

Richardson, Evelyn

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PD0079

August 15, 2008

1|25.4; I am Evelyn Richardson and I definitely do not want the bio lab in Manhattan, Kansas. I
2|21.0; think it's a very dangerous situation for our country, no matter where they put the lab,
3|5.0; and you can quote me on that.

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: 21.0

DHS notes the commentor's concern regarding the NBAF. The purpose and need for the proposed action is discussed in Chapter 1 of the NBAF EIS. DHS can not guarantee that the NBAF would never experience an accident. However, as discussed in Section 2.2.1.1, modern biosafety design substantially diminishes the chances of a release as the primary design goal is to provide an adequate level of redundant safety and biocontainment that would be integrated into every component of the building. A discussion of human health and safety is included in Section 3.14.

Comment No: 3 Issue Code: 5.0

DHS notes the commentor's concern.

Richardson, Susan

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WD0169

From: [REDACTED] on behalf of Susan Richardson [REDACTED]
Sent: Monday, August 04, 2008 10:53 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1) 25.2 I want to express my opposition to the newly proposed Bio-Terror Lab's potential location in Athens, GA. I live in a neighborhood that is [REDACTED] from this proposed location, and there are several other neighborhoods (in [REDACTED]) that are very close by. I am aware of recommendations by the outside review board that [REDACTED] recommended a location like Plum Island (where the Bio-terror lab would be more isolated, and less likely to pose adverse health risks to surrounding communities). I would strongly urge that such a suitable location be chosen, rather than the proposed site in Athens that has such close proximity to residual areas, as well as a river that serves as Athens' drinking water source. The Athens, GA site poses too high of a risk of contamination to nearby residents (as well as the entire city of Athens through their drinking water). Please consider a safer venue.
- 2) 24.1
- 3) 12.2

Sincerely,
 Susan Richardson

[REDACTED]
 [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: 24.1

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

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's concerns regarding possible impact to the area's water resources. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to hazardous materials handling, spill prevention, and hazardous waste management. The NBAF EIS Sections 3.13.1 and 3.13.4 describe the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste including methodologies for preventing the release of pathogens and managing the waste stream safely. Sections 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Richardson, Susan

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WD0749

From: [REDACTED]
Sent: Monday, August 25, 2008 2:42 PM
To: NBAFProgramManager
Subject: concerns about proposed NBAF lab

Dear NBAF Program Manager,

I wanted to express to you my concerns about the proposed new NBAF lab in Athens. Some of my concerns arise because my neighborhood (Brittain Estates) is located within [REDACTED] of the proposed site, but my concerns also extend to other surrounding neighborhoods and the [REDACTED] area as a whole.

I work as a scientist (I have a Ph.D. in chemistry) at the U.S. EPA National Exposure Research Laboratory in [REDACTED], and I would normally be enthusiastic about a new research facility coming to town. However, the potential risks involved with the types of pathogens that would be in this new proposed laboratory concern me greatly. I collaborate with several toxicologists (both at other EPA labs and also at a couple of universities), and I know from interacting with them how safety barriers can sometimes fail (and we sometimes experience situations here at my lab, but fortunately, not with the more grave consequences that would occur with an accidental release of high-level pathogens). As an example, I have a toxicologist collaborator who has to maintain his own biological safety hood at his lab at the [REDACTED], and if these filters are not maintained regularly, they can release dangerous substances.

I understand that this kind of research is necessary and important--I just question the proposed location being so close to residential areas, as well as to a substantial population (as Athens at-large). An isolated location (like Plum Island) seems to be a much wiser choice. Labs don't plan on accidents, and they often have elaborate health & safety plans (as we do), but you will occasionally have accidents and accidental exposures. Do we want the potential risk of exposure to high-level pathogens that could endanger our health, as well as the wildlife in our area?

In addition, the proposed location is right next to part of the Oconee River that serves as one of the drinking water sources for greater Athens. The risk in contaminating our drinking water source is another risk that I think is too great. To me, the influx of new jobs and money for our area is not worth putting our community at risk.

I hope that this proposed lab will not find a home in Athens. Right

Comment No: 1 Issue Code: 21.2
 DHS notes the commentor's statement.

Comment No: 2 Issue Code: 19.2
 DHS notes the commentor's concern. Ad escription of the potential for a pathogen or infected vector to spread with an accidental release is included in Section 3.14. Additional effects of a pathogen release to wildlife is included in Section 3.8.9 and the potential economic effects are included in Section 3.10.19 and Appendix D.

Comment No: 3 Issue Code: 12.2
 DHS notes the concerns about the possibility of toxic substances contaminating the source of drinking water for Athens. To manage this risk as effectively as possible, and as stated in Section 2.2.2.5 of the NBAF EIS, 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." Additionally, as stated in Section 3.1: "Disposal of medical, hazardous, and industrial solid waste is governed by federal and state regulations promulgated under the RCRA." The NBAF will be required to comply with each and every applicable waste management regulation.

Comment No: 4 Issue Code: 25.2
 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

1|21.2

2|19.2

3|12.2

4|25.2

Richardson, Susan

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WD0749

4|25.2 |now, Athens is a great place to live. Unintentional releases of
(cont.) |dangerous pathogens could have devastating consequences for us. I don't
|think it is risk we should take.

Thank you for considering my thoughts.
Sincerely,
Susan Richardson

Susan Richardson

GA

Richardson, Zach

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WD0429

From: info@athensfaq.org on behalf of Zach Richardson [REDACTED]
Sent: Thursday, August 21, 2008 1:14 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

Thank you for taking the time to review these emails and take the opinions and concerns of Athens' citizens into consideration.

1| 25.2 | My concern with the proposed building of the Bio and Agro Defense Facility is the negative effects it will have on the Oconee River Watershed.

As a passionate fisherman - perhaps too passionate - I have spend countless hours wading and floating the Oconee River and its tributaries.

2| 12.2 | The construction and everyday practices of the Defense Facility would certainly threaten the very water that I love to fish. The river is already in jeopardy from erosion, storm water runoff, and pollution; the addition of the Defense Facility would only make matters worse.

Bottom line: I have enough difficulty as it is fooling a fish into snacking on my lure. Imagine if there were less fish...

3| 25.2 | Thank you again for reading this email and I hope you will reconsider Athens as a location for your Defense Facility.

Best,
 Zach Richardson

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's concerns regarding possible impact to the area's water resources. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. The NBAF EIS Sections 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects. Section 3.3.3.3.4 describes the local influent limits for the Middle Oconee Waste Water Treatment Plant (WWTP). NBAF would have to meet or exceed sewage acceptance criteria and pretreatment requirements before discharging to the Middle Oconee WWTP. Section 3.13.4 describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste.

