### Johnson, Galen

# Page 1 of 1

PD0089

August 18, 2008

1|25.4; | This is Galen Johnson, Kansas. I'm a beef producer. I believe it's a bad idea to 2|24.1 | put this facility in Manhattan. It should be kept on Plum Island where it is more secure.

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: 24.1

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

**2-1315** December 2008

# Johnson, Ralph

# Page 1 of 2

NOW U.S.	SPARTME CAND SEC	National Bio and Agro-Defense Facility Draft Environmental Impact Statement Comment Form
		Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.
	ATIONAL BIO AND AGRO-DEFENSE FACILITY Science and Technology Directorate/Office of National Laboratories	Name: Ralph Johnson  Title: Assoc. Vice President for Physical Plant  Organization: University of Georgia  Address:  City: State: GA Zip Code:  Comments: These comments are provided, not in my official  Organization with the University of GA, but rather as an  individual with over 3 Syears of facility management  experience. (24 years with the Us Nery as a Civil Engineer Corps
1  24.2	IONAL BIO AND A	Officer and then 11 years in higher education facilities  Busid on my experience and knowledge of the Athens, 64  area - I would welcome this facility to our town without reservation. Our area has a unique combination of technical and mangrover resource capability that could make the successful emstruction and sake operation
2  8.2	NATIC Science	of this type of facility. Our recent ad again unique experience with the construction and operation of the BSL3(lk) facility on the compus would provide your stoff with neartern experience and suggest.  There is no doubt that this facility could be (Continued on back for your convenience)
l		There is no doubt that this facility could be (Continued on back for your convenience)

Comment No: 1 Issue Code: 24.2

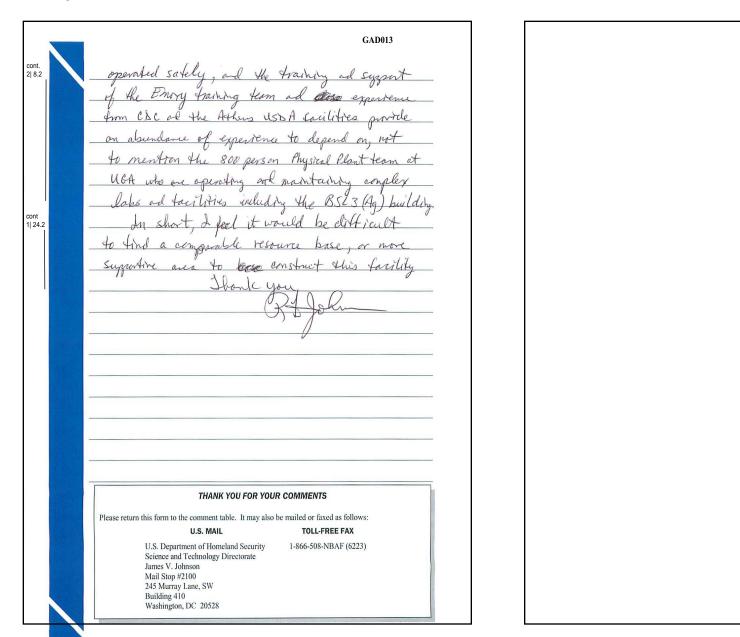
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 8.2 DHS notes the commentor's statement.

**2-1316** December 2008

### Johnson, Ralph

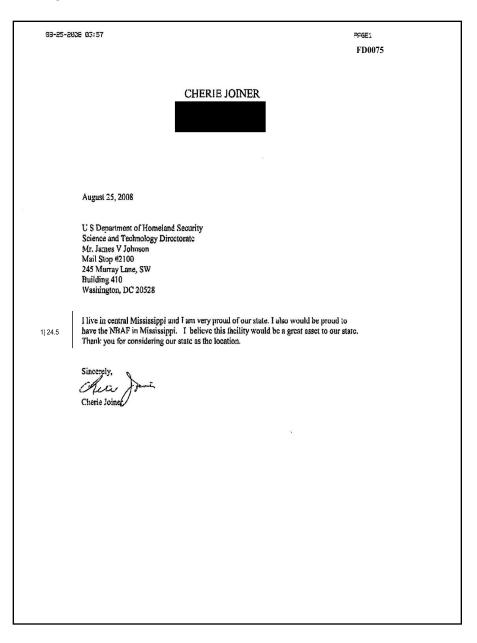
Page 2 of 2



**2-1317** December 2008

### Joiner, Cherie

# Page 1 of 1

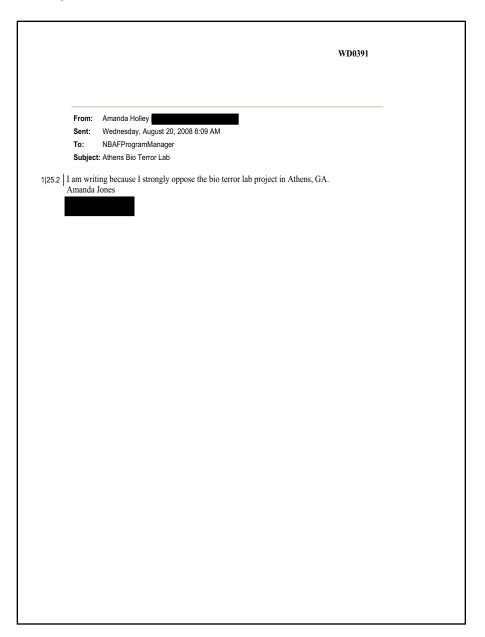


Comment No: 1 Issue Code: 24.5 DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

