

Stone, Sam

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WD0800

From: mlascon@dfamilk.com on behalf of sstone@dfamilk.com
Sent: Monday, August 25, 2008 5:04 PM
To: NBAFProgramManager
Subject: Plum Island Comments
Importance: High
Attachments: Plum Island Comments.pdf

If you have any questions or need additional information please feel free to contact me.

Sam Stone

(See attached file: Plum Island Comments.pdf)

Sam Stone
Vice President Government Relations
Dairy Farmers of America, Inc.
Phone: 816-801-6474
Fax: 816-801-6475
E-mail: sstone@dfamilk.com

Stone, Sam

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 **WD0800**

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 20582

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

Mr. Johnson:

Dairy Farmers of America, Inc. (DFA) takes this opportunity to express our agreement with the comments submitted by National Milk Producers Federation (NMPF) regarding 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 the U.S. mainland.

1|5.1 | DFA in strong support of NMPF also prefers to maintain an upgraded or new Plum Island research facility as the new NBAF site.

2|5.2 | After reviewing your comparison chart for the "Potential Adverse Effects for Normal Operations" for the six sites that you considered for the National Bio and Agro-Defense Facility (NBAF), we are confused as to why you would propose to relocate the NBAF facility to an inland location. The results of 10 of the 15 criteria you considered for the six sites were identical. Of the remaining 5 criteria, Plum Island results are 2-negligibles, 2-minor and one moderate score. The Plum Island location is the only site of the 6 that has a "cumulative effects" score of "negligible".

3|5.1 | In the criteria of Health and Safety you rank Plum Island higher than the 5 other sites. In your impact statement you indicated that "For all sites except the Plum Island Site, the overall risk rank was moderate due to the potential easy spread of a disease through livestock or wildlife. The risk rank for the Plum Island Site was low or none due to the low likelihood of any disease getting off of the island".

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,


Sam Stone
Vice President Government Relations

10220 North Ambassador Drive, Kansas City, MO 64153 | www.dfamilk.com

Comment No: 1 Issue Code: 5.1

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

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's 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. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 3 Issue Code: 5.1

DHS notes the commentor's statement.

Stoughton, Alley

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WD0170

From: Alley Stoughton [REDACTED]
Sent: Monday, August 04, 2008 10:32 AM
To: NBAFProgramManager
Subject: proposed siting of NBAF in Manhattan, KS

1| 25.4 | As a [REDACTED] KS, resident, and a faculty member of Kansas State
 University, I want to indicate my strong opposition to siting the NBAF
 in Manhattan. Past experience shows that human errors in handling
 biological material will occur, no matter how careful the procedures
 2| 21.4 | for handling them are. Accidents like the release of the foot and
 mouth pathogen on Plum Island were containable. But in Manhattan, at
 3| 15.4 | the heart of the Nation's livestock industry, such containment would
 be far too expensive. Furthermore, although Manhattan is not a large
 4| 15.4 | community, it seems callous in the extreme for local leaders to trade
 half a billion dollars in funding for putting all of us at risk. I'm
 perplexed at why it is taking local residents so long to mount the
 kind of organized opposition to NBAF that exists elsewhere. But there
 are signs of increasing organization, and at least our local newspaper
 is now alerting readers to the impending danger.

Regards,

Alley Stoughton

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

Comment No: 3 Issue Code: 15.4

DHS notes the commentor's concern. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible economic effect would be significant for all sites. Section 3.10.9 of the NBAF EIS presents estimates of the possible economic effect of an accidental release.

Comment No: 4 Issue Code: 15.4

DHS notes the commentor's concern. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. As noted in Section 3.10.9 and Appendix D, the major economic effect from an accidental release of a pathogen would be a ban on all U.S. livestock products until the country was determined to be disease-free. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

Strange, Aralee

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WD0354

From: Aralee Strange [REDACTED]
Sent: Tuesday, August 19, 2008 10:45 AM
To: NBAFProgramManager
Subject: NBAF in Athens

1|25.2 | I am a resident of [REDACTED] with a mule and a horse in my care, and I
 DO NOT want NBAF here. Not only is the designated site totally
 2|12.2 | inappropriate for such a facility, but we are in the middle of a very
 SERIOUS drought, with no relief in site. I still do not understand
 3|5.1 | why the Plum Island site can't be renovated in order to keep such a
 facility off the mainland.