Comment No: 3 Issue Code: 25.2

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

Richardson, DVM, Daniel

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WD0558

From: Dan Richardson [REDACTED]
Sent: Sunday, August 24, 2008 6:51 PM
To: NBAFProgramManager
Subject: NBAF in Kansas; support letter

DHS Science and Technology Directorate
 James Johnson
 Mail Stop #2100
 245 Murray Ln., SW
 Bldg. 410
 Washington, DC 20528

To James Johnson,

1| 24.4 I am writing this letter in reference to and support of the efforts to find the most suitable location for the National Bio and Agro-Defense Facility (NBAF). Specifically, I support the location of NBAF in Manhattan, Kansas.

I have been fortunate to serve in several prestigious veterinary medical educational institutions as well as in the animal health industry during my career. After graduating from [REDACTED] University's College of Veterinary Medicine, my educational and career pursuits took me to [REDACTED] University, the [REDACTED] [REDACTED] and [REDACTED] University in [REDACTED]. Ultimately, I found myself back in Kansas, where I was born and raised. I was drawn back to Kansas in no small part because of the tremendous concentration of resources in the biosciences, particularly in animal health and food safety. This, coupled with the forward thinking and collaborative environment of government, academia and industry makes Kansas a very progressive and growing strength in helping insure a safe food supply and healthy society.

I would like to make several points specific to why I support the Manhattan, Kansas site as the best location for the NBAF facility:

- 2| 1.0 • As a veterinarian, I understand very well the disease threats facing American agriculture and, correspondingly, the importance of the NBAF mission. From my experience, this understanding is prevalent in Kansas and is reflected in the broad private and public support that has emerged in support of the NBAF in Kansas
- 1 cont| 24.4 • As a former executive with Hill's Pet Nutrition in [REDACTED] Kansas, I can speak firsthand about the tremendous strength and vibrancy of the animal-health corridor that has made Kansas a global powerhouse in this industry. The concentration of expertise, talent, and infrastructure here is remarkable and would certainly accelerate the achievement of the NBAF's important goals.
- 3| 8.4 • As CEO of the [REDACTED] which is being developed in [REDACTED] Kansas, I assure you the people of this state continue to invest significantly in animal health and food safety — and in a way that is

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 NBAF. 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 information provided by the commentor.

Richardson, DVM, Daniel

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WD0558

3 cont. | 8.4

collaborative and visionary. For example, we are developing our innovation campus, which will be home to the National Food and Animal Health Institute, in the 92-acre Kansas Bioscience Park, which also will be home to companies such as Fort Dodge Animal Health. Here we will leverage [REDACTED] internationally recognized strengths in animal health, food science, and food safety to meet the specific needs of the animal-health industry. We will promote seamless transition from the lab to the marketplace.

- The Kansas Bioscience Park exemplifies the unique, results-oriented environment in Kansas and shows our understanding of the utility of focusing on commercializing bioscience advances to meet real-world challenges. This is exactly the vision Kansas would like to apply to the NBAF mission.

1 cont. | 24.4

Based on DHS' needs — research expertise and infrastructure; workforce talent relevant to the animal health industry and NBAF's needs; and strong community support — Kansas is the only place that can accommodate right from the start. This is the place that can most quickly and effectively provide solutions to protect the American food supply and agriculture economy. Kansas is where NBAF should be located.

Sincerely,

Daniel C. Richardson, DVM, Dipl. ACVS
Chief Executive Officer



Richardson, DVM, Ralph

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WD0432

From: Ralph Richardson [rcr@vet.k-state.edu]
Sent: Thursday, August 21, 2008 11:17 AM
To: NBAFProgramManager
Subject: Support for NBAF in Kansas

1 | 24.4 | I want to remain on record as a strong proponent of locating the NBAF in Manhattan, Kansas. This location provides ready access to a highly-educated, informed workforce who understands the importance of animal disease research, taking pro-active steps to produce vaccines, and other intervention strategies to mitigate and eradicate animal diseases of national concern. In the event of an unintentional or intentional introduction of a trans-boundary disease to the United States, additional resources are readily available at the Kansas site through collaboration with Kansas State University's faculty (e.g., those in the Colleges of Agriculture and Veterinary Medicine) and the scientists already working in the university's Biosecurity Research Institute, a BL3-Ag facility. I understand that a small group of concerned citizens oppose this site, but I strongly encourage the evaluation team to take a careful, objective look at their reasons for their concern. I believe that most of those concerns are unfounded and based on false information (e.g., pet animals would have to be destroyed if FMD escaped from the facility). The United States of America is woefully deficient in a modern-day, high-level containment facility that serves the interests of agriculture, veterinary medicine and, in the case of some zoonotic diseases, public health. This facility needs to be built as soon as possible.

2 | 8.4 |

3 | 4.4 |

4 | 1.0 |

Sincerely,

Ralph Richardson

Ralph C. Richardson, DVM, Dipl ACVIM (Oncology, Internal Med)
 Dean, College of Veterinary Medicine
 Kansas State University
 101 Trotter Hall
 Manhattan, KS 66506-5601
 Phone (785) 532-5660
 FAX (785) 532-5884
 Cell phone: (785) 770-7679

Comment No: 1 Issue Code: 24.4

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

Comment No: 2 Issue Code: 8.4

DHS notes the information provided by the commentator.

Comment No: 3 Issue Code: 4.4

DHS notes the commentator's statement.

All comments received during the 60-day comment period, both oral and written, were given equal consideration in finalizing the NBAF EIS, regardless of how they were submitted. DHS's responses to those comments are included in this Comment Response Document.

Comment No: 4 Issue Code: 1.0

DHS notes the commentator's support for NBAF. As described in Chapter 1 of the NBAF EIS, DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.

Richey, Holli

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WD0862

From: Holli Richey [REDACTED]
Sent: Monday, August 25, 2008 10:04 PM
To: NBAFProgramManager
Subject: agro-defense

1| 5.0 | With all due respect, I must ask, are you crazy? Why on Earth would you want to bring this close to anyone's home? There is no argument for it.

Holli

Comment No: 1 Issue Code: 5.0

DHS notes the commentator's views on risk. 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 with a minimal degree of risk, regardless of the site chosen.

Richmond, Bert

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WD0251

From: Bert Richmond [REDACTED]
Sent: Thursday, August 14, 2008 4:01 PM
To: NBAFProgramManager
Subject: NBAF site in Athens, Georgia

I live in [REDACTED] Georgia and attended my first public hearing today on the proposed site for NBAF being located in Athens.

1|21.2 | I believe the research on the three animal diseases proposed for research at this site is very important. I believe the risk to humans in Athens, Georgia is minimal.