2-1318

### Jones, Amanda

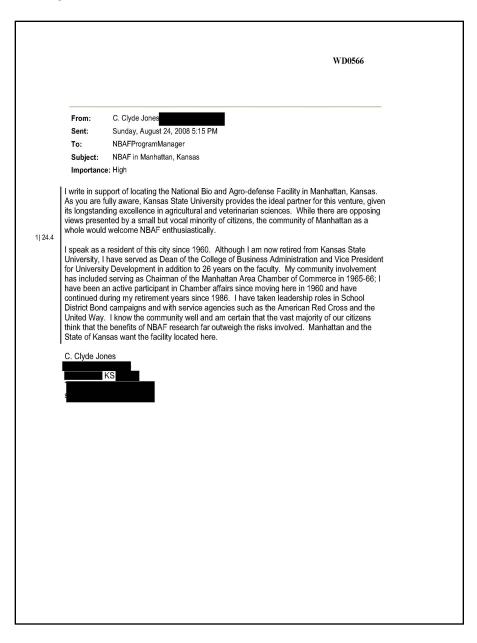
# Page 1 of 1



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

### Jones, C. Clyde

### Page 1 of 1

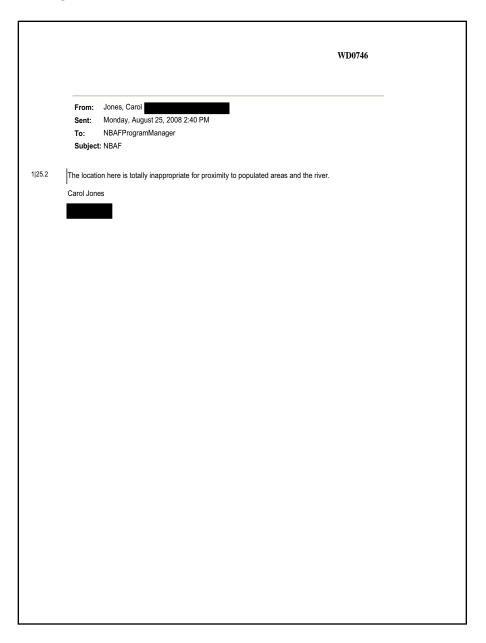


Comment No: 1 Issue Code: 24.4 DHS notes the commentor's support for the Manhattan Campus Site Alternative.

**2-1320**December 2008

# Jones, Carol

# Page 1 of 1



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

2-1321

### Jones, J.R.

# Page 1 of 1

WD0598 From: Sent: Sunday, August 24, 2008 7:01 AM NBAFProgramManager To: Subject: public commnets - NBAF Flora Dear Sir/Madame Mississippi and would be proud to have the facility located in our area. As a Navy veteran, retired supply officer, It would be a privileged to be a part of protecting our nation's security against bioterrorism. The Flora site is a great site. But the support and hospitality you would receive from MS people is even greater. As the automotive industry has discovered MS is the grounds for America's new growth and prosperity. Untold 1Cont.|24.5 untapped natural resources and human capital. Come grow with us. We applaud and appreciate DHS Sincerely, J. R. Jones, President Mississippi Black Chamber of Commerce Get the MapQuest Toolbar. Directions, Traffic, Gas Prices & More!

Comment No: 1 Issue Code: 24.5

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

Comment No: 2 Issue Code: 1.0

DHS notes the commentor's support for the proposed research that would be conducted within the NBAF.

**2-1322**December 2008

### Jones, Pat

# Page 1 of 1

WD0508 From: Pat Jones Sent: Friday, August 22, 2008 2:31 PM To: NBAFProgramManager Mississippi would greatly benefit from such a lab here. We have always done well with undertakings of this magnitude. Everyone will benefit. We need more research on diseases and more solutions found. Our state was the first to have the heart & lung transplants. Mississippibelieveit.com has a lot of our 1| 24.5 accomplishments. We have plenty to offer to draw the people here we need to be successful with this lab. Also, we are a state full of supporters for good causes or growth. I think you'll find that if we are chosen you will have 100% backing. We have resources available from here to Washington, D.C. | Not only will the health issues be tackled but there will be economic growth beyond compare. We all have a vested interest in the improvement of disease control. Sincerely, Pat Jones

Comment No: 1 Issue Code: 24.5

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

Comment No: 2 Issue Code: 1.0

DHS notes the commentor's support for the proposed NBAF.