1 cont. | So please put in the record that we DO NOT WANT YOU HERE.
 25.2

Aralee Strange

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 12.2

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

Comment No: 3 Issue Code: 5.1

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. However, construction of a new facility on Plum Island is included as one of the alternatives.

Strathman, Robert

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WD0455

From: Robert Strathman [REDACTED]
Sent: Friday, August 22, 2008 3:16 PM
To: NBAFProgramManager
Subject: Support of NBAF
Importance: High

To whom it may concern:

I support locating the NBAF facility in Kansas.

Rob Strathman

Life long Kansas resident

Comment No: 1

Issue Code: 24.4

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

1| 24.4

Strauss, Crystal

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WD0837

From: Crystal Strauss [REDACTED]
Sent: Monday, August 25, 2008 7:08 PM
To: NBAFProgramManager
Subject: Against Bio Facility - Manhattan, KS

1| 5.4 | I don't want the National Bio & Agro Defense Facility built in Manhattan, KS. Even a small risk
 2| 19.4 | is too much of a risk here in the middle of agriculture country and the amount of people is could
 3| 5.1 | affect is too many. You should build it on the island to protect any outbreak from happening and
 spreading to any person, animal, etc, etc. It's just too dangerous!!!

Thank you!

Comment No: 1 Issue Code: 5.4

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

Comment No: 2 Issue Code: 19.4

DHS notes the commentor's concern. The risk of an accidental release of a pathogen is extremely low. 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 of \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to foreign bans on U.S. livestock products. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Manhattan Campus Site, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area, to include agricultural livestock. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. Emergency response plans will include the current USDA emergency response plan for foot and mouth disease (FMD) which includes compensation for livestock losses. Risks to human populations at each alternative site were evaluated and discussed in Section 3.14 and Appendix E of the NBAF EIS. FMD is not a public health threat; humans as well as cats, dogs, birds and other non-cloven hoofed household pets are not affected by FMD.

Comment No: 3 Issue Code: 5.1

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

Strauss, Julie

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WD0824

From: Julie Strauss [REDACTED]
Sent: Monday, August 25, 2008 6:14 PM
To: NBAFProgramManager
Subject: comments

To Whom It May Concern ~

1| 5.4 I am deeply opposed to the building of the National Bio and Agro-Defense Facility on the
 campus of K-State in Manhattan, KS. It is right in the heart of Agriculture and Livestock
 Growing culture of Kansas. And even if it were to be built any place in Kansas I would oppose it
 as it is still mainly an agricultural state. Even a small risk is too much of a risk here, as I think
 any place on the mainland would be. The number of livestock and people that could potentially
 2| 19.0 be harmed is too large of a risk. I would believe that building a new building on the island that
 3| 5.1 the older facility is already on. This is more protection than any other place on the mainland
 could be. Even other countries see the potential risks involved of building their facilities on their
 mainland's and are building them on islands also.

Sincerely,

Julie Strauss

Comment No: 1 Issue Code: 5.4

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

Comment No: 2 Issue Code: 19.0

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 the NBAF.

Comment No: 3 Issue Code: 5.1

DHS notes the commentor's 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.

Strauss, Steve

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WD0833

From: Steve & Julie Strauss [REDACTED]
Sent: Monday, August 25, 2008 6:50 PM
To: NBAFProgramManager
Subject: nbafe not in kansas

I am writing to voice my opinion of the nbafe proposed sight in Kansas.

1| 25.4 | I can not think of a place that is NOT suited to this site more than Kansas .

A facility of this scope even with the finite chance of problems put in the hub of the country, in the center of the nation's prime grassland abundant with cattle , other livestock, and wildlife.