2|2.0 | I am concerned, however, about this research being controlled by Homeland Security. Given the horrendous record of DHS in New Orleans, given the assault on legal rights, privacy, individual rights, human rights that can occur through the irresponsible actions of political leaders who choose to invoke Security to violate all of these rights, I am very anxious about placing potential hazards under any national organization that purports to exist for "our security". I would be quite happy to have such a facility as proposed located here in Athens if it were under the control of scientists responsible only to USDA.

Bert O. Richmond

Comment No: 1 Issue Code: 21.2

DHS notes the commentor's statement.

DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen.

Comment No: 2 Issue Code: 2.0

DHS notes the commentor's statement. Chapter 1, Section 1.1 of the NBAF EIS identifies DHS's mission which is to study 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.

Richter, Linda

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PD0046

August 6, 2008

1| 5.0 | This is Linda Richter. My number is [REDACTED]. I live in [REDACTED], Kansas. I'm a retired political scientist and I have read the GAO report which suggests that the NBAF should be on an island and not in the mainland at all - certainly not near a retirement home, a university, and a military installation.

2| 21.4 | It could also do irreparable harm if there were any accidents to all of our agriculture in the area.

3| 21.4 | I think it's a very big mistake to locate it anywhere on the mainland, but particularly in such a high target area for terrorism or for an accident. And as I understand it from the GAO report, most of the accidents have been the result of human error, and so therefore would not be affected by the technology or sophistication of the building.

4| 21.4 | We just had a tornado that missed the building...one of the proposed buildings for housing this lab, by about 100 feet, and it was weakened at that point. I think an F4 or F5 tornado could unleash unimaginable havoc.

Thank you.

Comment No: 1 Issue Code: 5.0

DHS notes the commentor's views and opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species. 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: 2 Issue Code: 21.4

DHS notes the commentor's concern.

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 risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 billion in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

Comment No: 3 Issue Code: 21.4

DHS notes the commentor's concern that the NBAF would be a prime terrorist target. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a

terrorist attack. A separate Threat and Risk Assessment (TRA) (designated as For Official Use Only) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Comment No: 4 Issue Code: 21.4

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.

Richter, Linda

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PD0059

August 13, 2008

1| 25.4 | This is Professor Emeritus Linda K. Richter. I'm calling to object to the siting of NBAF
2| 5.0 | in Kansas. I don't think it should be on the mainland at all. The dangers are
considerable. Our group has organized against this, and we'll be spreading the word
3| 15.4 | throughout Kansas that this could pose a lethal danger to our - not only our wildlife, but
4| 19.4 | our agriculture, as well as our personal safety.

1 cont. | 25.4 | So, we are very much opposed to it, and think that siting it a half mile from a retirement
5| 20.4 | center and a half mile from a rec center is completely fool hearty.

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 opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 15.4

DHS notes the commentor's concern regarding the potential effects of an accidental release on wildlife in the vicinity of the Manhattan Campus 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). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 4 Issue Code: 19.4

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 NBAF EIS. The risk of an accidental release of a pathogen is extremely low.

Comment No: 5 Issue Code: 20.4

DHS notes the commentor's concern that NBAF operations could result in an accident. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. Once the Record of Decision (ROD) has been signed and prior to the initiation of NBAF operations, a site-specific emergency management plan will be developed that will be coordinated with the local emergency response agencies and will include contingency plans for potentially affected residents and institutions.

Richter, Ronald

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WD0124

From: [REDACTED]
Sent: Monday, July 28, 2008 7:48 PM
To: NBAFProgramManager
Subject: Plum Island

Dear Sir/Madam --

1 | 25.1 | I am writing to express my opinion that the DHS Plum Island facility should NOT have its level
2 | 15.3 | changed. The island's proximity to so many highly populated areas makes it a poor choice for
any higher level of research. Thank you for the opportunity to comment.

Sincerely --

Ronald Richter
[REDACTED]

The Famous, the Infamous, the Lame - in your browser. [Get the TMZ Toolbar Now!](#)

Comment No: 1 Issue Code: 25.1

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

Comment No: 2 Issue Code: 15.3

DHS notes the commentor's concern for the effects to human health and safety. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the NBAF EIS. The risk of an accidental release of a pathogen is extremely 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 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.

Richter, William

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PD0175

August 22, 2008

1) 25.4 | This is William Richter a retired faculty member and former associate provost for
 2) 5.0 | international programs at Kansas State University. I wish to register my opposition to the
 3) 21.0 | placing of the NBAF at Kansas State University and to more broadly register concern
 about placing it any place on the U.S. mainland. In accordance with the May 22nd GAO
 report, I think the evidence is clear that accidents will happen and the consequences of an
 accident in this sort of an animal environment is...would be extremely dangerous.

Thank you for giving us the opportunity to comment.

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 opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 21.0

DHS notes the commentor's concern.

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 risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 billion in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

Riggert, Roger

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WD0286

From: Roger Riggert [REDACTED]
Sent: Friday, August 15, 2008 11:56 AM
To: NBAFProgramManager
Subject: NBAF

1|24.4 | I support locating the NBAF at Kansas State University. Outstanding colleges in Veterinary Medicine, Agriculture and Human Ecology make Kansas State a perfect location for NBAF.

Roger Riggert
[REDACTED]

Comment No: 1

Issue Code: 24.4

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

Riley, Patrick

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MD0107

To: James V. Johnson ①
 From: Patrick Riley, [REDACTED]
 [REDACTED] N.C., [REDACTED]

Dear Sir; Greetings + Formalities!

Concerning the "Bio Lab" facility that
 1125.3 "the consortium" is trying to install in
 Butner, N.C., I am against it - but only
 in principle. It's difficult to form a more
 212.0 realistic opinion on an issue that is
 secret! The secrecy of the operations of
 such a facility is a license for mischief,
 corruptions of various sorts, ineptitude, and
 stupidity. Logistically - there is not a
 guarantee of "feed-back" in operations
 and from the Democratic process to keep
 such a facility operating safely and securely!
 My experience with the Federal Government
 is that too often its representatives tell
 "We the People" the lies that the people want
 to believe.

Although I believe in the goodness of people,
 when a bureaucracy is assembled - good people
 in such employment are hostages and must obey
 any edict (right or wrong) without question,

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: 2.0

DHS notes the commentor's lack of confidence in the DHS. DHS has made every effort to explain the operational aspects of NBAF and has conducted a thorough and open public outreach program in support of the NBAF EIS that exceeded NEPA requirements. 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.). There would no classified research at the NBAF, however there may occasionally be classified FBI forensics cases. Currently, the PIADC facility publishes research in publicly available research journals; NBAF would publish its research in publicly available research journals as well.

Riley, Patrick

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MD0107

lest their retirement pension is put in peril.⁽²⁾
Several years ago, I spent about 80 hours doing a cross-referenced study of "Protestant Reformation", using my 1963 set of Encyclopaedia Britannica, and although I found the roots of Bureaucracy vs. the people's humanitarian reform movement, as far back in history as 1200 A.D. in France - I believe the more modern events on the N. American Continent are sufficient to support my stance against the secret Bio-Lab "in principle".

