

## Anonymous PD0374, Anonymous PD0374

## Page 1 of 1

PD0374

August 25, 2008

1|25.4 | No NBAF in Kansas. This is ridiculous to even consider putting this lab in the middle of farming and ranching communities. The opposition is not only made up of farmers and ranchers, but towns people from various walks of life, especially retired college professors who are not intimidated and afraid of loosing their jobs.

1 cont.| 25.4 | We do not want this facility in Kansas. The so-called economic impact that the  
2| 15.4 | proponents are proposing is not worth the economic disaster that could follow once it is in place.

1 cont.| 25.4 | Please, no NBAF in Kansas. Keep it on Plum Island.  
3| 24.1

Thank you.

Comment No: 1                      Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on risks to livestock. 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: 15.4

DHS notes the commentor's concern. The potential economic effects of an accidental release are discussed in Section 3.10.9 and Appendix D of the NBAF EIS. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the economic effect would be significant for all sites. To the extent possible, the NBAF EIS identifies differences in the magnitude of potential adverse impacts among the candidate sites if an accidental release of a pathogen were to occur. DHS has identified its Preferred Alternative in Section 2.6, which was based on a multitude of factors of which the safety of the human and physical environment and the protection of the U.S. livestock sector are paramount. A Record of Decision that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

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.

## Anonymous PD0375, Anonymous PD0375

## Page 1 of 1

PD0375

August 25, 2008

Thank you for this opportunity to comment. I'd like to begin by keeping my comments brief. I am a livestock producer in the ██████████ Kansas area, and I am very much against the NBAF going to be...to be located in Manhattan, Kansas.

Those of us who are native farmers and ranchers for generations in this area, this is about our lives, and an outbreak of foot and mouth disease or some other dangerous pathogens...an outbreak could completely wipe these farmers and ranchers out. This would no doubt have...would no doubt result in a...not only a huge loss of livestock and marketing, but also local economy and no doubt a government indemnity program if we can afford that on top of the cost of building this place.

Other things to consider, of course, are...an outbreak of this nature would involve, no doubt, animal deaths and what do you do with the carcasses? Where would they be buried? That's a real health concern. Incineration isn't that going to interfere with air space. We'd have to shut down transportation on I-70, which is a real major corridor for trade in the United States.

Just in short, I'd like to say that...add that, I think this research needs to be done. It would be great to have a vaccine for that, but I think that's something that needs to be done on Plum Island, off the mainland. And in the Manhattan area, people have had a lot of population shoved on them. We've had Fort Riley expansions. We've had the return of the Big Red Run to Fort Riley, and now to have more government pushed on us. We just would rather not see it here.

Thank you for 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: 15.4

Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Comment No: 3 Issue Code: 19.0

DHS notes the commentor's concern. Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment and disposal of animal carcasses and pathological waste. Burial of animal carcasses is not being considered as a disposal alternative. Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As discussed in this section, the final design for the NBAF will probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4. of the EIS (Air Quality) assumes that the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse effect. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 of the EIS (Infrastructure) assumes that alkaline hydrolysis will be used to assess the maximum sanitary sewage impacts.

Comment No: 4 Issue Code: 18.0

See response to Comment No. 3.

Comment No: 5 Issue Code: 23.0

The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Should the NBAF Record of Decision call for the design, construction, and operation of the NBAF then site-specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and response plans in place prior

to the initiation of research activities at the NBAF. Section 3.8.9 of the NBAF EIS addresses existing and potentially applicable response plans that provide insight into some of the livestock and wildlife protective and mitigating measures that could be employed in the event of a pathogen release from the NBAF.

Comment No: 6                      Issue Code: 9.0

The potential effects of NBAF construction and operations on air quality are discussed in Section 3.4 of the NBAF EIS. Section 3.4.1 describes the methodology used in assessing potential air quality consequences at each site. Potential construction emissions were extrapolated from a similar facility's construction approach to ozone precursors, nitrogen oxide, and volatile organic compounds. For operations, the U.S. Environmental Protection Agency dispersion modeling program, SCREEN3, was used to predict potential bounding case emissions at each site based on the current state of facility design. Should a decision be made to build the 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.