2| 21.4 | In the event of problems the whole nation would be affected in all directions.

Having so many pertinent installations so close together doesn't seem like a good idea, a major university and with a large military base in close proximity it would make it easier for terrorist activities or warring factions to do damage to all of them in one easy swoop

3| 5.1 | Even your own people have stated that the safest place is where it is now.

Please keep the research facility on Plum Island where it belongs. On one end of the country where in the event of a problem it would be easier to control not in the center where problems can spread all directions.

thank you

Steve Strauss

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern 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: 3 Issue Code: 5.1

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

Strawn, Bob

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WD0189

From: Bob Strawn [bob.strawn@gat.com]
Sent: Tuesday, August 05, 2008 4:30 PM
To: NBAFProgramManager
Subject: NBAF site - see attached
Attachments: NBAF letter.doc

1|24.4

Bob Strawn

Mayor pro tem, Manhattan
&
Acquisitions
GAISC
1551 Williamsburg Court
Manhattan, Kansas USA 66502
Telephone: 785-587.0005
bob.strawn@gat.com
www.ga.com

Comment No: 1

Issue Code: 24.4

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

Strawn, Bob

Page 2 of 2



WD0189
Bob Strawn
GAISC Acquisitions &
Manhattan City Commissioner

5 August 2008

NBAF Program Manager

NBAF Site – Manhattan, Kansas

As Manhattan's Mayor pro tem, I encourage you to consider the merits of each site for construction of the NBAF facility. I am confident that our community will fully support the institution, if Manhattan is selected. And we will understand if it is not.

¹ cont.
24.4

I'm clearly not "objective" in my analysis of this competition, so my views regarding "merit" are hardly worthy. But I do want you to know that NBAF and its employees will be welcomed here by the vast majority of our citizens.

Families who come here will find a pleasant place, with excellent schools, and an affordable lifestyle. The facility, its mission and people will thrive in Kansas.

And so, we hope you choose K-State's Manhattan, Kansas site. As we wish you wisdom with this most difficult choice.

Respectfully,

Bob

RJS/s

Strecker, George

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PD0356

August 25, 2008

1) 5.0 | My name is George Strecker. I live in [REDACTED] Kansas. I'm opposed to siting the
2) 25.4 | NBAF anywhere on the mainland, but especially in Kansas. It's too dangerous and
3) 24.1 | should be built on Plum Island.

Comment No: 1 Issue Code: 5.0

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

Comment No: 2 Issue Code: 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 support for the Plum Island Site Alternative.

Strickland, Van and Mary

Page 1 of 1

WD0181

From: info@athensfaq.org on behalf of Van Strickland [REDACTED]

Sent: Tuesday, August 05, 2008 11:33 AM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 5.0 | Why in the world would you all consider placing such a dangerous facility in the middle of a population area such as the one being proposed for Athens, Ga.? The woods and pastures near the state botanical gardens are beautiful, and used daily by many, many people. Why not build somewhere more isolated? There are thousands of better places to do this than Athens, Ga.

2| 25.2 | Please consider this request. It is only common sense to do so. My family is strongly opposed to having this facility in such a sensitive location.

Sincerely,
Van Strickland

Comment No: 1 Issue Code: 5.0

DHS notes the commentor's preference for siting NBAF in a more isolated location. As described in Section 2.4.3 of the NBAF EIS, other potential locations to construct the NBAF were considered during the site selection process but were eliminated based on evaluation by the selection committee. It was suggested during the scoping process that the NBAF be constructed in a remote location such as an island distant from populated areas or in a location that would be inhospitable (e.g., desert or arctic habitat) to escaped animal hosts/vectors; however, the evaluation criteria called for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. The Plum Island Site is an isolated location as was suggested while still meeting the requirements listed in the Expression of Interest.