The Puritans (right wing Calvinists) that went on to form the Federal Government came here to establish a slave colony using the native population as slaves. (I regress) - they had started 2 civil wars in England, and the 30 years war in Europe, before being exiled to Holland - then coming here. When I heard George Bush Jr. say, after the 9-11-01 attacks "if you're not for us, you're against us" I thought "that's Calvinism", and that's what piqued my curiosity to read history.

The Puritans [were not Pilgrims] murdered

Riley, Patrick

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MD0107 (3)
as many other secular and religious peoples
as they could as an advertisement of their
territoriality - so as to be left alone
from the work of "left-wing" reformers. When
England declared religious tolerance in all
British colonies, the Puritans fled to
Connecticut. If they had not started the
Revolutionary War - they would have been
hung by the neck for all their crimes
against humanity. Sam Adams (cousin to
John Adams) got some drunken colonists to
pick a fight with a group of British troops,
and five colonists were killed. Adams
(Sam) & nebr do well, parlayed this event
into THE BOSTON MASSACRE, while in
fact, the Puritans had killed many
thousands directly and millions indirectly.
When Puritans (not Pilgrims) come into
Political Power - war is not far away.
This group became the National Republican
Party and in 1819 "The Pilgrim Society"
was formed expressly to cleanse THE STENCH
of Puritanism from the Republicans! And
of course they staged a nice story about

Riley, Patrick

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MD0107 (4)
the formation of the Pilgrim Society and the ~~invention~~ assignment of the terms "Pilgrim" and "Founding Fathers". The Republican Party has come to believe their own lies and forgotten their own history. The unmitigated EVIL (live spelled backwards) of the Puritans acted as catalyst for the civil war (which was a "land grab" and political over throw), and WWI and WWII. I expect there is a "cover" of Republican Puritanism connected w/ the Harvard Business School. During the I.T. crash of the late 1990's the Harvard Endowment increased from 2 Billion to 6 Billion - while the common citizens were losing their pensions! The Republicans (after several attempts) found cohesion bonding the Whigs (means horse thief) and the Anti-Masons, which is simply a most bizzyare episode in American History. Abe Lincoln (a former Whig), being labeled as Honest Abe was probably a thief and certainly an idiot with a cabinet of thieves, and

Riley, Patrick

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set the pattern for the National Republican Party - to this date, August, 2008²⁸.

"Trust us", doesn't do it for me, after the first Space Shuttle disaster, when space teacher Crista Mc Colluch died doing a public relations stunt (she had no business there), Ronald Reagan (Hinckley killed the real Ronald Reagan and an actor was put in his place), decided that National pride should be boosted so the "Super Collider" effort tried to take my land and pollute my water. Touted as a NO NEUTRON machine, it would have made "secondary neutrons" if sited in granite bed-rock. I've witnessed several other fiascos. A local farmer can slowly kill me w/ spray products and there is no-one locally, state wide, + nationally that will protect me. ~~OSHA~~ OSHA will not receive my complaints because I'm not in the employ of the offending farmer. Why ^{SHOULD} I trust anything of The Federal Government.

Riley, Patrick

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MD0107

⑥

3118.0

Remember "The Crime of '87" (1887),
 I've been told that refuse from the
 "bio-lab" would be steam sterilized,
 but it changed to chemical sterilization
 because steam sterilization is too
 expensive. THAT'S HOW MAD COW
 DISEASE ESCAPED to North
 America from Great ~~Britain~~ Britain and
 also how Hospitals spread it among patients
 using neurosurgery electrodes that could
 not ^{BE} steam sterilized without being damaged.
 As far as I know, "Homeland Security"
 will be staffed ^{WITH} pre-psychotic paranooids
 and Oliver North clones.
 I could write you a book, but the few
 examples listed must suffice. I can
 principle I love America. I cannot trust
 bureaucracies or National Republicans or
 anyone in the Senate! Government is
 not for the people, it is for Government.
 According to Encyclopedia Britannica
 the term "fiction" is a legal term

Comment No: 3

Issue Code: 18.0

DHS notes the commentor's concerns about waste management and sterilization. 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 waste 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. All of these technologies produce sterile or noninfectious residuals.

Riley, Patrick

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for something claimed to be true - ⁽²⁾that is not true. One example of a fiction it lists is "that the representatives of a representative government actually represent the people" !

~~When~~ When the Republican Army took Atlanta, Ga. during the Civil War, 6 million bales of cotton were made to disappear! I figured it once - that would be a stack 1/4 mile square and 200 feet high. Where do ^{you} think it went?

The Constitution was broken in \approx 1830 when eminent domain was given to the railroad companies. The opposition was staunch here in N.C. By coincidence that was when the Capitol building was set afire and destroyed. There was a mass movement of Baptists into the Louisiana territories. They recognized the "Bigno", for they historically got their "butts kicked" first + worst.

When oil was discovered in Texas,

Riley, Patrick

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(8)

~~that~~ there was a mass movement from Massachusetts to Texas. Funny how many "Texans" have degrees from Harvard and Princeton! Gasoline sells at \$4 a gallon, when accross the border at San Diego into ~~the~~ Mexico it sells for \$1.50 a gallon! Bad as it sounds, the last ^{time} gas locally sold for under one dollar a gallon was the Thanksgiving after 9-11-01, when people were afraid to travel.

After 9-11, I called the local National Guard and purchased a copy of the latest Merck Index (so I could identify chemical hazards).

I love America, I love the land, I love North Carolina. But bureaucracies are miniature totalitarian governments, and these are not worthy of trust! If anyone says I'm not patriotic, I say Oliver North - a true patriot of unpatriotism. I hear that the homeless are building communities under bridges in N. Virginia. The land of the free and the home of the brave!
 Thank you for your time & effort. Sincerely,
 Patrick Riley (OVER)

Riley, Patrick

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PS: a copy of this letter will be sent
to local opposition groups and to
the county managers office.

+ thanks
P.R.

Riley, Ron

Page 1 of 1

WD0747

From: Pascale Riley [REDACTED]
Sent: Monday, August 25, 2008 2:41 PM
To: NBAFProgramManager
Subject: NBAF Athens Pros and Cons

To whom it may concern;

I have several concerns about siting the NBAF in Athens.