**2-1323** December 2008

# Jones, Walker

# Page 1 of 1

	WD0851
	From: Walker Randall Jones Sent: Monday, August 25, 2008 8:53 PM To: NBAFProgramManager
1  25.2	I have lived in my entire life and just wanted to add my name to the list of manny who are against the NBADF coming to Athens, GA. No thank you please!
	Walker Jones

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

**2-1324** December 2008

### Jonker, Ph.D., Jamie

# Page 1 of 4

WD0514

From: Jamie Jonker [jjonker@nmpf.org] Friday, August 22, 2008 9:15 AM Sent: NBAFProgramManager To:

Subject:

National Milk Producers Federation Comments on the Draft Environmental Impact Statement for the National Bio and Agro-Defense Facility (NBAF)

Attachments: NMPF\_NBAF\_EIS\_08-25-08.pdf

To whom it may concern:

The National Milk Producers Federation submits the attached comments to the Department of Homeland Security (DHS) on the Draft Environmental Impact Statement for the National Bio and Agro-Defense Facility (NBAF). Please contact me if you have any questions about these comments.

Sincerely, Jamie Jonker

Jamie Jonker, Ph.D. Director, Regulatory Affairs National Milk Producers Federation 2101 Wilson Blvd, Suite 400 Arlington, VA 22201 Phone: 703 243-6111 ext. 344

Fax: 703 841-9328 Web: www.nmpf.org

2-1325 December 2008

#### Jonker, Ph.D., Jamie

#### Page 2 of 4



# **National Milk Producers Federation**

National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111; FAX 703-841-9328

Arkansas Dairy Connerative Assi

Associated Milk Producers, Inc. Continental Dairy Products, Inc.

Cooperative Milk Producers Assn. Dairy Farmers of America, Inc.

> Dairymen's Market Ellsworth Cooperative

Farmers Cooper First District Association

Humboldt Creamers

Just Jersey Cooperative, Inc. Land O'Lakes, Inc Lone Star Milk Producers Inc.

Manitowoc Milk Producers Coop

MD & VA Milk Producers Cod Association In Michigan Milk Producers Assn

Northwest Dairy

Prairie Farms Dairy, Inc. St. Albans Coo

Southeast Milk, Inc Swiss Valley Farms, Co. Tillamook County Creamery Assn.

United Dairymen of Arizona Upstate Niagara Cooperative, Inc. Zia Milk Producers August 25, 2008

U.S. Department of Homeland Security Science and Technology Directorate Mr. James V. Johnson

Mail Stop #2100 245 Murray Lane, SW **Building 410** Washington, DC 20528

Re: Notice of Availability of the Draft Environmental Impact Statement for the National Bio and Agro-Defense Facility (NBAF)

Mr. Johnson:

The National Milk Producers Federation appreciates the opportunity to provide comment on the Department of Homeland Security's (DHS) Draft Environmental Impact Statement for the National Bio and Agro-Defense Facility (NBAF facility) as part of the DHS proposal to close the Plum Island Animal Disease Center (PIADC) and move its biological research laboratory to a new location on potentially on the mainland United States. The National Milk Producers Federation (NMPF), based in Arlington, VA, develops and carries out policies that advance the well being of dairy producers and the cooperatives they own. The members of NMPF's 31 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 40,000 dairy producers on Capitol Hill and with government agencies.

#### Background

Since 1954, PIADC has been responsible for research and diagnosis to protect United States animal industries and exports against catastrophic economic losses caused by foreign animal disease agents accidentally or deliberately introduced into the U.S., including Foot-and-Mouth Disease (FMD). In 2003 the management of the PIADC was transferred from the U.S. Department of Agriculture (USDA) to DHS. The proposed NBAF facility would replace the PIADC facilities for research high-consequence biological threats involving zoonotic (i.e., 1.0 transmitted from animals to humans) and foreign animal diseases. NMPF has worked with 2 8 9 the both USDA and DHS for years on the need for a world class foreign animal disease research center of which the NBAF facility will fulfill

INMPF's primary concern is that the NBAF facility has adequate protection so that no 21.0 accidental release of a disease such as FMD could occur. As such, no matter where it is located, the facility needs to have a large animal biosecurity level 3 and 4 laboratory so that research can be conducted on diseases such as foot-and-mouth disease. One key component of these facilities is that they are adequately funded to remain up-to-date with modern technologies that evolve to ensure that they continue to provide the necessary security against a release of harmful microorganisms.

Jerry Kozak, President/Chief Executive Officer Charles Beckendorf, Chairman

www.nmpf.org

#### Comment No: 1 Issue Code: 1.0

DHS notes the commentor's preference to maintain an upgraded or new Plum Island research facility. The proposed NBAF requires BLS-4 capability to meet mission requirements (DHS and USDA). The NBAF EIS fully analyzes the Plum Island Alternative, which consists of building a new research facility on Plum Island. PIADC does not have BLS-4 laboratory or animal space, and the existing PIADC facilities are inadequate to support a BLS-4 laboratory. Upgrading the existing facilities to allow PIADC to meet the current mission would be more costly than building the NBAF on Plum Island, as discussed in Section 2.4.1 of the NBAF EIS.

Comment No: 2 Issue Code: 8.0

DHS notes the commentor's statement.

#### Comment No: 3 Issue Code: 21.0

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. DHS believes that experience shows that facilities utilizing

2-1326

modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated. Comment No: 4 Issue Code: 2.0 DHS notes the commentor's concerns about the sustainability of funding for NBAF to ensure safe and secure operations. The U.S. Congress and the President are responsible for determining funding priorities for government programs. DHS spends funds in accordance with congressional intent. DHS would maintain the NBAF and ancillary facilities in compliance with applicable environmental, safety, and health requirements and provide for safe operation and maintenance for the life of the facility.