Comment No: 2 Issue Code: 25.2

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

Strickland, Van and Mary

Page 1 of 1

WD0731

From: info@athensfaq.org on behalf of Van Strickland [REDACTED]

Sent: Monday, August 25, 2008 1:50 PM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF,

1|25.2 Please do not locate your plant in Athens, Georgia. This is an environmentally sensitive area that is being considered; despite what the local politicians are saying, we as a community do not want the NBAF in Athens.

Thank you,
Van Strickland

Comment No: 1

Issue Code: 25.2

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

Studdard, Diane

Page 1 of 1

WD0693

From: Studdard [REDACTED]
Sent: Monday, August 25, 2008 10:22 AM
To: NBAFProgramManager
Subject: NO TO NBAF

1|25.0 | NO TO NBAF!!!

Diane Studdard
[REDACTED]

Comment No: 1 Issue Code: 25.0
DHS notes the commentor's opposition to the NBAF.

Sugiuchi, Chris

Page 1 of 1

WD0709

From: Sugi [REDACTED]
Sent: Monday, August 25, 2008 11:59 AM
To: NBAFProgramManager
Subject: NO NBAF FOR ATHENS

1|25.2 | We do not want this here. We're in a drought. This town is very liberal and folks are not reacting
2|12.2 | well to the thought of having this facility here.

--
~C.S.

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes. The South Milledge Avenue Site alternative would have access to 3 surface water resources: the North Oconee River, the Middle Oconee River, and the Jackson County Bear Creek Reservoir. The access to 3 surface water resources will help ensure the availability of water in the event that any one of those sources becomes inadequate. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management.

Suhling, Dave

Page 1 of 1

PD0296

August 25, 2008

Yes.

1| 25.4 | I don't think that you ought to build that in Manhattan, Kansas. There's too many people here and there's too much livestock here.

2| 5.0 | This needs to be put off the mainland. Put it at Plum Island because Plum Island's
3| 24.1 | already contaminated anyhow.

4| 15.4 | We do not need any kind of accidents in this part of the country because it would kill our livestock industry, and it would put a lot of people at risk.

My name is David Suhling, [REDACTED] Kansas.

Thank you.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 5.0

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

Comment No: 3 Issue Code: 24.1

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

Comment No: 4 Issue Code: 15.4

DHS notes the commentor's concern. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. As noted in Section 3.10.9 and Appendix D, the major economic effect from an accidental release of a pathogen would be a ban on all U.S. livestock products until the country was determined to be disease-free. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

Sullivan, Patricia

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CD0905

From: info@athensfaq.org on behalf of Patricia Sullivan [REDACTED]

Sent: Monday, August 25, 2008 2:11 PM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 25.2 I am strongly opposed to having NBAF in Athens, GA. The Environmental Impact Statement clearly shows that the Athens, GA site is not a safe site for the construction of NBAF.

Please do not act irresponsibly in the face of such overwhelming evidence.

Sincerely,

Patricia Sullivan

Comment No: 1

Issue Code: 25.2

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

Sultan, Jay

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PD0003

June 30, 2008

My name is Jay Sultan. I live a few miles away from your proposed site in Athens, GA.

I will not be at the meeting on Thursday, August 14th, I'm really not sure that I would want to go to it even if I could go, because I expect that there'll be a handful of extremists who will so dominate that meeting that it wouldn't be possible for me to express an alternate view.

I'm afraid that the Athens area, like many college institutions, has a small group of intolerant people that cannot stand any view other than their own, and who are convinced of the rightness of their views. It is the same people who wanted....have time and time again, stood in the way of trying to do the right thing for their own reasons.

My reason for calling this line was to say that there's probably an enormous volume of people who live in the Athens, GA, area and throughout the country, who are not going to put up billboards saying that this center is about promoting biological warfare, are going to come to your meetings throwing blood and hoping to pan into the cameras. I think that some portions of the population, like myself, recognize that this country's under threat, that it's very important that we create the tools necessary to fight that threat.

