, as well as many unknowns:

2| 15.2
3| 13.2 1. Dense human populations and significant animal populations nearby.

4| 21.2
5| 23.0 2. Troubing wind patterns, with this location along a weather pattern of strong winds, thunderstorms, and tornado warnings. NBAF's EIS report notes that the proposed structure is "not expected to resist the effects of windblown missiles. Apparently, little consideration is being given to the real potential for the transport of pathogens by strong winds, should the laboratory be damaged in windstorms.

cont.| 4| 21.2 3. Due to the warm and humid climate in Athens, a large mosquito population that provides another known condition for spreading disease.

6| 12.2 4. Serious drought conditions and inadequate sewage systems.

cont.| 1| 25.2 Those of us who care about the health and safety of this community and region are disappointed that university and government officials did not make the effort to fully understand what a bad idea it was to bring NBAF to Athens. MANY OF US STAND READY TO STRONGLY PROTEST CONSTRUCTION OF THE NBAF LAB HERE.

Emily Honigberg
[redacted] GA [redacted]

Comment No: 1 Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 15.2
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 Draft EIS. The risks were determined to be low for all site alternatives. As described in Section 2.3.1 of the NBAF EIS, DHS's site selection criteria 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 subburban or sem-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.

Comment No: 3 Issue Code: 13.2
DHS acknowledges the commentor's concern regarding wildlife populations in the vicinity of the South Milledge Avenue Site. 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 wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). The ranges of potential arthropod vectors for Rift Valley fever encompass all of the six potential NBAF sites. The risk assessment in Section 3.14 takes into account the presence of arthropod vectors and the effects of climate on arthropod populations at each of the sites. 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. 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. 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: 4 Issue Code: 21.2

DHS notes the commentor's concerns regarding an accidental release of a vector, such as a mosquito, from the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. 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.

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

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

Comment No: 5 Issue Code: 23.0

DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 6 Issue Code: 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.

Hope, III, Daniel

Page 1 of 1

WD0578

From: Daniel Hope iii [redacted]
Sent: Sunday, August 24, 2008 2:45 PM
To: NBAFProgramManager
Subject: Support for Athens, GA NBAF Site

1|24.2 My name is Dan Hope and I want to register my support for locating NBAF in Athens, GA. I am retired from The University of Georgia and currently serve as a community representative on the UGA Institutional Biosafety Committee. My home is less than 4 miles upstream from the proposed NBAF site. I have attended several of the public meetings about NBAF, including the one on 14 August 2008. I do wish Homeland Security and the

2|4.2 U.S.D.A. had clearly articulated examples like Ft. Deitrich and the CDC which have co-existed with residential and large population areas for years.

At each of these meetings I have watched as a small group of rather fanatical protesters claim to be speaking for the entire community. This group, FAQ, does not speak for me or for most people with whom I have discussed NBAF. FAQ's emotional approach seems to have two intentions: first to protect their individual homes from what they perceive to be a threat, and second to block anything proposed by the George W. Bush administration.

Their first point I understand, but not their lack of rational thinking and their threatening manner in defending it. If this country had always chosen the side of uninformed fear over limited risk we would be no better off than a third world country. Georgia recently suffered a tragedy near Savannah when a sugar refinery exploded. Had a group like FAQ (For Quality of Life Athens) been around when the sugar factory was proposed decades ago, it would never have been built.

3|2.0 Unfortunately, I also understand their second point. The current Bush administration has done more to damage the image of our country than any in our history. It is no wonder FAQ doesn't trust the them. I also know there are thousands of excellent career professionals in the federal government who know their jobs and do them well. Fortunately, in the near future they will no longer have to worry about ideology and arrogance preventing them from doing what is right.

Daniel Hope III

Daniel Hope III, Ed.D., CPRP

"We train in hopes of being of some use, however small our role may be,
in the task of bringing peace to mankind around the world."

-Morihei Ueshiba-

Comment No: 1 Issue Code: 24.2
DHS notes the commentor's support for the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 4.2
DHS notes the commentor's statement.

Comment No: 3 Issue Code: 2.0
DHS notes the commentor's statement.

Horn, George

Page 1 of 1

WD0305

From: GEORGE HORN [redacted]
Sent: Sunday, August 17, 2008 12:00 PM
To: NBAFProgramManager
Subject: NBAF comments

1|25.2 I would like to OPPOSE relocating the NBAF lab to Athens, Georgia. As a citizen of the Athens area I talk to many other people who share my view that the lab would not be a welcome addition to the area.

2|5.1 We feel that updating the Plum Island Facility would be the best choice for many reasons- not building on presently undeveloped land.

Thanks for the consideration.

Comment No: 1 Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 5.1
DHS notes the commentor's support for the Plum Island Site Alternative and opposition to the South Milledge Avenue Site Alternative.

Horning, Al

Page 1 of 1

WD0489

From: Al Horning [redacted]
Sent: Friday, August 22, 2008 12:32 PM
To: NBAFProgramManager
Subject: National Bio and Agro-Defense Facility

1| 24.4 As a citizen of Kansas you should know that I support NBAF in Kansas.

Good luck with being selected for this important facility.

Al Horning

Comment No: 1 Issue Code: 24.4
DHS notes the commentor's support for the Manhattan Campus Site Alternative.

Horton-Smith, Glenn

Page 1 of 5

WD0345

From: Sandy Horton-Smith [redacted]
Sent: Tuesday, August 19, 2008 9:05 AM
To: NBAFProgramManager
Subject: NBAF DEIS treatment of windstorms inadequate
Attachments: NBAF_DEIS_comment_mail.pdf

Please note: the content of my comments are contained in the attached PDF file. If you are unable to process attachments or PDF files sent by e-mail, please inform me before the expiration of the public comment deadline, and I will be happy to mail a hard copy.
Regards,
Glenn A. Horton-Smith

Horton-Smith, Glenn

Page 2 of 5

WD0345

July 31, 2008
2101 Laurel Pt
Manhattan, KS 66503

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

nbafprogrammanager@dhs.gov

Dear Mr. Johnson,

I write to call your attention to a number of internal inconsistencies and other problems in the way that wind storms (tornadoes, hurricanes, damaging straight-line winds, etc.) are addressed in the Draft Environmental Impact Statement (DEIS) for the National Bio and Agro-Defense Facility (NBAF). These issues are described in detail below.

It should be emphasized that, as stated in the DEIS, all six of the sites considered for NBAF are subject to high winds, so these comments should not be taken as an objection specific to Kansas or any other site. These comments should be taken as being fundamentally concerned with the adequacy of the DEIS. I feel strongly that these problems in the DEIS, which pertain to a scenario of great potential harm, must be resolved satisfactorily and reviewed for correctness before a properly informed decision can be made on NBAF, regardless of site.