**2-1327** December 2008

#### Jonker, Ph.D., Jamie

#### Page 3 of 4

#### WD0514

5| 15.0

#### |Consequences of an Accidental or Intentional Outbreak of FMD

The cost to the dairy industry of an outbreak of FMD in the U.S. would vary, depending upon the speed of spread and the effectiveness of the response. However, recent epidemiological studies conclude that any outbreak in any region with a concentration of livestock production would likely be quite serious. A 1999 University of California at Davis study estimated that a foot-and-mouth disease outbreak optimistically limited to California's South Valley would result in the destruction of 20% to 100% of the region's dairy herds. Resulting losses of milk production plus the containment and depopulation costs are conservatively estimated at \$325 million to \$1.75 billion, adjusted for 2007 prices. A 2007 study published in the Journal of the American Veterinary Medical Association demonstrated that an outbreak spread through a sale barn or state fair could be multiplied by 10- or 20-fold, as would the dairy industry's cost, to as much as \$30 billion or more. Finally, even a quickly contained foot-and-mouth disease outbreak could close overseas markets to U.S. dairy export sales. These were worth over \$3 billion in 2007, and the loss of these sales would have an additional, disastrous impact on U.S. milk prices.

3 cont.| 21.0

We believe that the experience in the United Kingdom last summer is instructive with regard to the potential hazards in working with highly-contagious microorganisms. Due to plumbing control problems at its Pirbight facility, the foot-and-mount disease virus was inadvertently released into the environment, where it infected commercial farms before it was ultimately contained. This incident should be a cautionary tale of what can happen, even accidentally, when biohazards exist in too close a proximity to concentrations of humans and animals.

Physical barriers such as water around an island can provide an added level of protection as the experience with current facilities at the PIADC has demonstrated. The PIADC has served its purpose and has not resulted in any release of foot-and-mouth disease to the domestic animal population since its existence. While the facility is rather dated, it certainly has the advantage of being isolated by water from the mainland as an added precaution against unintentional introduction of foot-and-mouth disease into the U.S. animal population. In addition, the NBAF Draft Environmental Impact Statement acknowledges that:

6| 24.1

- Plum Island currently performs much of the existing research and houses the existing workforce assessing potential threats to animals from foreign animal diseases and zoonotic diseases; and
- Plum Island currently fulfills a portion of the goals and mission identified for the NBAF and meets some of the NBAF criteria, including having a skilled workforce in a BSL3 environment.
- The Plum Island Site has only minor or negligible potential adverse effects for normal
  operations for most of the identified resources and significant potential beneficial
  effects.

These demonstrated advantages are something that can be taken advantage of by building the new NBAF facility on Plum Island.

#### Conclusion

In summary, an outbreak of foot-and-mouth disease, from either an intentional or unintentional release of the virus, would have a catastrophic impact on the U.S. dairy industry. The potential for such an occurrence must be minimized through any means

Jerry Kozak, President/Chief Executive Officer

Charles Beckendorf, Chairman

www.nmpf.org

#### Comment No: 5 Issue Code: 15.0

As specifically stated in Appendix D, Section D.1 of the NBAF EIS, the assessment was limited to a case study and literature review as the basis for estimating the potential losses to the U.S. economy if one of the pathogens proposed for study at the NBAF were to be released into the surrounding environment. Impacts to the dairy industry were included in several of the studies cited in the Appendix. The impact assesment, and literature review on which it was based, was not intended to be comprehensive or exhaustive but was intended only to provide readers with a summary of the range of possible outcomes of a pathogen release

#### Comment No: 6 Issue Code: 24.1

DHS notes the commentor's opposition to the five mainland site alternatives and support for the Plum Island Site Alternative. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island has a lower potential impact in case of a release, the probability of a release is low at all sites. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. The proposed NBAF requires BSL-4 capability to meet mission requirements (DHS and USDA). PIADC does not have BSL-4 laboratory or animal space, and the existing PIADC facilities are inadequate to support a BSL-4 laboratory. Upgrading the existing facilities to allow PIADC to meet the current mission would be more costly than building the NBAF on Plum Island, as discussed in Section 2.4.1 of the NBAF EIS.

2-1328

### Jonker, Ph.D., Jamie

# Page 4 of 4

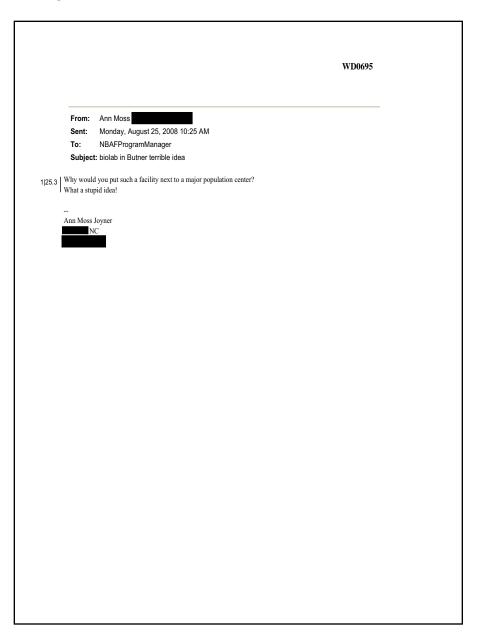
# WD0514 possible. Therefore, all available resources necessary to prevent an outbreak must be 6 cont.| 24.1 provided to ensure that facilities are up-to-date with the latest modern technologies and that research can be conducted to enable government and industry representatives to contain any outbreak that should occur. NMPF prefers to maintain an upgraded or new Plum Island research facility as the new NBAF site. Thank you again for the opportunity to provide input to this important decision. If you have any questions or need additional information, please contact me. Sincerely, Jamie S. Jonker Director, Regulatory Affairs Jerry Kozak, President/Chief Executive Officer Charles Beckendorf, Chairman