1| 1.0

2| 15.2

Despite the histrionics of the people who are opposed to what needs to be built, we're not the ones that have started this war. We're not the ones who have started using these weapons. We need to defend ourselves against those people who will. And, I don't think that there's an economical reason to put the center in Athens verses elsewhere. I don't think the jobs or the prestige to the university would matter. I mean we added the Center for Complex Carbohydrates at UGA, everybody thought that would be a huge boom to the economy, and it really hasn't been. I also don't think that the environmental....environmental impact is going to be an issue because I think the safeguards that ya'll have put in place are so high and the people who work there are going to both be so concerned for their own safety, and so much more knowledgeable about what the real safety issues are, than any of the people who will appear before you at these committee meetings....these public hearings, that it just makes no sense for us to get excited about these things.

3| 19.0

4| 23.0

What I do think is that our country needs to be prepared and that people like me need to stand up and say to the people who are screaming no bio war in Athens, that they just need to sit down. They probably don't know that research much like this has been carried on in the chemistry building on campus for over 20 or 30 years. They probably don't know that that was being done even while the stadium next door was filled with 80,000 fans. Even if they do know these things, I don't expect them to be rational about this. I think they're just going to simply say that they have their ultra-liberal views....ultra specific views that seem to say that no matter what the risk is to the country and to the world, it's right for them to do everything they can to stop the building of this facility, and I hope that you guys have the ability to look past their extremism, past their

1

Comment No: 1 Issue Code: 1.0

DHS notes the commentor's support for the research to be conducted at the NBAF.

Comment No: 2 Issue Code: 15.2

DHS notes the commentor's opinion. 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: 3 Issue Code: 19.0

DHS notes the commentor's statement. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF.

Comment No: 4 Issue Code: 23.0

See response to Comment No. 3.

Sultan, Jay

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PD0003

5| 1.0 narrow mindedness, and recognize how important it is to build this. I'd like to see you
6| 24.2 build it in Athens, but I want to see you build it somewhere.

I'm sure in every community you build it there's going to be somebody like the idiots in Athens who are going to be yelling, screaming no bio war, and I just hope that you'll hear from the rest of us who want you to ignore them and build what you have to build in order to protect our country.

Thank you again.

My name is Jay Sultan.

Comment No: 6

Issue Code: 24.2

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

Summers, Bob

Page 1 of 1

PD0088

August 18, 2008

1|25.4; This is Mrs. Bob Summers in ██████████ Kansas. We are definitely against that bio lab
2|5.0 being situated here - actually being situated anywhere on the mainland.

3|21.0 |It is just plain too dangerous for human beings as well as the animals.

Thank you.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 5.0

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

Comment No: 3 Issue Code: 21.0

DHS notes the commentor's concern. 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 the NBAF.

Sutherland, Suzanne

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WD0684

From: [REDACTED]
Sent: Monday, August 25, 2008 9:30 AM
To: NBAFProgramManager
Subject: NBAF - NO to construction of this facility in Butner, Granville Cty, NC

As a citizen of Durham County and active researcher who is aware of many of the hazards of researching diseases, I am absolutely opposed to the location of the National Bio and Agro-Defense Facility in Granville County, NC. The risks of endangering the local animals and population in a climate with virtually year-round mosquitos and of contamination to the environment, including the nearby Falls Lake which serves as the major water source for the Raleigh area is too great. The presumed threat of bioterrorism is speculative, while the real threat of endangerment to the local community and state by locating this lab here in an area where the community already houses a major state psychiatric hospital, prison and facility for the mentally retarded is much too great.

1|25.3;
 2|21.3;
 3|12.3;
 4|20.3;
 1Cont|25.3

I vote against the location of this facility in North Carolina.

Suzanne M Sutherland, M.D.
 [REDACTED]

Comment No: 1 Issue Code: 25.3

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

Comment No: 2 Issue Code: 21.3

DHS notes the commentor's concern. 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 the NBAF. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever [RVF] virus) becoming established in native mosquito populations was evaluated in Sections 3.8.9, 3.10.9, and 3.14 of the NBAF EIS. DHS would have site-specific standard operating procedures (SOP) and response plans in place prior to the initiation of research activities at the NBAF. RVF and foot and mouth disease SOPs and response plans would likely include strategies that are similar. However, the RVF response plan would also include a mosquito control action plan. The potential consequences of pesticide use would be evaluated during the preparation of a site-specific response plan.