- 1|15.2 | First, the location at the edge of the county will probably not improve the economic situation in Athens because most of the people who are hired for the well paying positions will live in Oconee county.
- 2|12.2; | Second, the facility will drain Athen's resource's (water, air quality, security) and utilize Athens
 3|9.2; | infrastructure (Fire, police, etc) while adding little or nothing to the Athens tax base.
 4|8.2
- 5|6.2 | Third, the location next to the State Botanical Gardens could undermine future expansion of the garden, especially the wilderness areas which are heavily used by the Athens community.
- Fourth, it is hard to imagine how the University can meet the needs of the facility without redirecting the resources of the University which are currently under serious restrictions.
- 6|1.0 | Lastly, I am not convinced that the terrorist threat to agriculture is sufficiently reality-based to deserve a dedicated research facility. Why not use the money to support a competitive research program that is transparent and requires rigorous public oversight and peer review?

Sincerely,

Ron Riley

[REDACTED] GA [REDACTED]
 [REDACTED]

Comment No: 1 Issue Code: 15.2

DHS notes the commentor's concern. The economic effects of the NBAF at the South Milledge Avenue Site are included in Section 3.10.3 of the NBAF EIS. Labor income during construction is projected at approximately \$150 million while operation of the NBAF would generate approximately \$28 million in wages annually.

Comment No: 2 Issue Code: 12.2

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

Comment No: 3 Issue Code: 9.2

DHS notes the commentor's observations regarding the assessment of the Athens area air quality and potential impacts from NBAF operations. Section 3.4.1 of the NBAF EIS describes the methodology used in assessing potential air quality consequences. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3. Should a decision be made to build NBAF and following site selection and final design, a complete emission inventory would be developed and refined modeling performed as necessary in accordance with state-specific air quality permitting requirements and specifically to show compliance with the National Ambient Air Quality Standards (NAAQS) and the Georgia State Implementation Plan (SIP), if applicable.

Comment No: 4 Issue Code: 8.2

DHS notes the commentor's concern regarding the adequacy of the utility infrastructure to support the NBAF operation at the South Milledge Avenue Site Alternative. Section 3.3.3 of the NBAF EIS includes an assessment of the current infrastructure, a discussion of the potential effects from construction and operation of the NBAF, and the identification of any infrastructure improvements necessary to meet design criteria and insure safe operation. Should a site be selected for NBAF, any needed infrastructure improvements to ensure service reliability would be identified in accordance with the final facility design.

DHS notes the commentor's concern for security of the NBAF. Regardless of location, the NBAF would have the levels of protection and control required by applicable DHS security directives. A Threat and Risk Assessment (designated as For Official Use Only) was prepared that evaluated site-specific security issues and will be considered in the decision making process on whether or not the NBAF is built, and, if so, where.

Comment No: 5 Issue Code: 6.2

DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1, 80% of the site consists of

pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. It is unknown whether or not the use of the South Milledge Avenue Site for the NBAF would affect the future expansion of the State Botanical Gardens.

Comment No: 6 Issue Code: 1.0

DHS notes the commenter's statement. The purpose and need for the proposed action is discussed in Chapter 1 of the NBAF EIS. 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.

Rivers, Reita

Page 1 of 1

WD0605

From: [REDACTED]
 Sent: Saturday, August 23, 2008 5:12 PM
 To: NBAFProgramManager
 Subject: SUSPECT:

1|25.2; 2|13.2; 3|12.2 | Sir: I strongly oppose the building of the proposed National Bio and Agro-Defense Facility in Athens, Georgia, for many reasons! Four years of construction?? A longtime friend and supporter of the State Botanical Garden of Georgia, I almost come to tears just thinking about walking along garden trails by the Oconee River and seeing the runoff pollution resulting from construction...or having a wedding or musical event in the lovely chapel there interrupted by the sound of dynamite breaking up the bedrock near by. Can the Botanical Garden and all it offers to attract 200,000 visitors a year survive even the construction phase...which, if the CDC addition in Atlanta is an example, could take longer than the specified time of four (4) years? I doubt it.

1Cont.|25.2 | I oppose building this facility in Athens because of numerous safety concerns, not only those stemming from the research to be conducted there, but because it also increases the risk of a terrorist attack in this community. The recent news

4|21.2 | of the young Pakistani woman who had attended M.I.T. and was arrested in Afghanistan and exposed as a terrorist who had in her possession maps of Plum Island makes one wonder who will be responsible for thoroughly checking the backgrounds of all foreign students who come here to study vet medicine or agriculture...would it be UGA or Homeland Security??

3Cont.|12.2 | I oppose this facility because of the demands it will make on our water supply. This drought has made demands on Athens citizens to conserve water in many ways. In such conditions, would NBAF be asked to do the same...and would it even be possible for the operation to "conserve" and continue "safe" operation??

5|6.2 | I oppose the lab because the building, itself, would destroy one of the most beautiful landscapes in the Athens area...and the high-intensity lighting at night would mean the loss of whatever birds and wildlife might have managed to survive the construction phase.

1Cont.|25.2 | I hope with all my heart that Homeland Security will not choose Athens as the site for NBAF. I also hope that this contemplative exercise will prompt more citizen involvement in planning for the future development of both Athens town and the first state-chartered university in the nation, The University of Georgia.

Sincerely yours,
 Reita Rivers
 [REDACTED]

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 13.2

DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 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.