www.nmpf.org

**2-1329** December 2008

### Joyner, Ann Moss

# Page 1 of 1



Comment No: 1 Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative. As described in Section 2.3.1, DHS's site selection process incorporated site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in subburban or sem-urban areas. 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.

**2-1330** December 2008

#### Joyner, Ophelia

#### Page 1 of 1

MD0110 8-19-08 To Whom I may concern. I do not want the Bio fat. In Butner 1. Que to the elderty 2/20.3 | Reaple here also the residents treated in the Facilities such as Central Mental Logital Muchoch Rendesped, frison and other plants. Water and who will supply water and freating the wester production the discharge the Waster into the steams going into Bution, water in to the steams going into Bution, Relief. Overlan and on althour from these .

The Scienters and worders there . no matter how secure the disease are no matter now weever, in we are they can controlled they are human and they can controlled they are to as we are took grefert make a mistake to as we are took grefert One on sod, Place it tail on Plum Island Surrous poone but God 5/24.1 by water and survey from the main land 3 Ophelie Jaepen I came 195 return on one strut in Butner. The Camp here Was back in 1942. the W. S.A.

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: 20.3

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

Comment No: 3 Issue Code: 12.3

DHS notes the commentor's water quality concerns and DHS acknowledges the current regional drought conditions. 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 Section 3.13.8 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

#### Comment No: 4 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: 5 Issue Code: 24.1

DHS notes the commentor's opposition to the five mainland site alternatives in favor of the Plum Island Site Alternative.

**2-1332** December 2008

#### Kahl, Charlotte

## Page 1 of 1

STARTAGE	National Bio and Agro-Defense Facility  Draft Environmental Impact Statement
FACIL.ITY Laboratories	Personal Information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Blo and Agro-Defense Facility Environmental Impact Statement.  Name:
	Comments:  San fatoric has the largest but population in the world. Endangering them would be Critical to your Sw US.  Jefas has the largest migratory bird fly ways in the US. Endangering those would effect not only the US but have international consequences
NATTONAL BI Science and Techn	Texas has a regully growing ferol hos population.  Texas also has many exotic game runches which  may speed or slow dissemination of disease
	(Continued on back for your convenience) Sink before Hug 25, 408

Comment No: 1 Issue Code: 13.6

DHS notes the commentor's concern regarding wildlife impacts at the Texas Research Park Site. Section 3.8.9 of the NBAF EIS provides a detailed analysis of the potential impacts of an accidental release on wildlife. Data indicate that birds and bats are not susceptible to any of the diseases that have currently been idenitified for study at the NBAF. Based on the current list of diseases that could be studied, the NBAF would not be likely to have adverse effects on migratory birds and bats. The presence of feral hogs at the Texas Research Park Site is acknowledged in Section 3.8.8.1.4 of the Final EIS. The susceptibility of feral hogs to FMD, Rift Valley fever, and Nipah were addressed in Section 3.8.9. This information was used in the risk assessment described in Section 3.14.4.6. Exotic game ranches in Texas contain additional ungulate species that could be susceptible to the diseases that could be studied at the NBAF. Potential effects on exotic ungulates would be the same as those described for livestock (Section 3.10.9) and native wild ungulate species (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). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

**2-1333** December 2008

#### Kallins, Gail

#### Page 1 of 1

WD0728 on behalf of gail kallins From: Monday, August 25, 2008 1:28 PM Sent: NBAFProgramManager To: Subject: NBAF in Athens, Georgia Dear NBAF Program Manager, 1|25.2 I oppose the building of the NBAF facility in Athens, Georgia, for many reasons. Environmentally, I am concerned about the possible release of pathogens and the incineration of animal carcasses. Ecologically, I fear that the habitats of birds and wildlife will be compromised. Aesthetically, I am overwhelmed with sadness at the thought that the view of those pristine rolling hills of pastureland will be ruined by the façades of massive buildings. 4|7.2 Please build the NBAF elsewhere. Sincerely, Gail Kallins

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 21.2

DHS notes the commentor's concerns regarding the risks associated with a pathogen release. 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. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated.