Comment No: 3 Issue Code: 12.3

DHS notes the commentor's safety and water source concerns. The NBAF EIS Section 3.7.7 describes the water resources and potential construction and operational consequences from the proposed NBAF at the Umstead Research Farm Site alternative. Section 3.14 describes the hazard and accident analysis including site specific consequences.

Comment No: 4 Issue Code: 20.3

DHS notes the commentor's concern. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the Draft EIS. The risks were determined to be low for all site alternatives. The impacts analysis specifically included consideration of environmental justice concerns to include an assessment of the potential for disproportionately high and adverse effects to minority or low-income populations, as further described in Section 3.1 of the NBAF EIS. No disproportionately high and adverse effects to environmental or human resources are evident for the proposed Umstead Research Farm Site from normal facility operations.

Swank, Charles

Page 1 of 1

WD0362

From: Charles Swank [REDACTED]
Sent: Tuesday, August 19, 2008 2:47 PM
To: NBAFProgramManager
Cc: Charles Swank; Heather Swank; Mary Berry
Subject: Opposition to NBAF

To whom it may concern,

1|25.2 | I Charles Swank do hereby state that I am strongly opposed to
the possibility of the NBAF facility being located in Athens, Georgia.
2|21.2 | Me, my wife and 10 month old baby live approximately three miles
from the proposed site. We believe this facility would endanger us
as individuals and our community as a whole.

Charles D. Swank

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 concern. 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 the NBAF.

Taggart, Angie

Page 1 of 1

WD0470

From: [REDACTED]
 Sent: Friday, August 22, 2008 9:57 AM
 To: NBAFProgramManager
 Subject: vote on nbaf

- 1) 25.4 | I would like to add my opinion on the NABAF that is considering Manhattan Kansas as a
 2) 5.4 | new location. I do not want this type of facility in my state. I do not think it should be
 located on the mainland. I do not believe that we can be assured of our safety from
 accidents and malicious intent. I think that the diseases that are being studied are just too
 dangerous to be so near my family.
 3) 21.4 | Additionally, this type of facility could make us here in Kansas a target for terrorism.
 I believe that our safety and well being far outweigh the economic benefit of this facility. I
 choose safety over notoriety and money.

-Angie Taggart
 [REDACTED]

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 5.4

DHS notes the commentor's opinion regarding the siting, construction and operation of the NBAF at any of the five mainland site alternatives. 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.

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.

Tal, Gabriella

Page 1 of 1

WD0142

From: Gabriella Tal [REDACTED]
Sent: Friday, August 01, 2008 1:13 AM
To: NBAFProgramManager
Subject: I oppose the NBAF

1|25.0; I want to express my opposition to the NBAF - for environmental, security and human reasons, this is a
2|21.0 bad idea. There are vulnerable people in the area unable to evacuate in case of human error. There
would be environmental risks to the animals and people in the region. I strongly oppose this as I know
many other citizens do.
Gabriella Tal

Comment No: 1 Issue Code: 25.0
DHS notes the commentor's opposition to the NBAF.

Comment No: 2 Issue Code: 21.0
DHS notes the commentor's concern. DHS is aware of the presence of the health and correctional facilities, described in Section 3.10.7.1 of the NBAF EIS. DHS has held public meetings and conducted outreach efforts to ensure that the surrounding communities, including officials of the health and correctional facilities, are aware of the proposed action. The risks and associated potential effects to human health and safety were evaluated and are presented in Section 3.14. The risks were determined to be low for all site alternatives. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. A site-specific emergency response plan would be developed and coordinated with the local emergency management plan and individual facility plans regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF, and which would include stipulations for all special-needs populations.

Tant, Ed

Page 1 of 2

WD0223

From: [REDACTED] on behalf of [REDACTED]
Sent: Sunday, August 10, 2008 10:33 AM
To: NBAFProgramManager
Subject: OnlineAthens E-Mail a story to a friend

You've received a story from a friend.