Comment No: 3 Issue Code: 12.2

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

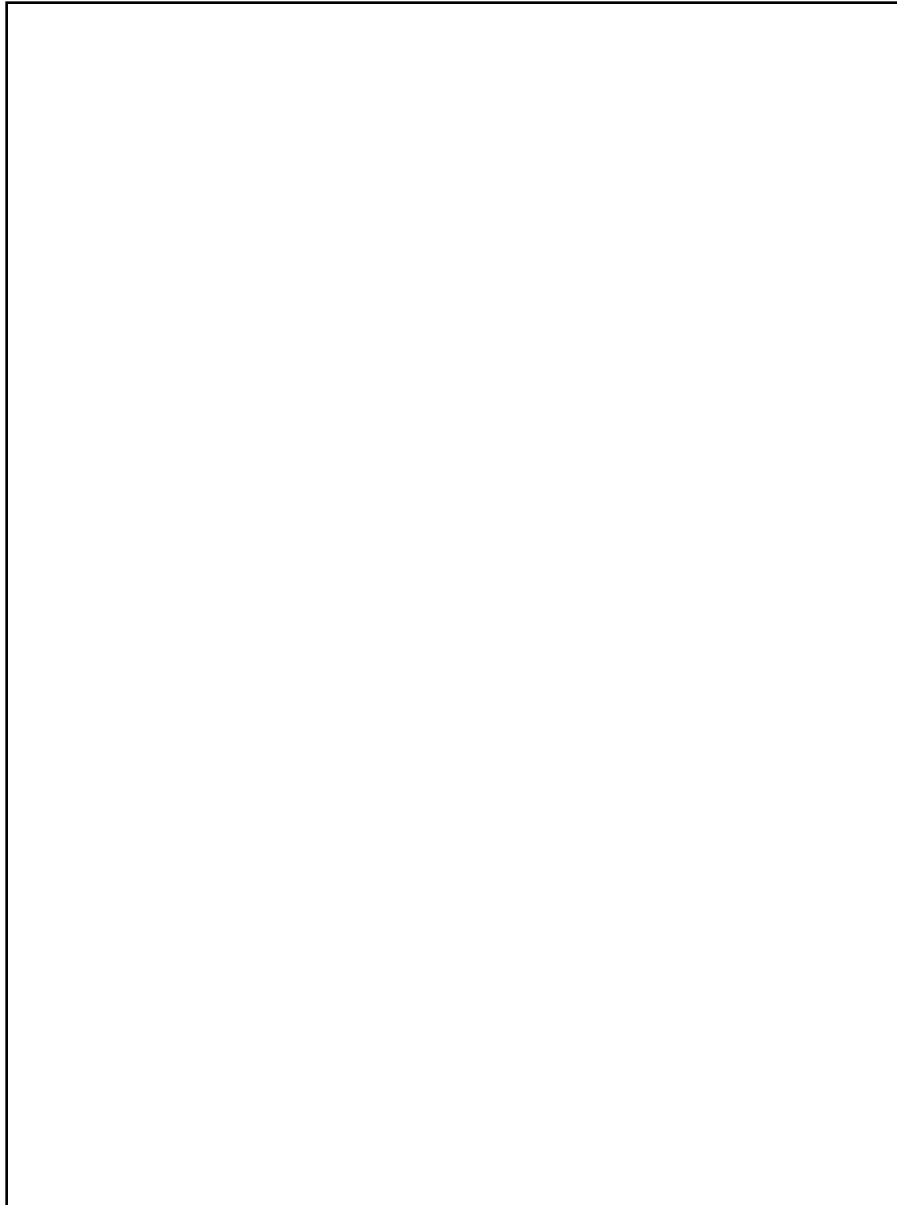
Comment No: 4 Issue Code: 21.2

DHS notes the commentor's concern. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety. 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.

DHS notes the commentor's concern that the NBAF would be a terrorist target. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Comment No: 5 Issue Code: 6.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in 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. Nighttime lighting could be mitigated with the use of shielded lighting and/or shielded fixtures that direct light downwards and can be used to keep light within the boundaries of the site and use of the minimum intensity of lighting that is necessary to provide adequate security.

Roberts, Kesler

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WD0581

From: Kesler Roberts [REDACTED]
Sent: Sunday, August 24, 2008 1:35 PM
To: NBAFProgramManager
Subject: Opposed to NBAF in Athens, GA

1|25.2 | My family is opposed to siting the NBAF in [REDACTED] Athens, Georgia. The benefits to the community clearly do not outweigh the direct impact of this facility and the risks that accompany it. Please do not site the NBAF here.

Kesler Roberts

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

Robinson, Gwendolyn

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FD0077

August 21, 2008

The Honorable Jay Cohen
Undersecretary for Science and Technology, and
Selection Authority, National Bio and Agro-Defense Facility
Department of Homeland Security
245 Murray Lane SW, Bldg 410
Washington, DC 20528

Dear Admiral Cohen,

The Alamo City Black Chamber of Commerce would like to express its support for the efforts of the Texas Biological and Agro-Defense Consortium in its efforts to locate the National Bio and Agro-Defense Facility to San Antonio,

124.6

San Antonians have seen the biomedical research sector emerge as the largest sector of our economy. Now, in addition to promoting the city's wonderful tourism industry, local residents are glad to point out that San Antonio also boasts a bustling medical center, world-class research institutions and cadre of great scientific minds and achievements that form the nucleus of a thriving intellectual community.

Our community is well known for its broad-based efforts to bring new and exciting additions to its business and scientific constituency and will galvanize to see that the National Bio and Agro-Defense Facility ultimately re-locates here.

The Alamo City Black Chamber of Commerce and its members, representing numerous small and large businesses, offers its support to the Texas Biological and Agro-Defense Consortium as it works to secure the National Bio and Agro-Defense Facility for the Alamo City.

Sincerely,



Gwendolyn P. Robinson
Executive Director

Comment No: 1

Issue Code: 24.6

DHS notes the commentor's support for the Texas Research Park Site Alternative.

Robinson, Janice

Page 1 of 1

PD0015

July 10, 2008

Yes, hello,

1|25.1 My name is Janice Robinson. I live in [REDACTED] and I'm vehemently opposed to the bio lab for...I can't imagine why they would be considering Orient Point...you know an island right off Orient Point, for this particular facility, when the facility they have right now is totally objectionable to most of us.

Okay, my P.O. Box is [REDACTED].

Comment No: 1

Issue Code: 25.1

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

Robinson, Roma

Page 1 of 1

WD0083

From: [REDACTED]
 Sent: Thursday, July 17, 2008 3:07 PM
 To: NBAFProgramManager
 Subject: Opposed to Manhattan, Kansas location

1| 21.4 | It is my understanding from reading the material available so far that should a breach in security at this facility occur there would be a 6 mile radius quarantine around the facility. This quarantine would mean that those inside that radius would be confined until such time as the safety of the facility was reestablished. A 6 mile quarantine at the location proposed at Kansas State University would not only affect the entire campus but also the community's only hospital, one nursing home and numerous multiunit apartment complexes located near the university. In addition it would encompass all of the animal research facilities, a very large grain milling facility on campus and many businesses.

2| 25.4 | It seems to me that locating this facility in any very populated area, near many thousands of head of livestock is not a wise decision and I am vehemently opposed to it being located in Manhattan, Kansas!!!

3| 24.1 | Please consider leaving the facility on Plum Island where it is isolated and where moving the laboratories contents would be quite contained and simplified by the proximity of the new facility to the old.

Thank you,
 Roma Robinson

Comment No: 1 Issue Code: 21.4

DHS notes the commentor's concern. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use only) (TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential %high-consequence biological pathogens%, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Manhattan Campus Site, then site-specific protocols would be developed in coordination with local emergency response agencies. 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. The type, duration, and geographical extent of a potential quarantine would be determined by the authorities depending on the pathogen released and the contamination level.