DHS notes the commentor's concern regarding the impacts from animal carcass disposal. Section 3.13 of the NBAF EIS describes the processes that would be used to control and dispose of liquid and solid waste from the NBAF, with Sections 3.3 and 3.7 of the NBAF EIS describing the standard methods used to prevent and mitigate potential effects of spills and runoff. Since the method of carcass disposal has not yet been determined, the effects of alkaline hydrolysis, incineration, and rendering were included in the analysis presented in Section 3.13 of the NBAF EIS. Incineration has

**2-1334** December 2008

the potential to affect air quality, so the evaluation in Section 3.4 (Air Quality) of the NBAF EIS assumed only incineration would be used to assess the greatest adverse effect . Alkaline hydrolysis would have the greatest effect on sanitary sewage capacity, Section 3.3, so the sanitary sewage effects were determined using this method.

#### Comment No: 3 Issue Code: 13.2

DHS notes the commentor's concern regarding wildlife in the vicinity of the South Milledge Avenue Site. As described in Section 3.8.3.1.4 of the NBAF EIS, the NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and Whitehall Forest. Section 3.5.5.3 addresses operational noise impacts associated with the proposed NBAF. Minor noise impacts would result from an increase in traffic and operation of the facility's filtration, heating, and cooling systems. Section 3.5.5.3 describes noise-attenuating design features that would minimize noise emissions. In the event of a power outage, operation of back-up generators could have a short-term impact on wildlife by discouraging utilization of immediately adjacent habitats. Routine operations at the NBAF would not be likely to have significant noise impacts on wildlife. Security requirements at the proposed NBAF would require continuous outdoor nighttime lighting. Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. 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, will be considered in the final design of the NBAF. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. However, the use of shielded lighting would minimize the potential for impacts in adjacent habitats. Given the relatively low profile of the building and the use of mitigative measures, significant lighting impacts on migratory birds would not be likely to occur. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-ofthe-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign

**2-1335**December 2008

introduction.	
Comment No: 4 Issue Code: 7.2	
DHS notes the commentor's concern regarding the visual effects of the NBAF at the Sout Avenue Site, which are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that would be a distinctive visible feature and would alter the viewshed of the area.	h Milledge t the NBAF
would be a distillctive visible leadure and would after the viewshed of the area.	

**2-1336** December 2008

# Kane, Eileen

# Page 1 of 1

PD0087 August 17, 2008 1|25.4 | My name is Eileen Kane and I live in having this located in Manhattan. Kansas and I am adamantly opposed to 2|21.4 | I do not want the risk. 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: 21.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative. 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 risk of an accidental release of a pathogen is extremely low.

**2-1337** December 2008

#### Kanehl, Donald

#### Page 1 of 1

WD0065 From: Donald Kanehl Sent: Friday, July 11, 2008 12:29 PM To: NBAFProgramManager Subject: SUSPECT: Dear Sir 1| 17.1 Have you driven on Long Island? It is nearly impossible to get on or off, because the traffic is so dense. If Plum Island had a bacterial problem, whereby an east or northeast wind blew the contaminants onto 2 19.1 neighboring Long Island, how would these residents evacuate? Plus, the population here is increasing. Plum Island's bacteria could potentially effect 100,000s of Suffolk 3| 15.1 County residents. If all of Long Island wass affected over 3 million people would be victimized. In summary, Plum Island's facilities should be downgraded, not upgraded. Maybe turn that Island into a prison 4| 25.1 camp. It would create jobs, plus isolate those law-breaking slimebags from the rest of society. Yours truly.

Comment No: 1 Issue Code: 17.1

DHS notes the commentor's concern. A discussion of existing road conditions and potential effects to traffic and transportation are located in Section 3.11 of the NBAF EIS. Traffic on eastern Long Island has increased an average of 2.9% annually since 1993. The number of employees on Plum Island with the NBAF would increase from 200 to between 250 and 350. Currently, about 50% of the workforce commute from New York and the other 50% from Connecticut. The NBAF would result in only a small increase of daily traffic on Long Island roads.

#### Comment No: 2 Issue Code: 19.1

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Chapter 3, Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Chapter 2, 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 Chapter 3, 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, oversite of NBAF operations, as described in Chapter 2, 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 Animal Research Policy and Institutional Animal Care and Use Committee (APHIS). Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Plum Island Site Alternative is provided in Chapter 3, Section 3.11.6 of the NBAF EIS. An emergency response plan, which would include area evacuation plans, would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations.

**2-1338** December 2008

Comment No: 3 Issue Code: 15.1

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 suburban or semi-urban areas. Nevertheless, it has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 4 Issue Code: 25.1

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

**2-1339** December 2008

#### Karis, Margaret

#### Page 1 of 1

WD0330 From: Monday, August 18, 2008 4:19 PM NBAFProgramManager To: Subject: Expansion of Plum Island August 18, 2008 DHS Program Manager 1|25.1; | Please DO NOT expand toxic research at Plum Island. Too many people live within 100miles of 2|21.1 | this location. Errors can occur and would not be good for Homeland health. Thank You. Margaret Karis RN,BS, MPH

Comment No: 1 Issue Code: 25.1

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

Comment No: 2 Issue Code: 21.1

DHS notes the commentor's concerns regarding the risks associated with a pathogen release. 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. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated.