The deficiencies in the DEIS regarding wind storm risks include the following:

1|21.0

1) A conclusion about risk that is contradicted by the technical discussion in Appendix E.
In section 3.14.3.2, in the summary of the risks of an earthquake or tornado, it is stated that *"the robust safety controls considered are sufficient to prevent or mitigate the accident."* However, in Appendix E, section E.4.2, on pages E-133 to -134, it is clearly stated that both the Active and Passive confinement systems (HEPA filters, etc.) would suffer *"catastrophic failure and a total release of pathogens for a significant seismic or high-wind event,"* and furthermore that *"the facility structure and safety systems are not adequate to prevent or mitigate the release of either of these postulated accidents."*

2) Inconsistencies in the stated accident frequency estimates.
In Table 3.14.2.7-1, page 3-402, the frequency of a dangerous tornado or other wind storm event is given as *"E-2/yr to E-4/yr"*, i.e., ~0.01/yr to ~0.0001/yr, with no difference between unmitigated and mitigated frequency. However, in Table 3.14.3.2-1 and in Table E.4.2.1-1, the

1/4

Comment No: 1 Issue Code: 21.0

DHS has the following responses to the commentor's statement and questions

1. There is no inconsistency. The risk results section takes into consideration the following (as stated on pages 3-426 – 3-427: "Design considerations for these critical safety barriers are to limit facility damage as a result of design basis natural phenomena events so that hazardous materials can be controlled and confined, occupants are protected, and the functioning of the facility is not interrupted. Because the safety analyses determined that high-biocontainment biological materials are required for worker safety, a higher design requirement designation is appropriate for the safety equipment necessary to prevent a release. Given the risks posed by the potential seismic and other natural phenomena, accident provisions for design consideration of the facility structure and critical safety equipment should be consistent with those used for facilities designed to standards above that for the model building code requirements for essential facilities (DOE 2000; DOE 1996)."

2. There is no inconsistency. The frequency provided in the Hazards Assessment (HA) results (Table 3.14.2.7-1) is based on the qualitative estimates of the hazard, which in this case is the tornado or high wind event. The HA scenarios were developed to bound the accidents and to be used as a basis for selecting those significant scenarios that were carried forward into detailed analysis. The results provided in Table 3.14.3.2-1 are the results of that detailed analysis as presented in Appendix E event trees. The reduction in frequency accounted for in the final detailed accident analysis relies upon the robust design taking into consideration the provisions set forth in DOE standards for high hazard facilities.

3. There is no inconsistency. The accident scenario was postulated to provide the basis for recommending upgrades to design from the current conceptual to later stages leading towards construction that criteria will have to be set to ensure that natural phenomia hazards (NPH) events do not compromise the facility integrity. The risk conclusions are supported in that an effective design and operation can significantly reduce the risks posed by NPH hazards.

4. There is no inconsistency. The statements are taken out of context – the risk evaluation, based on the current design criteria as presented in the Feasibility Study, indicated that NPH events could exceed the stated design specifications. The risk results therefore indicate the need for considering a robust design consistent with standards for high hazard operations.

5. DHS agrees with the comment that Section E.4.2.1 Earthquake could be renamed to be E.4.2.1 Seismic and High Wind Events. However, there are no inconsistencies or that there is no potential for being able to appropriate separate the issues and understand the risks. In terms of presenting the risks associated with potential low probability NPH events the analysis presented in the NBAF DEIS accurately describes both the likelihood of the phenomena and the potential adverse consequences, which provides the qualitative/semi-quantitative risk estimates. The comment would at first lead one

to believe that there are errors and inconsistencies and therefore the conclusion is not defensible. On the contrary the analysis as presented is defensible in that the evaluation as stated in the document is based on the written information provided in the referenced Feasibility Study relative to design criteria. In addition, the analysis clearly indicates that the need for the design to be enhanced because of the identified hazards. The analysis demonstrates the need for robust design and the mitigated risk estimates presented in Chapter 3 Section 14 take the upgraded design into account. The presentation of results in Appendix E could be improved to address the perceived inconsistencies, however, this would not change the fundamental results, which were modeled in a extreme conservative manner.

6. DHS disagrees with the comment. The general misconception represented by the comment is that the high-wind event is the greater risk because pathogens can be transported down-wind. The analysis presented clearly separates the components of the risk estimates resulting from the NPH events. The seismic event is shown to be able to impact the entire facility, but lacks the mechanisms to cause the subsequent dispersion of pathogens after a release, while the high-wind event does not have the same potential for catastrophic destruction of the structure, yet does provide a mechanism for being able to disperse pathogens from the facility. Because these specific components were not quantitatively developed from the conceptual design the coupling of these scenarios into a single consideration of risk related to NPH events. Because the conceptual design criteria provided in the Feasibility Study were only criteria the analysis assumed that the effect on the facility would be catastrophic. This assumption is both bounding and conservative and clearly indicates the need for robust design and construction of the final facility.

Horton-Smith, Glenn

Page 3 of 5

WD0345

1 cont.| 21.0

accident frequency is given as 1E-4 to 1E-6 [/yr], and the mitigated frequency is <1E-6 [/yr].

3) A conclusion regarding risk mitigation that is unsupported or contradicted by the technical discussion.

In section 3.14.3.2 and in Table 3.14.3.2-1, the mitigated accident frequency is shown as being less than the unmitigated frequency, and the mitigated risk is determined to be acceptable while the unmitigated risk is not. However, in this section (which is identical to the beginning of section E.4.2 up to Table E.4.2.1-1), there is no explanation of how mitigation can be achieved other than the words "NBAF structure, ventilation HEPAs" appearing in the table. This is in contradiction to the clear and specific statements on pages E-133 to -134 that the facility structure would *not* resist the high-wind events considered, that the active ventilation would *not* operate, and that the passive containment system would not remain intact and functional.

According to the risk formula presented, mitigation can occur either by reducing the probability of the event occurrence (in this case, a severe wind event) or by preventing release when the event occurs. It is obvious that the mitigation techniques mentioned in section 3.14.3.2 ("NBAF structure, ventilation HEPAs") cannot control the weather, and the technical discussion in the later parts of section E.4.2 states that they cannot prevent release if the event occurs. Therefore, the risk conclusion is either unsupported or contradicted.

It may be noted that the text in E.4.2 does mention two other mitigation strategies to reduce the available sources of virons in case of a severe wind storm event ("robust storage containers (BSCs, containers, cabinets, etc.) seismically anchored and resistant to mechanical insults" and "working inventory is minimized", both page E-133; also "there is the potential that actions can be taken in advance to containerize infectious materials prior to the storm occurring", pages 3-427 and E-133), which might indeed provide some mitigation, but these are not considered in the subsequent discussion or analysis, and they do not appear as mitigating factors in the subsequent analysis. For example, there is no difference between "mitigated" and "unmitigated" scenarios in Table E.4.2.1-2.

4) *Inappropriate or inconsistent use of the overall structural failure accident analysis to determine air handling system robustness (in internal contradiction with part of the technical discussion in Appendix E).*

In the section on "Construction requirements -- biosafety design" and the discussion of the "box-within-a-box" construction, mention is made only of prevention of structural collapse. Tornadoes are mentioned in sections on "Climate and Severe Weather" for the Kansas site, where it specifically says that "a significant wind storm" would cause "dramatic increase in internal pressures" (which presumably would apply to other sites as well), but again only the resistance against structural collapse is mentioned. While it is clear that the interior BSL-3Ag and BSL-4 structures survive because they are reinforced cast-in-place concrete, there is simply no mention of an air handling system with the same strength as the structure. Again, in Appendix E, section E.4.2, on pages E-133 to -134, it is clearly stated that the air handling system would not survive such an event.

2/4

Horton-Smith, Glenn

Page 4 of 5

WD0345

1 cont.| 21.0

5) *Merging of two natural phenomena accident scenarios into one discussion and/or the omission of the source term analysis from one scenario and the risk rank analysis from the other scenario.*

Inconsistencies in titling, significant sections of repeated text, and other signs clearly indicate an incomplete and inconsistent accident scenario treatment, possibly as the result of editorial or communication errors among the draft's authors. In Appendix E, section E.4.2.1 (titled simply *"Earthquake"*), the text indicates that the scenario *"Natural Phenomenon Accident #7 – Large, Multi-Laboratory Spill as a Result of Seismic or High Wind Natural Phenomena"* is being considered, and that *"for the purposes of this accident analysis, the effects from natural phenomena events are combined into a single bounding analysis."* This indicates that a single scenario is to be presented.