Ed Tant [REDACTED] has sent you an article

1|25.2 | Ed Tant says: Athens, GA is a lovely town and we want to keep it that way. There is strong opposition to the NBAF lab in our community.

TANT: DOES ATHENS WANT, NEED HOMELAND SECURITY LAB?
EdTantmore Tant columns

"Why would a group of respected citizens, including business people, scientists, university administrators and politicians, attempt to recruit a Level 4 research facility that handles treacherous agents to our town? Simple: money."

Do those words sound familiar? Were they spoken at the recent meeting here in Athens between concerned citizens and U.S. Department of Homeland Security officials who propose to build the National Bio- and Agro-Defense Facility right here in Athens, on a pastoral plot of land near the State Botanical Garden?

This article is continued... To read the rest of the article, please visit:



Comment No: 1

Issue Code: 25.2

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

Tant, Ed

Page 2 of 2

WD0223

Tant: Does Athens want, need Homeland Security lab?

| Story updated at 12:08 AM on Saturday, March 1, 2008



Ed

Tant

[more Tant columns](#)

"Why would a group of respected citizens, including business people, scientists, university administrators and politicians, attempt to recruit a Level 4 research facility that handles treacherous agents to our town? Simple: money."

Do those words sound familiar? Were they spoken at the recent meeting here in Athens between concerned citizens and U.S. Department of Homeland Security officials who propose to build the National Bio- and Agro-Defense Facility right here in Athens, on a pastoral plot of land near the State Botanical Garden?

Actually, those words were written by Eddie Adelstein, an associate professor of pathology at the University of Missouri and an interim medical examiner in the state. His concerns were published in the Columbia (Mo.) Daily Tribune on May 22, 2007, before a location in that state was dropped from consideration as a possible NBAF site. Missouri is called the Show-Me State, and Adelstein showed an understandable skepticism when he called laboratories like NBAF, for which Athens-Clarke County remains on the short list, "a high-tech facility that belongs in a safer place."

No final site for the lab has been selected yet, but opposition to the facility is growing in areas where it might be built. In this area, NBAF opponents have formed a group called Athens' FAQ For Athens' Quality of Life (www.athensfaq.org) to question and, if possible, stop the building of the Homeland Security facility. Athens' FAQ has an uphill struggle ahead, because building the lab in Athens is supported by many moved movers and shakers at the University of Georgia, in the Athens Area Chamber of Commerce and in the media in this city.

Still, the NBAF lab might not be built without a fight in often apathetic Athens town. A Feb. 19 meeting between townspeople and backers of the NBAF facility from the university and Homeland Security drew some 500 concerned citizens, most of whom spoke out against the lab and peppered NBAF backers with much-needed questions about the facility. Although a Feb. 14 news release from the university promised that "each person approaching the microphone will be allowed one initial question and one follow-up question," in reality follow-up questions were squelched at the Feb. 19 meeting.

The question I voiced at the meeting was, "Since the Bush administration has in the past altered and edited scientific reports that conflict with its agenda, led us into an Iraq war under dubious and ever-changing rationales, and pushed re-bid contracts for its corporate friends, how can the citizens of Athens and America be expected to trust a Homeland Security Department that is a creation of an untrustworthy administration?" I'm still waiting for an answer to that question. I'm not alone.

In our neighboring state of North Carolina last month, the Raleigh City Council voted unanimously to oppose construction of the NBAF in the nearby town of Bunn, because of fears that it could contaminate a local reservoir. In January, the Granville (N.C.) County Commission withdrew its support because of growing opposition to the lab in the Tarheel State.

I was disappointed some years ago when an auto assembly plant that was eyeing Athens located instead in Alabama. Such a factory could have brought much-needed jobs to our area. I would not be disappointed to see Homeland Security and its NBAF lab locate far away from its proposed site here in Athens, where it might have a deleterious effect on the pristine beauty of the botanical garden, the river, Whitehall Forest and the rolling hills of the horse pasture where the lab would be built.