**2-1340** December 2008

### **Kastner**, Curtis

# Page 1 of 1

WD0214 From: Chad Bettes Friday, August 08, 2008 11:53 AM NBAFProgramManager To: Subject: Support for NBAF at Kansas State University From: Curtis Kastner, <a href="mailto:ckastner@ksu.edu">ckastner@ksu.edu</a> Subject: Support for NBAF at Kansas State University Date sent: Fri, 08 Aug 2008 10:27:07 -0500 As director of the Food Science Institute at Kansas State University I want 1|24.4 to add my support for NBAF being located at Kansas State University. We are extensively involved in research, teaching, and extension programs in food safety and security/protection/defense. For example, we have recently been tasked with establishing curricula and training programs in food safety and defense for the National Center for Food Protection and Defense, one of the Centers of Excellence for DHS. Our activities are synergistic and supportive of the mission of NBAF, and we are committed in working closely with NBAF. Locating the facility at Kansas State University would greatly facilitate interactions to realize the maximum synergy to protect and defend the US food supply. Sincerely, Curtis Kastner \*\*\*\*\*\*\*\*\*\* Curtis Kastner Director, Food Science Institute 216 Call Hall Kansas State University Manhattan, KS 66506 Voice 785-532-1234; FAX 785-532-5861 e-mail: ckastner@ksu.edu

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

**2-1341** December 2008

#### Katterhenry, Janice

#### Page 1 of 1

WD0516

From: Jan Katterhenry

Sent: Thursday, August 21, 2008 10:31 PM

NBAFProgramManager Subject: NBAF in Kansas

I want to express my sincere thoughts and request your consideration of putting the National Bio Defense 1 24.4 Facility (NBAF) in Kansas. I strongly support locating this facility in Kansas

> I grew up in Kansas on a farm that has been in my family for over 100 years and is still owned by my family. In addition, other relatives and friends of mine continue to own farms and/or ranches. I learned many things while growing up on a farm; such as growing my own food, caring for livestock, managing finances and taking care of family and neighbors. As a family, we learned how to work-hard and have fun. We learned how to innovate, adopt and enhance new ideas, and implement new vaccines and new seed lines to protect our livestock and crops as well as improve their performance.

In addition, after graduating from college, I have worked in the animal health industry for a number of years. The companies I worked with collaborated with universities and other companies both nationally and internationally developing new vaccines and improving current vaccines. I know the USDA and other government agencies have regulations to assure that good laboratory practices and good manufacturing processes are followed so the citizens of the United States are protected from the time research begins to the time a vaccine is sold and administered to livestock.

The United States must continue research to ensure the citizens of this wonderful country are protected. It is time that a new national bio-defense facility is built and I believe Kansas is the perfect state for this facility. The citizens of Kansas understand the importance of the activities performed at the NBAF facility. I have toured the Biosecurity Research Institute (BRI) in Manhattan, Kansas. I understand the training they will be conducting at this facility to make certain those working the laboratories know and understand how to follow the best laboratory practices. The BRI facility in conjunction with the expertise in place at Kansas State University along with many animal health companies in Kansas and the surrounding area

would allow for a smooth transition from Plum Island.

I I am pleased that the Department of Homeland Security has recognized the need to expand and improve the National Bio-Agro Defense facilities and consider other sites to meet our countries needs and enhance our nation's capacity to assess potential threats to humans and animals alike. The sooner work can begin on the nation's expanding research needs, the better for the citizens of the United States and I the world. I believe Kansas will provide for the best and fastest route to begin this research along with the 1 cont. | 24.4 | greatest focus and expertise.

Thank you for considering Kansas and considering the thoughts of those living in Kansas.

Sincerely,

2| 1.0

3|8.4

2 cont.| 1.0

Janice Katterhenry

Comment No: 1 Issue Code: 24.4

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

Comment No: 2 Issue Code: 1.0

DHS notes the commentor's support for the proposed research that would be conducted within the NBAF. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

Comment No: 3 Issue Code: 8.4

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

2-1342 December 2008

# Kay, Terry

# Page 1 of 1

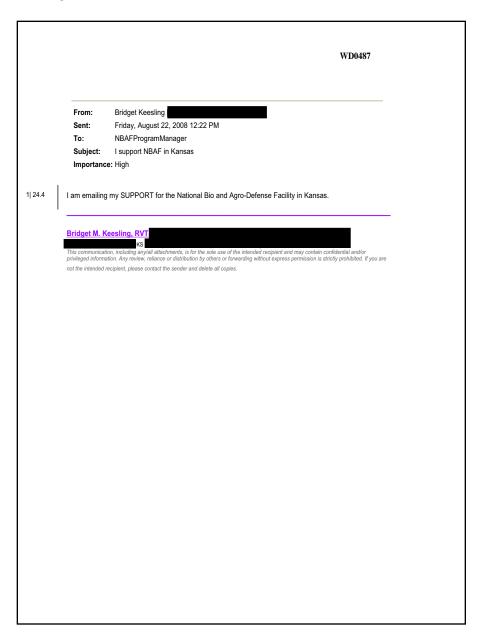
		WD0133	
	From:	Terry Kay	
	Sent:	Friday, August 01, 2008 8:42 AM	
	To: Subject	NBAFProgramManager	
	Subject	: NDAF	
	University	s of observation, I have come to the conclusion that anything finding political favor such as the of Georgia/Athens-Clarke County government's promotion of locating NBAF in the Athens (GA) a disproportional advantage over those in opposition.	
	A single w	ord from a high-ranking official tends to drown out many voices.	
	And that is	how the controversy over NBAF for the potential Athens location appears to me.	
1 25.2	for this cor	being one of the many voices of opposition to this location, I can only hope the Program Manager asideration will pay some attention to those of us who would be directly affected by a decision to acility in Athens.	
	(At one me mission enterprises	nd I live within five miles of the location. Do we trust the generalizations that all will be right? No. seting I attended, several questions of concern were answered by the comment, " it's not in our." I wanted to laugh. Did laugh. I've heard such high-tone explanations from officials of different including the federal government for years. It's something of a mantra to be intoned by the hen pressed on issues.)	
	No.		
	No.		
	Hear my ve	pice among many others saying the same thing: We do not want NBAF in Athens.	
25.2	These work	ds may be a whisper to you; to us, it's a bellowing shout.	
	No!		
	No!		
	Terry Kay		