However, at least two different cases of wind storms are then discussed: one with wind speeds exceeding 119 mph causing some damage, occurring with a certain frequency, and one with wind speeds in excess of 150 mph causing complete structural failure, also occurring but with less frequency. It is not sufficiently clear which event frequencies and event strengths are used in the bounding analysis. In fact, from a detailed look at the numbers and careful reading of the text, it appears that one type of event may have been considered in the early part of this section, and another considered in the later part following the first table.

In addition, two mitigation scenarios are described: one with the possibility of advanced warning on some occasions, as with severe weather, and one without such possibility, as with a seismic event. It is stated that the scenario considered will assume no warning as a conservative bounding case. However, the first table in this section shows mitigation of the release risk, suggesting that either the warning-based mitigation scenario (allowing materials to be secured) or the less-severe event scenario (allowing some possibility of survival of the containment system) was indeed assumed here.

Significantly, on page E-132 immediately after the first table, the text suddenly repeats two paragraphs from page E-130: *"In addition, all of the proposed NBAF sites are located within regions that experience high winds greater than 119 mph.... In addition, other natural phenomena events have a significant potential.... subsequently releasing pathogens to the environment."* However, the following text describes different events. Immediately following the first occurrence of these two paragraphs is a paragraph stating *"For the purposes of this accident analysis, the seismic event was considered as the potentially bounding natural phenomena..."* However, immediately following the second occurrence of these two paragraphs is the statement *"For the purposes of this accident analysis, the combined high-wind or seismic event was considered as the potentially bounding natural phenomena accident."* (Emphasis added.) The inconsistencies already described in points 1-4 above are largely between the two parts of section E.4.2.1, strongly suggesting two different scenarios are being considered. If so, the source term analysis is missing from the first scenario, and the risk rank analysis is missing from the second scenario. Alternatively, an inconsistent analysis of a single poorly-defined scenario is presented. In any case, this section of the DEIS is so incomplete and/or so internally

3/4

Horton-Smith, Glenn

Page 5 of 5

WD0345

1 cont.| 21.0

inconsistent that it is impossible to tell which (if any) of the risks from wind storm events have been fully and properly addressed.

6) Quoting only the earthquake accident scenario risk rank as the risk rank for the wind storm accident scenario, despite the technical analysis indicating greater risk from the wind storm scenario.

In section 3.14.3.2, the statement that *"the robust safety controls considered are sufficient to prevent or mitigate the accident"* is based entirely on the analysis of the earthquake scenario presented in the first part of section E.4.2.1. (Indeed, this section of chapter 3 appears to be essentially a verbatim copy of the first part of section E.4.2.1.) The information and results of the analysis in the later part of section E.4.2.1, which deals with "*the combined high-wind or seismic event*", does not appear in the risk summaries presented in chapter 3 at all. This is troubling since that analysis indicates greater risk from the high wind scenario: for example, it is stated on page E-133 that an earthquake has "*little energy to provide a mechanism for transport of pathogens outside of the facility,*" whereas "*in the case of a high-wind event, there is energy to both affect the facility structure and to provide the mechanism to transport the pathogen into the environment.*" Thus, only the less risky scenario has been provided to the public in chapter 3.

In conclusion, the risks associated with wind storms have not been adequately addressed in the Draft Environmental Impact Statement. This is quite troubling given the great potential for widespread harm identified in technical analysis in Appendix E. If strategies for addressing these risks have been developed, they are not presented as such in the DEIS, as should be clear from the above. Any such safety strategies must be properly explained, analyzed, and presented for comment, and the other problems identified above in the DEIS must be resolved satisfactorily and reviewed for correctness, before a properly informed decision can be made on NBAF, regardless of site. I feel strongly that no decision on NBAF should be made unless and until it is done with the participation of a properly informed public.

Sincerely,

Glenn Horton-Smith

4/4

Houlik, Lisa

Page 1 of 4

WD0874

From: Lisa Houlik [redacted]
Sent: Monday, August 25, 2008 11:47 PM
To: NBAFProgramManager
Subject: NBAF DEIS Comments
Attachments: NBAF DEIS Comments 08-25-08.doc

Dear Mr Johnson,

Attached is my comment statement regarding the proposed NBAF.

Thank you for your consideration.

Lisa Houlik
[redacted]

Houlik, Lisa

Page 2 of 4

WD0874

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

RE: Proposed Butner, NC Site

Dear NBAF Program Manager,

1| 26.0 The following information is my formal comments regarding the National Bio Agro Defense Facility draft Environmental Impact Statement.

Within the DEIS, your agency totally circumvented any analysis of impact on the Town of Butner, only mentioning the town twice in the entire document and then only in regards to its proximity to I-85. The DEIS failed to evaluate Central Ave. for any criteria such as affected environment, construction consequences, operation consequences, quality of life, air quality and cumulative impacts.

2| 15.3,20.3 The socioeconomic consequences of a potential accident or pathogen release are not sufficiently addressed. No evacuation plans for the more than the 7000 patients and inmates were discussed. Nor were any quarantine measures discussed for the population, incarcerated, institutionalized or otherwise. The mere mention of "movement control zone" you refer to at Table 3.8.9-1 —" National Park Service Potential Strategies and Considerations for FMD Response" is clearly a socioeconomic and socio-justice issue with civil class-action merit that will be utilized.

3| 23.0 The DEIS states that aerial spraying of pesticides (in a watershed?) may be used to prevent RVF from becoming entrenched in the environment but yet gives no discussion on how it would know if an release had occurred. Frequency of spraying, duration and so forth.

4| 21.3 The DEIS must include an analysis of protocols for emergency situations, such as animal escapes, fires, facility malfunctions, and medical emergencies; absent this, it is impossible to adequately assess the risks posed by this specific facility to the community as well as surrounding areas.

cont.| 1| 26.0 The DEIS states that the daily operation of the URF site does not adversely affect our environment in one section and then in another section of the EIS states that as previously stated, PM2.5 exceeded the NAAQS at all sites. The EIS is filed with contradictory statements and analysis with no explanation or rationale.

5| 2.0 What pathogens will be studied? Eight depends on which study you read apparently. The EIS should have also address two other diseases specifically identified in the 350-

Comment No: 1 Issue Code: 26.0
The NBAF EIS uses a sliding scale approach for the basis of analyzing the potential environmental effects. Therefore certain aspects of the alternative that have a greater potential for creating environmental effects are discussed in greater detail than those that have little potential for effects.

Comment No: 2 Issue Code: 15.3
DHS notes the commentor's concern. DHS is aware of and has considered the presence of the health and correctional facilities, described in Section 3.10.7.1 of the NBAF EIS. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 and Appendix E of the NBAF EIS. The risks were determined to be low for all site alternatives. The need for a quarantine zone or an evacuation in response to a release, and particularly actions that would affect the special-needs populations of concern, would be a very low probability event. As noted by the commentor, the response measures discussed in Section 3.8.9.1 of the NBAF EIS relative to a release of FMD virus would not be expected to impact the health and safety of special-needs populations. A site-specific emergency response plan would be developed and coordinated with the local emergency management plan regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF, and would include stipulations for any special-needs populations including institutionalized populations.