Comment No: 2 Issue Code: 25.4

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

Comment No: 3 Issue Code: 24.1

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on risks to residents and livestock. 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 in populated areas such as Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

Rodriguez, Sylvie

Page 1 of 2

WD0457

From: Sylvie Rodriguez [srodriguez@siceltech.com]
Sent: Friday, August 22, 2008 3:13 PM
To: NBAFProgramManager
Subject: NC Resident Opposed to NBAF

To whom it may concern;

- 1| 25.3 | I am writing to express my grave concern regarding the proposed NBAF site in Butner NC.
 2| 12.3 | The location is right at the Falls Lake watershed and is Raleigh's (our state capital) ONLY water supply. Wear, tear and corrosion will have us all cancer ridden, if not disease ridden, within a decade!
 3| 19.3 | The area of Butner is small (maybe one or two thousand people) and leaving it responsible for treating waste water from this facility, responding to any accidents at this facility, or a truck transporting dangerous goods to/from the facility AND also moving 7000+ institutionalized people (prisoners, crazies, juvenile delinquents, etc.) out of harm's way should a fire, accident, etc. on the shoulders of the small town boys is a completely irresponsible, senseless and heartless thing to do. DHS has made no provision whatsoever for the local area people to be moved in the event of a fire, viral contamination, etc, nor have I heard of any onsite professionals or training provided to local responders. But who cares about a couple of thousand people out in the country, right? WRONG!!!!
 4| 5.3 | This proposed site would be replacement for Plum Island in NY, which is could be easily and more cost effectively updated leaving our sweet country intact. Why not leave the mess there?
 1 cont.| 25.3 | Please don't bring the mess & stress here. We like NC the way it is....with a little bit of fresh air and water left!!!
 4 cont.| 5.3 | If people are a concern at all, wouldn't a facility of that sort be better suited in a remote valley of some unoccupied mountain somewhere or are only folks from NY important?

Sincerely concerned, disgusted and scared,

Sylvie J. Rodriguez
 Facilities & HR Administrator
 Sicel Technologies, Inc.
 3800 Gateway Centre Blvd, Ste 308
 Morrisville, NC 27560-6221
 (919) 465-2236 ext.232
 (919) 465-0153 Fax
www.dvssmartmarker.com

Comment No: 1 Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative based on environmental concerns. The NBAF would be designed and constructed using modern biocontainment technologies, and operated by trained staff and security personnel to ensure the maximum level of worker and public safety and least risk to the environment in accordance with all applicable federal, state, and local laws and regulations.

Comment No: 2 Issue Code: 12.3

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

Comment No: 3 Issue Code: 19.3

DHS notes the commentor's concern. 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.

Comment No: 4 Issue Code: 5.3

DHS notes the commentor's statement. 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. 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 suburban 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.

Rodriguez, Sylvie

Page 2 of 2

WD0457

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Rogers, Robert and Nancy

Page 1 of 1

NCD010

Dear Consortium:

We, as 47 year citizens of [redacted], NC do strongly oppose the siting of NB10-AGRO Defense Facility here - Reasons: air quality, water quality, life in general of citizens including eight State Facilities, i.e. - Mendenhall Center, John Amstrad Hospital, Federal Prison, etc - For many reasons, we oppose this facility - Thank you for your help in keeping this out!

Nancy + Robert Rogers
[redacted]

THANK YOU FOR YOUR COMMENTS

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

<p>U.S. MAIL</p> <p>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</p>	<p>TOLL-FREE FAX</p> <p>1-866-508-NBAF (6223)</p>
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Comment No: 1 Issue Code: 25.3

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

Rogers, Wes

Page 1 of 1

WD0572

From: Wes Rogers [REDACTED]
Sent: Sunday, August 24, 2008 3:51 PM
To: NBAFProgramManager
Subject: Yes

1|24.2 I have been quiet throughout this process, but I think it's important for the "silent majority" in Athens to speak up. There are a few outspoken individuals opposed to the NBAF facility in Athens, but they do not represent the opinions of most people in this community. I can speak for myself and my family that has lived in [REDACTED] for generations in saying that we support the proposed NBAF facility in Athens. Not only would this be an asset to our community, but I also feel that Athens is the ideal location for this facility. Please do not let the extreme comments from a few outspoken individuals negatively influence your decision to locate the NBAF facility in Athens, GA.

Thank you for your consideration,

Wes Rogers
[REDACTED]

Comment No: 1

Issue Code: 24.2

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

Romada, Keith and Patricia

Page 1 of 1

WD0527

From: [REDACTED]
 Sent: Sunday, August 24, 2008 9:05 PM
 To: NBAFProgramManager
 Subject: NBAF Comments

Dear Sir,

1) 25.3 We live near Butner, North Carolina where the NBAF facility is proposed to be built. We do not want this facility
 2) 5.0 built near us or believe any such site should be built on the mainland. If any of these diseases escape, they will ruin
 3) 21.3 agriculture in North Carolina and possibly the United States. Not to mention there are no emergency evacuation
 4) 19.3 plans in place to remove the prisoners from the Federal Prison, the 7,000 disabled people housed in the Butner
 facilities, as well as local residents.

5) 15.3 This will not benefit any citizen of North Carolina except for the politicians. This will cause property values to
 decrease across the Raleigh/Durham region as well as a large exodus of people and farms in the area. Reconsider
 your support for the NBAF for the sake of the citizens of North Carolina and the USA.

Thank you for taking the time to read our comments.

Sincerely,

Keith and Patricia Romada
 [REDACTED]

P.S. We will be closely monitoring your position on the NBAF. We will make it public knowledge when it comes
 time for your re-election.