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

**2-1343** December 2008

### Keesling, RVT, Bridget

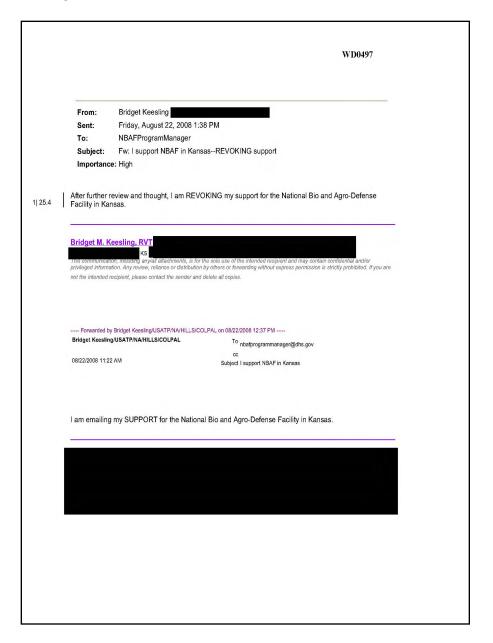
# Page 1 of 1



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

### Keesling, RVT, Bridget

# Page 1 of 1



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

**2-1345** December 2008

# Kelley, Frank

# Page 1 of 1

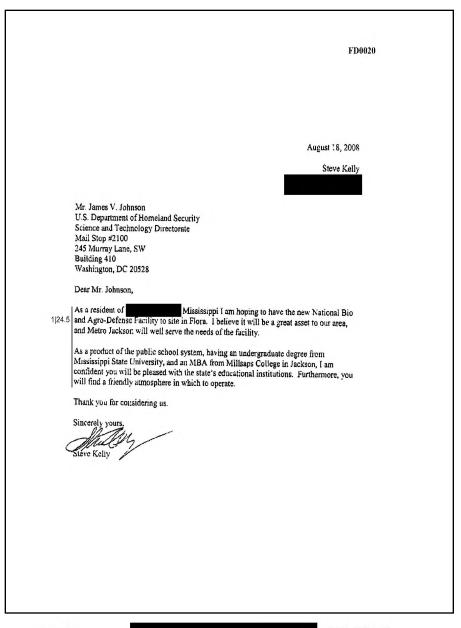
Impact Statement.  Name:   Title:	Person.	National Bio and Agro-Defense Facility Draft Environmental Impact Statement Comment Form  al Information is optional as this document is part of the public record and may be
NATIONAL BIO AND AGRO-DATE City:  State: Mr. Zip Code:  City:  City:  State: Mr. Zip Code:  Comments:  Loan Meel the froject  An Included the following the	reproduction in the control of the c	State: Min Zip Code:
(Continued on back for your convenience)		(Continued on back for your convenience)

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

**2-1346** December 2008

### Kelly, Steve

# Page 1 of 1



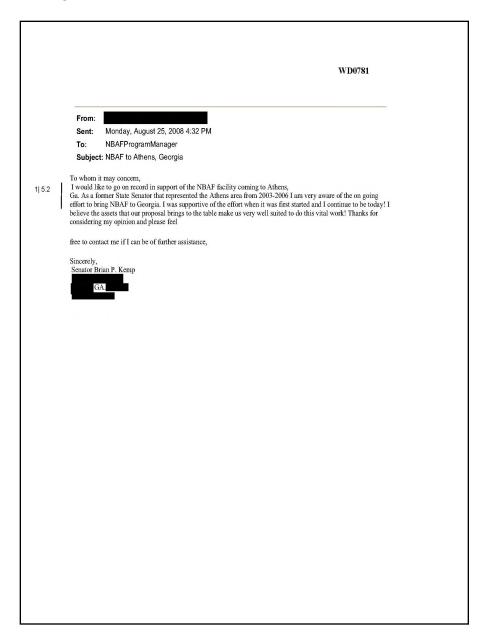
Comment No: 1 Issue Code: 24.5 DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

08/18/2003 12:49 PAGE 01/01

2-1347 December 2008

### Kemp, Brian

# Page 1 of 1



Comment No: 1 Issue Code: 5.2 DHS notes the commentor's support for the South Milledge Avenue Site Alternative.