DHS notes the commentor's concern. A site-specific emergency response plan will be developed and coordinated with the local Emergency Management Plan regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF. The risks and associated potential effects to human health and safety are evaluated in Section 3.14 of the NBAF EIS. The risks were determined to be low for all site alternatives, and the probability of a release requiring a quarantine or evacuation is very low. DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans will also include training for local law enforcement, health care, and fire and rescue personnel.

Comment No: 2 Issue Code: 20.3
DHS notes the commentor's concern about the human health and safety of the surrounding institutional residents. Chapter 3, Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. 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. 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: 3 Issue Code: 23.0

DHS notes the commentor's concerns regarding an accidental release of a pathogen from the NBAF and the establishment of that pathogen in native wildlife or vectors such as mosquitoes. 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 Umstead Research Farm Site is specifically addressed in Section 3.8.9 and Section 3.10.9.5 as well as in Section 3.14.4.5 (Health and Safety). Section 3.10.9.5 discusses the relative suitability of the regional climate of the Umstead Reserarch Farm Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.7.1 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.

DHS notes the commentor's views on the safety of 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.

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: 21.3

DHS notes the commentor's concern that site specific operational, safety, security and emergency response plans are not included in the NBAF EIS. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The anaysis conducted in the NBAF EIS was based on conceptual design plans posted on the DHS website. More detailed design plans would be developed as the project moves into the final design phase. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific operational, safety, security and emergency protocols and plans would be developed that would consider the diversity and density of human, livestock and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed 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: 5 Issue Code: 2.0

DHS notes the commentor's concern that all possible pathogens to be studied at the NBAF are not listed in the NBAF EIS. A current listing of pathogens to be studied at the NBAF as provided in Section 2.2.1 of the NBAF EIS includes Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. All hazardous biological agents or toxins as listed for study or have the potential for study at the NBAF are regarded as select agents under the Possession, Use, and Transfer of Select Agents and Toxins, Interim Final Rule (9 CRF 121), and are regulated by the Secretary of the Department of Health and Human Services. The responsibility for the management of the Select Agent Program is under the control of the Centers for Disease Control and Prevention (Centers for Disease Control and Prevention). The research protocols to be used by the NBAF involving the study of the currently listed or newly identified select agents require registration, inspections and oversight of the NBAF by the Centers for Disease Control and Prevention, the Institutional Biosafety Committee (IBC) and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

Houlik, Lisa

Page 3 of 4

WD0874

cont.| 5| 2.0 page NBAF Conceptual Design and Feasibility Study commissioned by DHS, dated August 24, 2007. Those diseases are Newcastle Disease and avian flu. This previously undisclosed fact was confirmed at the DEIS meeting in Butner by a DHS panel member. Avian flu has specific relevance for North Carolina, given its large commercial poultry operations and pig farms. No mention of the potential economic consequences of these pathogen releases from the proposed NBAF were not discussed or evaluated.

Also with the research of the Hendra virus being identified for study you failed to discuss subject of said research. Since the virus affects horses, flying foxes; humans which will be your subject? The Horse industry and equine population has a huge presence in the proximity of the proposed site as well as surrounding counties. Potential economic consequences on the equine population was not evaluated.

cont.| 1| 26.0 The DEIS states that the economic impact of a release of highly transmissible Foot and Mouth Disease could be "significant" but vastly underestimates the impact at about $4 Billion dollars, while a release in Great Britain caused more than $17 Billion in losses. Grossly underestimating actual cost.

6| 12.3 The DEIS failed to fully investigate the wastewater treatment capacity of South Granville Water and Sewer Authority. The fact it is currently operating under a provisional permit, which is being challenged by several environmental organizations as well as the citizens of Butner. Moreover, the DEIS fails to evaluate that Falls Lake, the final receiving body of water of the NBAF effluent discharge is considered impaired by the state of North Carolina and is listed as a 303d water source.

7| 18.3 The DEIS does not discuss the treatment process that will be used to dispose of the daily accumulation of thousands of pounds of infected feces and carcasses or how this waste will be tested for release into the local wastewater treatment plant as effluent.

The DEIS does not discuss the method of waste disposal of infected biological and medical waste including carcasses beyond the mention of normal processes. Incineration, alkaline hydrolysis or rendering affect NAAQS and the environment. However, the EIS fails to take a "hard look" at the environmental consequences of these issues concerning proposed NBAF.

cont.| 4| 21.3 In closing, I do not feel there is any meaningful information of substance in the DEIS for me to comment on any further. I find nothing in the DEIS that leads me to believe this facility will be safe in my community for the next 50 years. The DEIS does not address

cont.| 3| 23.0 the final design of the facility and seems to say the NBAF will be safe without the hard data to prove it, as supported by the testimony of the Government Accountability Office. All of my State and local politicians have with drawn support and have gone on record by opposing the facility being sited in Butner due to the unanswered questions that were

cont.| 5| 2.0 promised to the citizens of Butner and our community leaders over the last 2 years. If your agency is not able to answer these important questions now, then how can we trust the DHS to do no harm to the community and protect our food supply in the future.

Comment No: 6 Issue Code: 12.3

DHS notes the commentor's water quality concerns. As described in Chapter 3 Section 3.7.7.1.1, NCDENR determined in 1998 that a portion of Knap of Reeds Creek was only partially supporting biological activity. Currently, 5.2 miles from Lake Butner to Falls Lake is considered impaired for biological activity. The NCDENR ambient surface water monitoring program has documented elevated manganese, fecal coliform bacteria, and low dissolved oxygen in Knap of Reeds Creek. NCDENR is currently evaluating the need for advanced treatment options of current dischargers, as well as investigating potential contributing sources that may be exacerbating the stream's impaired biological activity. Chapter 3 Section 3.13.8 of the NBAF EIS, describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste. Chapter 3 Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects. Section 3.3.7.3.4 describes the influent limits at SGWASA; NBAF would have to meet sewage acceptance criteria and pretreatment requirements.

Comment No: 7 Issue Code: 18.3

DHS notes the commentor's concerns about waste disposal. Section 3.13.2.2 in Chapter 3 of the DHS EIS for the NBAF addresses the wastes that will be generated by the operation of the facility including liquid wastes that will be discharged to the sanitary sewer (see Table 3.13.2-2), and waste solids that will be sent offsite for further treatment and disposal (see Table 3.13.2-3). As shown on these tables, all potentially infectious liquid waste streams will undergo sterilization followed by liquid effluent decontamination in biowaste cookers and all potentially infectious was solids will be autoclaved (if they are not heat sensitive) or undergo gas decontamination or liquid disinfection (if they are heat sensitive). Table 3.13.2.2-4 describes and compares the primary technologies that are being considered for carcass/pathological waste disposal (i.e., incineration, alkaline hydrolysis, and rendering). As shown on the table, all of these technologies produce sterile or noninfectious residuals.

Further, Section 3.13.2.2 explains that all of the thermal, disinfection, and decontamination technologies used to treat any type of animal waste generated at the NBAF will meet the operational and validation criteria recommended in "Biosafety in Microbiological and Biomedical Laboratories" (Centers for Disease Control and Prevention and NIH 2007) to ensure effective treatment. Also, as discussed in Section 2.2.2 of the NBAF EIS, inadequate sterilization is prevented by operational training and the use of standard protocols and SOPs that help to prevent the type of human error that could cause inadequate sterilization. Moreover, Federal, State, and local laws, regulations, and permits (such as regulations and permits established under the Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act) govern the management of the wastes, emissions, and discharges that would be generated by the NBAF.