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: 5.0

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

Comment No: 3 Issue Code: 21.3

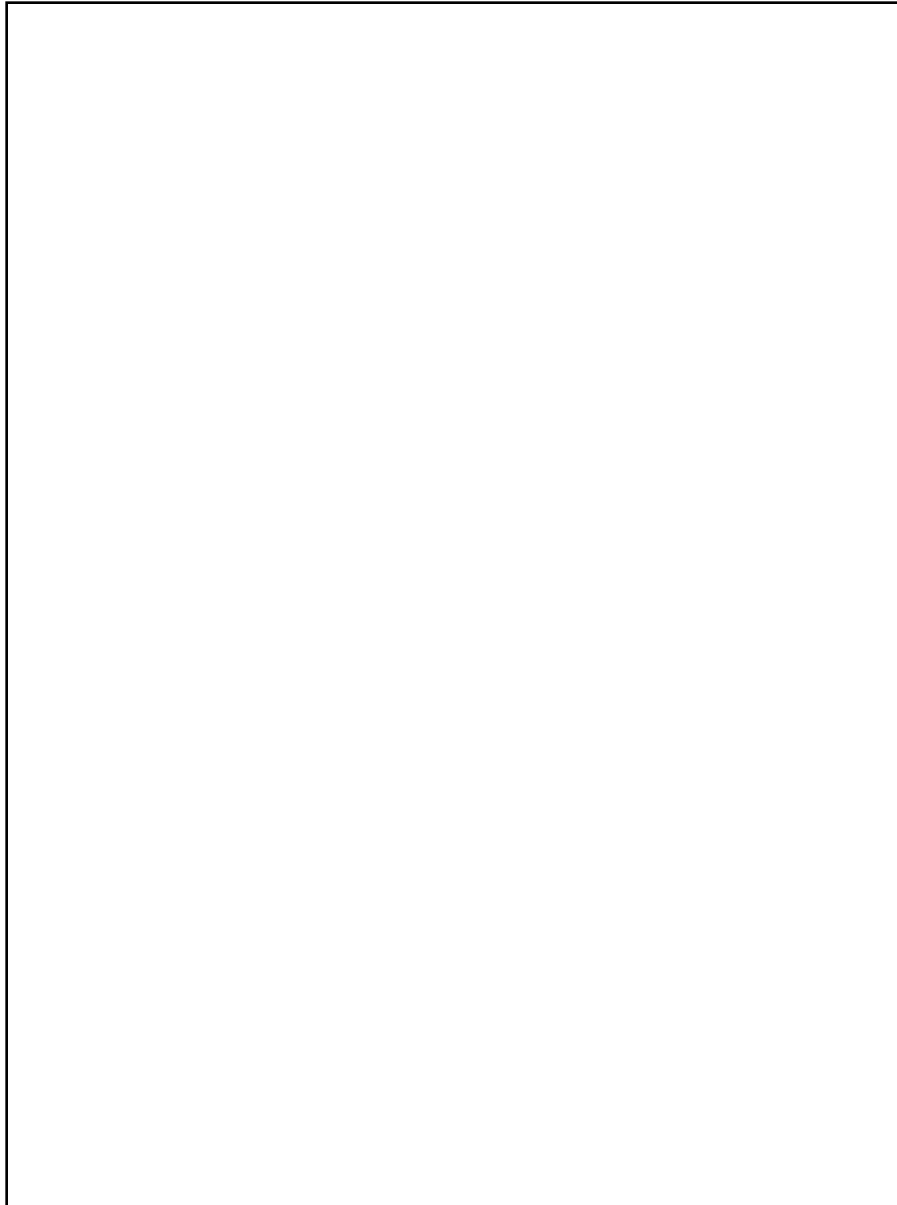
DHS notes the commentor's statement.

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 risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 billion in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

Comment No: 4 Issue Code: 19.3

DHS notes the commentor's concerns regarding the impact of an accident and subsequent potential evacuation on the local residents, including the institutionalized population. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. %Appendix B to the NBAF EIS describes biocontainment lapses and laboratory acquired infections in the United States and world-wide. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Umstead Research Farm Site then site-specific protocols would be



developed, in coordination with local emergency response agencies that would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation in response to an accident 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: 15.3

DHS notes the commentor's viewpoint. The socioeconomic effects of the NBAF at the Umstead Research Farm Site are included in Section 3.10.7 of the NBAF EIS. Construction, operation and maintenance of the facility will generate short-term and permanent jobs, a portion of which will be filled by the local labor force. There is no empirical evidence that a facility such as NBAF would lead to a large exodus of people or farms or that it 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 would increase due to an increase in demand.

Romig, MG USA, retired, Thomas**Page 1 of 2**

WD0411

From: Thomas Romig [REDACTED]
Sent: Wednesday, August 20, 2008 1:32 PM
To: NBAFProgramManager
Cc: [REDACTED]
Subject: NBAF: For Admiral Cohen

Dear Admiral Cohen,

1|24.4 | I am writing in support of Kansas State University (KSU) in Manhattan, Kansas, as the new home for the National Bio and Agro-Defense Facility (NBAF). I am currently the Dean of [REDACTED] Kansas. Prior to becoming the Dean at [REDACTED] I served as the Deputy Chief Counsel for Operations and the Acting Chief Counsel of the [REDACTED] Prior to that, I served 34 years in the U.S. Army, retiring as a The Judge Advocate General of the Army.

In 2007, Governor Kathleen Sebelius appointed me to the Kansas NBAF Task Force. I am sure that my background in the Army and the federal government, plus my legal expertise, were factors in her selection. Since my selection, I have had the opportunity to analyze and evaluate the proposed KSU site in light of the opportunities and benefits it will provide for our national defense. I have toured the biocontainment facility in KSU's Biosecurity Research Institute and was extremely impressed with this existing facility. KSU has a very long history of researching and treating animal pathogens. It has leveraged this capability by establishing partnerships with numerous private animal health companies in what has come to be known as the Kansas City Animal Health Corridor, employing 13,000 animal health specialists in more than 120 companies. I have had the opportunity to tour some of these facilities and was amazed at what is being done here in Kansas to further animal bio research.

Another aspect of the KSU location of which I am very familiar is the nearby location of military installations. Fort Riley, home to one of the nation's premier Infantry Divisions and a major Army helicopter unit, is less than 20 miles to the west. Forbes Field, a major heavy lift airfield and home to a U.S. Air Force Reserve refueling unit, is in Topeka, 45 minutes east of KSU by ground transportation, but merely a handful of minutes by military helicopter. Schilling Field, another major airfield, is about an hour west of KSU, but also a short travel time by helicopter. Fort Leavenworth, the Army's think tank for strategic concepts and the school for future senior leaders of the Army, is an hour and half east of KSU. The reason I mention all of this is because as a former military man, I look at the strategic location of any proposed defense facility. How can it be defended? What are the emergency reaction force capabilities existent to support the facility? How can support or resources be moved in and out quickly? What are the military opportunities that exist for this national defense resource known as NBAF? These factors should not be ignored in making a site decision. I doubt if any facility

Comment No: 1Issue Code: 24.4

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

Romig, MG USA, retired, Thomas

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WD0411

under consideration can come close to the strategic location of KSU.

On April 10, 2002, you testified before the Emerging Threats and Capabilities Subcommittee on Combating Terrorism and Weapons of Mass Destruction, Senate Armed Services Committee. In that testimony, you stated:

"[S]ince the end of WWII, Service laboratories, **along with the private sector counterparts** have played a crucial role in providing our military the technological superiority needed to counter potential adversaries. **The role is even more critical in the post-9/11 world**, where a wide range of new technologies are needed to fight terrorism, protect the homeland, and enable defense transformation efforts."

You further discussed the difficulty of recruiting and retaining top-quality scientists and engineers at laboratories and promised a set of recommendations to attract and retain the best and brightest technical talent. I would submit to you that the KSU location already has a strong and growing cadre of the best and brightest scientists and engineers. In a 70-mile radius around KSU there are four major universities, and the state of Kansas as a whole has a total 69 institutions of higher learning. One of biggest resources of Kansas is educated people. When coupled with the enormous private sector partnerships, this provides an overwhelming argument for the KSU location.

This strategic superiority of the KSU location, its flourishing capabilities in animal bio research, and the abundant educated human capital in the area should make KSU the obvious choice. I would hope that a decision as important as this is to our nation would not be tainted by political considerations. This is too important a decision with a such a long- term and lasting impact on our country to do any less than select the very best location based on the facts.

Very respectfully yours,

Thomas J. Romig, MG USA, retired

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