A letter printed in this newspaper on Feb. 22 used the hoary cliché of telling NBAF opponents to "[love it or leave it](#)." Concerned citizens and longtime residents of this area are opposing the NBAF precisely because they do love Athens in spite of all its faults.

Before scenic farmland and forest are changed forever to construct a biohazard lab, let's hope that the local powers-that-be will hearken to the admonition written by the poet William Wordsworth: "The World is too much with us; late and soon/ Getting and spending, we lay waste our powers;/ Little we see in Nature that is ours;/ We have given our hearts away, a sordid boon!"

* Tant has been an Athens columnist since 1974. His work also has appeared in *The New York Times*, *The Progressive* and other publications. For more, see his [Web site](#).

Published in the Athens Banner-Herald on 03/01/08

Tass, William

Page 1 of 1

PD0179

August 22, 2008

1) 24.1
2) 5.0
3) 21.4

Yes, I am William Tass from... I live in Kansas and I really believe that the bio safety laboratories should be kept on Plum Island and upgraded there. I see no compelling reason to move them from that location onto the mainland and put our livestock and people at risk in case of accident (which there have been at Plum Island and they have been contained). My understanding is there is sufficient acreage on Plum Island and the bottom line is this kind of facility has no place on the U.S. mainland. There can be no complete assurance of containment in case of accident and prevailing winds throughout the proposed United States locations would jeopardize livestock and human safety no matter where that location was. Plum Island—prevailing winds, are more likely to protect livestock and population from spread of any pathogens that might be released.

So again, please keep it on Plum Island. Upgrade those facilities.

And I thank you for this opportunity for comment.

Comment No: 1 Issue Code: 24.1

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative.

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives. Section 3.14 and Appendix E of the NBAF EIS evaluate the potential effects on health and safety of operating the NBAF at the six site alternatives. The evaluation concludes that a pathogen release at the Plum Island Site would be slightly less likely to result in adverse effects than the mainland sites.

Comment No: 3 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.

Tatum, Emily

Page 1 of 1

WD0004

From: joey_tatum [REDACTED]
Sent: Saturday, June 21, 2008 11:26 AM
To: NBAFProgramManager
Subject: athens ga is not the spot for NBAF

Hello,

¹ 5.2 This community does not want your NBAF. It needs to go to a community that is in need of jobs, like arizona or
² 25.2 new mexico. This community is a bunch of liberals who are opposed to it--it is already causing a lot of distress to
our community. Please do not put it here. thanks, emily tatum

Comment No: 1 Issue Code: 5.2

DHS notes the commentor's statement. The South Milledge Avenue Site was proposed by the local consortium in response to the request for expressions of interest and was considered along with the rest of the responses. DHS's alternative site selection process is described in Section 2.3.1 of the NBAF EIS.

Comment No: 2 Issue Code: 25.2

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

Tavernier, Vicky

Page 1 of 1

WD0848

From: [REDACTED]
Sent: Monday, August 25, 2008 8:24 PM
To: NBAFProgramManager
Subject: please, no NBAF

- 1 | 5.0 | Please don't bring the lab here. It's way too close to highly populated areas. What about the old Savannah River nuclear plant site. It's not being used now and it's got tons of concrete already.
- 2 | 5.2 | Why don't the scientist just go where the animals are already sick instead of making perfectly good animals sick? It's not a very valid testing situation. Most animals would get very sick on their own just having to live in a box within a box within a box. You need a more realistic testing arena. Please rethink this whole thing. Thank you, Vicky Tavernier

It's only a deal if it's where *you* want to go. Find your travel deal [here](#).

Comment No: 1 Issue Code: 5.0

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

Comment No: 2 Issue Code: 5.2

DHS notes the commentor's statement. The South Milledge Avenue Site was proposed by the local consortium in response to the request for expressions of interest and was considered along with the rest of the responses. DHS's alternative site selection process is described in Section 2.3.1 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.