Because the method of carcass and pathological waste disposal has not yet been determined,

Section 3.4. of the EIS (Air Quality) assumes that the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse effect. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 of the EIS (Infrastructure) assumes that alkaline hydrolysis will be used to assess the maximum sanitary sewage impacts.

Houlik, Lisa

Page 4 of 4

WD0874

8| 25.3 I will do everything in my power as a resident of Butner, North Carolina to the stop this facility's placement in North Carolina. I am oppose to the DHS, USDA conducting this level of research on the mainland US and do not support the continued proliferation of facilities like this anywhere.

Lisa Houlik

[redacted]

community and my community leaders concerns by the Department of Homeland Security. concerning potential environmental impact, socio-economic impact of the over 7,00 incarcerated and incapacitated persons living within 3 miles of the proposed facility, the financial impact of thcome

Comment No: 8 Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative, the five mainland site alternatives, and the proliferation of BSL facilities.

Houser, Barbette

Page 1 of 1

WD0718

From: barbette houser [redacted]
Sent: Monday, August 25, 2008 12:24 PM
To: NBAFProgramManager
Subject: NBAF

1|25.2 No NBAF in Athens,Ga!!!!

[redacted]

Comment No: 1 Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Howell, Ronald

Page 1 of 2

WD0210

From: HOWELL, RONALD W (RON), ATTOPS [redacted]
Sent: Thursday, August 07, 2008 8:46 PM
To: NBAFProgramManager
Cc: HOWELL, RONALD W (RON), ATTOPS
Subject: NO NBAF ... NEVER in North Carolina
Importance: High

Dear NBAF Program Manager,

I respectfully say: We do NOT want the NBAF in North Carolina !!!

The People here will not allow it to be here and will fight you every day to make sure it does not come here.

1|25.3

Raleigh City voted Unanimously AGAINST the NBAF NO
NBAF in North Carolina

Senator Elizabeth Dole is now AGAINST the NBAF NO
NBAF in North Carolina

Senator Berger of NC is now AGAINST the NBAF NO
NBAF in North Carolina

US Rep. Brad Miller is now AGAINST the NBAF NO
NBAF in North Carolina

The Town of Butner is now AGAINST the NBAF NO
NBAF in North Carolina

Granville County is now AGAINST the NBAF NO
NBAF in North Carolina

The Human Rights Committee of John Umstead Hospital... says NO
NBAF in North Carolina

Many fine People who live and work here say NO NBAF in North Carolina

2|5.1 If the Lab is to be built, Plum Island is the most practical place to locate it,

Comment No: 1 Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 5.1
DHS notes the commentor's support for the Plum Island Site Alternative.

Howell, Ronald

Page 2 of 2

WD0210

NOT around Families with small children.
The Raleigh-Durham area is heavily populated and we DO NOT want the NBAF here for many reasons.

We WILL FIGHT you on this until you take North Carolina off of the List.

1 cont.| 25.3

The message here is clear, We do not want the NBAF here in North Carolina !!!

There are many reasons to cite, most of all is the Health and Safety of our Families during the next 50 or so years that the NBAF will operate. The RISK to our people is just too high.

Please take North Carolina off of the List, you do NOT have Local Support here in our state.

best regards,

Ron Howell
[redacted]

Howells, Nan

Page 1 of 1

MD0114

[redacted]

Aug. 18, 2008

U.S. Department of Homeland Security
Directorate: James V. Johnson

Dear Mr. Johnson

I am a downtown merchant in [redacted], which is [redacted]. I opened my business in 1986 and I'm proud to call [redacted] home. As a citizen and native of [redacted], I wish to express my support for the NBAF project. I believe the majority of citizens who have taken the time to educate themselves about the project are in support.

1| 24.3

cont.| 1| 24.3

I hope you will decide the Butner site is the best location for your project. The informed citizens of Granville County look forward to working with you.

Sincerely
Nan Howells

Comment No: 1 Issue Code: 24.3

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

Howells, Robert

Page 1 of 1

MD0131

August 20, 2002

To: James V. Johnson
Science and Technology Directorate

From: Robert E. Howells
[redacted]

1| 24.3 I am writing this short note to pledge my support For the Bio-Defense Facility in Butner, NC.

As a resident of [redacted] for 23 years and a past resident of Durham County near Butner for 45 years, I can only think of positive issues that this facility can provide to the area.

Good luck in your efforts to establish this facility in Granville County.

Robert E. Howells

Robert E Howells

Comment No: 1 Issue Code: 24.3
DHS notes the commentor's support for the Umstead Research Farm Site Alternative.

Huerta, Conrad

Page 1 of 1

PD0364

August 25, 2008

1| 25.4 This is Conrad Huerta in [redacted] Nebraska, and I'm calling in reference to this National NBAF. We are asking that NBAF not be....NBAF Kansas, not be permitted.

Thank you.

Comment No: 1 Issue Code: 25.4

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

Huff, Christine

Page 1 of 1

WD0570

From: [redacted] christine Huff [redacted]
Sent: Sunday, August 24, 2008 4:36 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

1| 25.2 I am strongly opposed to NBAF and clearly wish to make it clear that I do not want it in Athens!

2| 19.2 There is no doubt, in my opinion that there are real dangers presented by NBAF being only [redacted] neighborhood.

3| 15.2 I shudder to think about how this will affect our property values.
Please register my concern.
Sincerely,
Christine Huff

Comment No: 1 Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 19.2
DHS notes the commentor's opposition to the South Milledge Avenue Site. Risks to human populations at each alternative site were evaluated and discussed in Section 3.14 and Appendix E of the NBAF EIS. The risk of an accidental release of a pathogen from the NBAF is extremely low. 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 concern. A discussion of the effects of the NBAF on property values was included in Section 3.10.3, which concluded that there is no empirical evidence that a facility such as the NBAF would reduce property values in the study area. It is possible that with the relocation of highly skilled workers to the immediate area, property values could increase due to an increase in demand.

Hulbert, Jean

Page 1 of 1

PD0320

August 25, 2008

Hi.

1| 25.4
2| 5.0
This is Jean Hulbert from [redacted] Kansas, and I would like to say no to the NBAF in Kansas. Among many other things, it makes no sense to put it anywhere, except on an island, considering how dangerous it can be.

3| 24.1
And, as far as I know, it's already on an island. So, I'm in favor of leaving it there.

Thank you.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's concern. As described in Section 2.4.3 of the NBAF EIS, other potential locations to construct the NBAF were considered during the site selection process but were eliminated based on evaluation by the selection committee. It was suggested during the scoping process that the NBAF be constructed in a remote location such as an island distant from populated areas or in a location that would be inhospitable (e.g., desert or arctic habitat) to escaped animal hosts/vectors; however, the evaluation criteria called for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. The Plum Island Site is an isolated location as was suggested while still meeting the requirements listed in the EOI.

Comment No: 3 Issue Code: 24.1
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative and support for the Plum Island Site Alternative.

Humphries, Cathy and John

Page 1 of 1

WD0537

From: Cathy Humphries [redacted]
Sent: Sunday, August 24, 2008 11:20 PM
To: nbafprogrammanager@dhs.gov
Subject: NO NBAF in Athens ga

1| 25.2 PLEASE do not bring the NBAF to Athens Ga

Thank you

Cathy and John Humphries

[redacted]

Comment No: 1 Issue Code: 25.2

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

Humphries, Cathy and John

Page 1 of 1

WD0539

From: Cathy Humphries [redacted]
Sent: Sunday, August 24, 2008 11:29 PM
To: nbafprogrammanager@dhs.gov
Subject: NO NBAF Athens ga

1| 25.2 2| 2.0 As a resident of [redacted] ga we DO NOT want the nbaf here. We do not feel that it is safe. We do not feel that we have been properly informed. We do not feel that our elected officials have any clue as to how the residents feel about the nbaf. Clearly they are only concerned with $$$$$!!!!! PLEASE hear us we do not want the nbaf here!!!!!!

Thank you!!!!!

Cathy Humphries
John Humphries

[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: 2.0
DHS notes the commentor's statement.

Hunter, Nancy

Page 1 of 3

WD0622

From: info@athensfaq.org on behalf of Nancy Hunter [redacted]
Sent: Saturday, August 23, 2008 11:57 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

1|24.0 I am not opposed to the research to be conducted at the National Bio and Agro Defense Facility.

2|25.2 I am opposed to this facility being located on the mainland. And I am particularly opposed to it being located on S. Millege Ave. in Athens. My concerns were heightened after reading the Executive Summary of the Environmental Impact Statement.

2Cont.|25.2; 3|24.1 The Executive Summary explores 14 categories that could potentially have a negative impact on the chosen community. The S. Millege Ave. site is listed as having more areas of negative impact than any other site being considered. Plum Island would pose the least.

4|3.0 LAND USE
• According to the EIS, all sites are consistent with the local land use and zoning regulations. That is definitely not true for the Athens site.

5|27.0 Nine years ago, our Commissioners hired a consulting firm to investigate what kind of zoning Athens citizens wanted and visualized for their community. Out of those visioning sessions came what we call the Green Belt.

The Green Belt is the A-R zone that comprises the outer boundaries of Clarke County. It was designated the Green Belt because citizens want to prevent sprawl and preserve the agricultural nature of our outer boundaries. That was particularly important as the smallest county in Georgia.

4Cont.|3.2 • If the EIS investigators spoke to the county Planning Department they would have been told that by law UGA does not have to conform to any local zoning or land use plans and that is why our community's Green Belt falls apart on S. Millege Ave. If our local government had jurisdiction over the S. Millege Ave property it would not be under consideration for the NBAF site right now.

According to the letter of the law, UGA can do what they wish with their land, but do not make the mistake of thinking that UGA's land use decisions are in any way consistent with the local community's vision. To state in the EIS report that the building of a huge facility on S. Millege Ave., is consistent with our LOCAL land use and zoning regulations is patently false.

• Other impacts addressed in the EIS report seem all the more disturbing in light of the above.

6|7.2; 7|13.2 VISUAL
• S. Millege Ave. will be especially impacted visually if NBAF is located here. I refer you again to the local community's desire for an agricultural Green Belt. The local community has voiced their preference to keep this area rural in nature – a huge building with security fencing and 24 hour lighting is totally out of sync with that vision. Twenty-four hour lighting will influence migrating birds and the year–round wildlife population. It will totally destroy the rural character of that area for the local community.

8|9.2 INFRASTRUCTURE
Noise
• Residential and recreational facilities on S. Millege Ave. will be impacted more than any other sight; first from noise during the initial construction and then from employee traffic and the heating and cooling systems. Again,

Comment No: 1 Issue Code: 24.0
DHS notes the commentor's support for the research to be conducted at the NBAF.

Comment No: 2 Issue Code: 25.2
DHS notes the commentor's opposition to the five mainland alternative sites including the South Milledge Avenue Site Alternative.

Comment No: 3 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.

Comment No: 4 Issue Code: 3.0
DHS notes the commentor's statement. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Section 3.2.3. DHS and USDA would ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and policies.

Comment No: 5 Issue Code: 27.0
DHS notes the information submitted by the commentor.

Comment No: 6 Issue Code: 7.2
DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area.

Comment No: 7 Issue Code: 13.2
Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigation measures, such as the use of shielded lighting and minimum intensity lighting, will be considered in the final design of the NBAF. Mitigation measures would minimize the potential for wildlife 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.

Comment No: 8 Issue Code: 9.2

DHS notes the commentor's noise concerns. The NBAF EIS Section 3.5.3 describes the potential construction and operational conseqences from noise affects at the South Milledge Avenue Site alternative.

Comment No: 9 Issue Code: 12.2

DHS notes the commentor's surface water concerns. The NBAF EIS Sections 3.7.3.2 and 3.7.3.3 describe potential construction and operational consequences including potential permitting and planning requirements for the South Milledge Avenue Site alternative. Section 3.13 describes the proposed NBAF's liquid and solid waste management options. Section 3.7.3.3.1 describes the South Milledge Avenue Site alternative as using 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. As indicated in Chapter 2 Section 2.2.2.5, the NBAF will be required to establish clear procedures for keeping spills from causing ecological or health problems.

Hunter, Nancy

Page 2 of 3

WD0622

please remember that the local residents of Athens-Clarke County have overwhelmingly voted to keep this area rural which is not in keeping with an NBAF.

Water

9|12.2

- S. Millege Ave. is closer to surface water than any of the other sites, so the potential negative effects are greater.
- Georgia is in a 100-year drought. This is mentioned in the EIS report but the report states that other water sources are currently being discussed so that by the time the facility is built the water issue will be mitigated. If DHS was counting on the Hard Labor Creek Reservoir in Oconee County I hope they are aware the plans for building that reservoir have just been dropped.
- Nowhere is it mentioned how much water will used to produce the electricity to run the facility. The water to produce that electricity will also be coming from drought-stricken Georgia.

7Cont.|13.2

BIOLOGICAL RESOURCES

- Construction on the S. Millege site will destroy wetlands and some hardwood forest.

SOCIO-ECONOMIC

Accidental Release

10|21.2

- The S. Millege Ave. site is again mentioned as having a climate that significantly increases the risk of Rift Valley Fever becoming established in the event of an accidental release. Our large tick and mosquito populations do not die off in Georgia's mild winters.

TRAFFIC AND TRANSPORTATION

11|17.2

- S. Millege Ave. is again mentioned as already having poor traffic flow and would be affected by construction and operation. The report states that the Georgia DOT-recommended modifications would help minimize those effects. Does that mean a 4 lane highway through our Green Belt?

HEALTH AND SAFETY

- All sites are at moderate risk for an over-pressure fire.

10Cont.|21.2

- The EIS states that accidental or intentional release of pathogens is none to low. I find that statement amazingly arrogant. The most technologically well-designed, facility in the world cannot prevent human error. A recent study indicated that some of the major disasters in recent history may have been caused by lack of sleep - Three Mile Island, Chernobyl Nuclear Disaster and the Exxon Valdez oil spill to name a few. In the last month the media reported on a major security breach and a planned security breach at two similar labs.

12|1.0

- The General Accounting Office did not find any compelling reason to risk building this type of facility on the mainland.

TAXPAYER MONEY AND STRESS

13|15.0;
14|24.1;
2 Cont. |25.2

Although this was not a category list in the EIS, I can't help but wonder how much money has been spent so far on employee time (federal and local) in meetings, sending out requests to determine interest, responding to that query, meetings and correspondence between officials, site visits, planning for and carrying out scoping meetings in every potential site. The Federal government's portion alone would probably have paid for the extra cost of building a new facility on the over 800 acres already owned by the government on Plum Island. The only site the GAO still recommends for studying deadly pathogens.

As an average citizen who thinks all the risks and negative impacts listed above outweigh the benefits to my community, it saddens me to be in this position. I would expect UGA to mainly focus on the financial and status benefits this project would bring to them. I had higher hopes for our elected officials.

Comment No: 10 Issue Code: 21.2

DHS notes the commentor's concerns regarding an accidental release of a vector, such as a mosquito, from the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. 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: 11 Issue Code: 17.2

DHS notes the commentor's concern about the traffic congestion in the area of the South Milledge Avenue Site Alternative and the future impact of the NBAF operation on the area's transportation infrastructure. A discussion of the planned improvements to the area's primary transportation corridors of South Milledge Avenue and Whitehall Road to alleviate current and future traffc congestion resulting from the NBAF operation at the South Milledge Avenue Site Alternative is located in Section 3.11.3.3.1 of the NBAF EIS. All planned improvements are per the recommendations of the Department of Transporation and the Public Works Department.

Comment No: 12 Issue Code: 1.0

DHS notes the commentor's position 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: 13 Issue Code: 15.0
DHS notes the commentor's statement; however, it is not within the scope of the NBAF EIS, which evaluates the environmental impact of the no action alternative and the alternatives for constructing and operating the NBAF."

Comment No: 14 Issue Code: 24.1
DHS notes the commentor's statement.

Hunter, Nancy

Page 3 of 3

WD0622

Thank you for your consideration of these concerns,
Nancy Hunter

Hunter, R. Vernon

Page 1 of 1

WD0098

From: Vernon Hunter [redacted]
Sent: Wednesday, July 23, 2008 1:18 PM
To: nbafprogrammanager@dhs.gov
Subject: NBAF

Dear Sir or Madam,

1| 25.3 As a life-long citizen of NC I am opposed to the proposed National Bio- and Agro-Defense Facility (or "NBAF"). I see great risks in having a lab studying biohazardous animal diseases in
2| 21.3 an area with an extremely high deer population. I am also very concerned with discharges
3| 12.3 directly to a tributary of Raleigh's drinking water supply, Falls Lake.

Sincerely,

- R. Vernon Hunter

[redacted]

Comment No: 1 Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 21.3
DHS notes the commentor's concern. A discussion of the potential effects to deer populations from pathogens is included in Section 3.8.9 of the NBAF EIS. A worst-case scenario in which deer become infected with the FMD virus, disease-induced mortality and depopulation control measures could result in loss or reduction of local deer populations. However, from a historical basis, the effects of FMD on wild deer populations throughout the world are limited in that the virus burns it self out. In either case, white-tailed deer are capable of rapid population growth and would recover in time. The effects to the local community would be primarily economic in nature, from loss of livestock product export and recreational hunting (see Section 3.10.9).

Comment No: 3 Issue Code: 12.3
DHS notes the commentor's concerns regarding water supplies. The NBAF EIS Section 3.7.7.3.1 describes operational surface water affects at the Umstead Research Farm site. The NBAF EIS Section 3.3.7 describes the Umstead Research Farm site's infrastructure and NBAF EIS Section 3.13.8 describes liquid and solid waste managment.

Hutchby, Elizabeth

Page 1 of 2

MD0017

July 25, 2008

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

Dear Dr. Johnson,

1| 1.0 It seems obvious that it is your considered opinion that bio-agricultural research and bio-weapons research are necessary. How do you distinguish between the two? What are your reasons? Are you only doing this to comply with Pres. Bush's order?

Research for cures for diseases is valuable. As a survivor of polio, I understand the thrill of knowing that immunization can prevent diseases. **Prevention is still worth a pound of cure!**

2| 25.3 Research for the purpose of creating bio-weapons is totally barbaric. I am, therefore, opposed to the U.S. Dept. of Homeland Security Science and Technology Directorate's placing a National Bio and Agro-Defense Facility in Butner, NC. Before you think further about Butner or bio-agro labs, consider the facts, ethics, historical weapons research, and common sense community concerns.

1 cont.| 1.0 Take a long look at the power you are giving to disease. "Contamination" is a frightening word. To prevent contamination, from the receipt of little boxes of pathogens, this country is spending years of employee hours, billions of tax payer dollars, and expending the energy of brilliant minds defending the need for weapons and creating more. Like many many other expenditures of the Department of Defense, this proposal is wasteful.

3| 23.0
4| 8.3
5| 19.3 First, you have to clean-up the site of old ordinances/weapons left in the ground as a result of training for war, hoping no one gets killed or maimed. Then you have to build the entire infrastructure of a city to support a space as small as a shopping center without any assurance that the water treatment facilities will screen out the pathogens of disease, thus poisoning the drinking water for millions downstream.

Because I have experienced years of lies from the current federal governmental administration, I have no reason to believe it is really necessary to further research or design biological weapons. I strongly oppose the United States' further developing more weapons of mass destruction. Ethically, we must stop the momentum of killing. Let history guide us. Take note that the "US had made a huge investment in time, mind and money ($2,000,000,000 in 1940 dollars) to produce the bombs" that were dropped on Hiroshima and Nagasaki. . .there was no inclination-and no guts-to stop the momentum."

1 cont.| 1.0 "An estimated 80,000 innocent civilians, plus 20,000 young essentially weaponless Japanese conscripts, died instantly in the Hiroshima bombing. Hundreds of thousands suffered agonizing burns, leukemia and infections for the rest of their shortened lives, and generations of the survivor's progeny inherited horrible radiation-induced illnesses cancers and premature death. What has been covered up is the fact that 12 American Navy pilots, their existence well known to the US command, were incinerated in the Hiroshima jail on Aug.6.

The 75,000 Nagasaki victims were virtually all innocent civilians, except for the inhabitants of an allied Pow camp near Nagasaki's ground zero. They were incinerated, carbonized, then evaporated, by a scientific experiment carried out by obedient, unaware soldiers. The War Dept. knew of the existence of the POW's but, when informed, simply replied: "Targets previously assigned for Centerboard (atomic bomb mission code name) remain unchanged." (Kohls, G, "Whitewashing Hiroshima: The Uncritical Glorification of American Militarism")

If the bombs had not been developed, we wouldn't have dropped them. I'm not faulting scientists for being curious. As Hope Taylor said, "There's an invisible fine line between offensive and defensive use of research." The risks of accidental poisoning is too high. Do what you can to StOP the momentum to develop bio-weapons. Let the future thank us for spending our great minds, money, and time for public good, for finding cures for disease, not for creating more diseases. Let's make peace as contagious as fear.

The following are among the many other reasons you should refuse to continue this research:

Comment No: 1 Issue Code: 1.0

DHS notes the commentor's concern about the mission of the NBAF. 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. NBAF activities, operations and research would be performed solely for scientific research and biodefense purposes. No bioweapons research would be conducted.

Comment No: 2 Issue Code: 25.3

No bioweapons research would be conducted as stated in Section 1.1. DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 3 Issue Code: 23.0

DHS notes the commentor's concerns regarding the past use of the land on which the Umstead Research Farm site is designated. Section 3.2.7 of the NBAF EIS provides information specific to the Umstead Research Park site on the historical and current land use, local zoning and regulations that impact the site, and the projected impacts on the site and adjoining properties resulting from the proposed installation of the NBAF. If NBAF were to be constructed at the site, all appropriate steps would be taken to undertake construction in a manner calculated to meet public and workplace health and safety requirements.

Comment No: 4 Issue Code: 8.3

DHS notes the commentor's statement.

Comment No: 5 Issue Code: 19.3

DHS notes the commentor's concern. The impact from the proposed operation of the NBAF at the Umstead Research Farm Site on the local sanitary sewage system capacity and infrastructure is discussed in Section 3.3.7.3.4 of the NBAF EIS. Decontamination (killing or inactivation of bacteria and fungi and viruses, respectively) procedures have a long and proven history of effectiveness when facilities are well maintained and procedures followed. The design and operation of the NBAF at the Umstead Research Farm Site would prevent negative impact to the Sewage 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.

Hutchby, Elizabeth

Page 2 of 2

MD0017

6| 23.0

1. North Carolinians demand sustainable, clean, safe, "green" facilities. How can we tell from the proposal you offer that the National Bio and Agro-defense Facility will be clean, green, or safe? What will the design be for the proposed facility?

7| 12.3

2. North Carolina continues to be in a drought. According to the Clean Water News, dated 5/24/01 "Governor Easley has previously committed to strengthening enforcement of water pollution permits through the NC Department of Environment and Natural Resources (NC-DENR); however, in the face of the state's budget shortfall, resources for environmental enforcement are in jeopardy."

8| 23.0

3. How do you justify extracting thousands of gallons of water per day? Our nuclear power plant already extracts 32,000gallons of water a minute. By the time you build your own water tower, electricity production, and/or water treatment facility, sending your waste to the Granville treatment facility, there may not be available water for your use in experimentation. How will this complex interaction be monitored for safety? What alternative sources of energy have you designed to power your facility in case of a power outage?

9| 2.0
10| 21.3
11| 23

4. In what ways are you being transparent about the research that will be carried out in this facility? How do you plan to manage the high risk of human error in every aspect of this research? Who will sign off on the incoming substances? Will all mail carriers be oriented to handle hazardous materials? Will all curriers know what they are carrying?

12| 18.3

5. Are you aware that back in 2001, North Carolina had trouble enforcing the Clean Water Act? NCPIRG, Clean Water Fund of North Carolina, and Haw River Watch released a report stating the finding that 64% of the NC facilities in Significant Violation of the Clean Water Act for the period were wastewater treatment plants. (Durham County-Triangle and Butner were violators during that period.) Assuming that you are still planning to pass along your wastewater, what extra precautions will you have in place when disposing of diseased waste? How will the water of the community be protected?

1 cont.| 1.0

6. Considering the many years of hearing about weapons of mass destruction that really didn't exist, it is obvious that air-borne diseases can change the environment for **all** species, therefore please explain, again, why you think your experimentation is needed. There are seven institutions close to the proposed site. It is irrational and cruel to think that a National Bio and Agro-Defense Facility laboratory would be placed in or near non-ambulatory patients, prisoners, and the mentally ill, creating the suspicion that, once again, the U. S. might be tempted to secretly use these individuals in experimentation during biological warfare research. It is cruel to think we are discussing its possibility.

7. Historically," the Nagasaki bomb was a plutonium bomb and Hiroshima's was uranium. Scientific curiosity certainly was a major factor for the mass slaughter of the Nagasaki community. The decision to use both bombs had obviously been made well in advance. Plus, the US had made a huge investment in time, mind and money ($2,000,000,000 in 1940 dollars) to produce the bombs, and there was no inclination - - -and no guts- - -to stop the momentum. After WWII, Admiral William Leahy, top military aide to President Truman, said in his war memoirs, I WAS THERE: "It is my opinion that the use of this barbarous weapon at Hiroshima and Nagasaki was of no material assistance in our war against Japan. My own feeling is that in being the first to use it, we had adopted an ethical standard common to the barbarians of the Dark Ages." General Eisenhower agreed. (Kohls, G.)

It is, therefore, my considered opinion that the proposed National Bio and Agro-Defense Facility is an insane expectation of Pres. Bush. The United States, nor any other state need fear if we model the reduction of weapons of mass destruction rather than creating them.

I call on you to lead with courage, STOP the momentum of the development of bio-weapons; encourage life. May you think PEACE each time you take a breath of fresh air and drink clean drinking water.

Sincerely,

Elizabeth R. Hutchby

Elizabeth R. Hutchby (Lib)

[redacted]

[redacted] NC [redacted]

Comment No: 6 Issue Code: 23.0

DHS notes the commentor's concern for green and safe facility design, such as Leadership in Energy and Environmental Design (LEED) certification. As discussed throughout the NBAF EIS, DHS is committed to implementing a low impact design (LID) approach for NBAF so as to minimize the facility's impact on the landscape. DHS will document, review and incorporate all appropriate new and/or revised information for the NBAF final design. 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.

Comment No: 7 Issue Code: 12.3

DHS notes the commentor's water supply concerns and DHS acknowledges current regional drought conditions. As described in theSection 3.7.7.3.1 of the NBAF EIS, the South Granville Water and Sewer Authority has 3 to 4 million gallons per day of excess potable water capacity and could meet NBAF's need of approximately 110,000 gallons per day, less than 0.4% of the Authority's total current capacity. The NBAF potable water usage is comparable to 210 residential homes' annual potable water usage.

Comment No: 8 Issue Code: 23.0

DHS notes the commentor's question regarding the operation of the NBAF in the event of an electrical power outage. In the event of loss of the primary electrical feeder to the site, power would automatically transfer to the redundant electrical feeder without interruption of power to the NBAF. In the event of the loss of both the primary and redundant electrical feeders the emergency generators would start and restore power to the NBAF. The emergency generators are powered by fuel oil as stored at the NBAF site. The fuel storage has been sized to allow normal operation of hte NBAF for a 30 day period in the unlikely event of the loss of natural gas and both the primary and redundant electrical power feeders. In the event that only the electrical service is lost, the fuel storage would support the emergency generators for up to 60 days depending of the season. Should the power outage persist for an extended duration and replacement fuel oil not be available, procedures would call for the safe shut down, disinfection and quarantine of all NBAF pathogens.

Comment No: 9 Issue Code: 2.0

DHS notes the commentor's questions regarding the public availability and transparency of NBAF research. There would no classifed research at the NBAF, however there may occassionally 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.

Comment No: 10 Issue Code: 21.3

DHS notes the commentor's concern regarding the potential consequences from a NBAF accident or pathogen release as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the

handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B of the NBAF EIS provides a comprehensive list of BSL-3 and BSL-4 laboratoryaccidents results, and consequences of theaccidents Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. 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.

Comment No: 11 Issue Code: 23.0

DHS notes the commentor's concerns regarding the handling and transport of packages containing pathogens. The general regulations governing the required NBAF handling and transport of packages containing pathogens, and a discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. Section 2.2.2.3 provides detailed information on the handling and transport of packages containing pathogens. Additionally, an analysis of accidental releases during transportation is provided in Section 3.14, Health and Safety and Appendix E of the NBAF EIS. Information regarding the existing road conditions and potential effects to traffic and transportation from the Umstead Research Farm site is provided in Section 3.11.7 of the NBAF EIS. 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. With regard to the shipment of pathogens, no specific transportation corridors have been

evaluated. Should a decision be made to build NBAF and a site selected, transportation routes would be identified in accordance with a standard shipment procedure with the route optimized for safety and security.

Comment No: 12 Issue Code: 18.3

DHS notes the commentor's concern. Section 3.13.2.2 of the NBAF EIS addresses the wastes that will be generated by the operation of the NBAF EIS. Table 3.13.2.2 lists types, origins of, and pretreatment requirements applicable to the waste streams that will be discharged to the sanitary sewer. As shown on the table and described in the NBAF EIS, all of the potentially infectious waste streams to be discharged would enter a dedicated treatment system that involves thermal treatment (sterilization) followed by subsequent decontamination. In accordance with Biosafety in Microbiological and Biomedical Laboratories, documentation of the decontamination of liquid wastes generated in BSL-4 areas, and physical and biological validation of the decontamination process is also required.