Comment No: 7                      Issue Code: 17.4

DHS notes the commentor's concerns about accidents at the NBAF. A discussion of human health and safety including the potential risk and consequences of an accident occurring at the NBAF is included in Section 3.14 of the NBAF EIS. The potential economic effects of an accidental release at the Manhattan Campus Site are described in Section 3.10.9.2 of the NBAF EIS and in Appendix D of the NBAF EIS. An emergency response plan that would include area evacuation routes, would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations. As to the commentor's concern regarding the potential impact an accident at the NBAF would have on I-70, the analysis of socioeconomic/commerce impacts for closure of I-70 is beyond the scope of the EIS.

Comment No: 8                      Issue Code: 1.0

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

Comment No: 9                      Issue Code: 24.1

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

Comment No: 10                      Issue Code: 5.0

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

## Anonymous PD0377, Anonymous PD0377

## Page 1 of 1

PD0377

August 24, 2008

Yes.

1) 25.4 | I'm calling on my own behalf as a producer. I am in total opposition of the NBAF  
 2) 5.0 | locating in Kansas. I don't believe it should be anywhere on the mainland in the United  
 3) 24.1 | States. It should remain on Plum Island and update it. The research should continue, but  
 not on the mainland, not in the heartland of Kansas.

1 cont. | 25.4 | Please do not put NBAF here. Aids started with a monkey, black plague with a rat.  
 I think the same could happen with NBAF.

Please do not let this happen.

Thank you so much for listening.

Bye.

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 in favor of updating the PIADC facility. 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.

Comment No: 3      Issue Code: 24.1

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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.

**Anonymous PD0378, Anonymous PD0378**

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**PD0378**

August 25, 2008

1| 25.0 | I'm saying no to this....saying no to the deadly germ lab that they want to put in.

Thanks.

Comment No: 1

Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF.

## Appel, Sheri and Jon

## Page 1 of 2

WD0479

From: [REDACTED]  
 Sent: Friday, August 22, 2008 11:31 AM  
 To: NBAFProgramManager  
 Subject: NBAF in Kansas

Dear Sir,

1| 25.4 I am writing to lobby **against** the National Bio- and Agro Defense Facility in Manhattan, Kansas  
 2| 5.4 or really any other urban area or non isolated environment. The lab is a needed and necessary  
 part of the efforts to protect American agriculture and the health of its citizens. I applaud  
 that. DHS must find a place for it outside of a major university town where many of the students  
 and faculty have connections to the farm. The drawbacks of a intentional or unintentional  
 release of a pathogen are many as you are aware but consider this about Manhattan,Kansas:

- 3| 16.4 • The athletic center of town for basketball and football of Kansas State University is less  
 than 1 mile from the proposed site. A release would render these sites inactive for an  
 unspecified period of time. If the release occurred during an event, then mass chaos would  
 occur controlling and stopping the migration of these people outside of the control area.
- 4| 19.4 • The site is within a major university. A breach could cause the non use of the university or  
 its related facilities. A severe blow to the local community and to the educational system  
 of the state of Kansas and the nation.
- 5| 15.4 • It is possible that if a breach occurred that a rural resident could be within the infested area  
 and leave before control was initiated and could carry a pathogen to outside of the control  
 area. The destination of this individual and vehicle could be within a six state area. Many  
 square miles of agriculture could be exposed.
- 6| 21.4 • The city of Manhattan and surrounding agriculture would face major harm to the residents,  
 city and county tax base, property values, and their very livelihood with a release.
- 7| 21.4 • A major tomado would wreck havoc on Manhattan. We just escaped a small one this year  
 but it caused plenty of damage. We don't need the worry of the NBAF being hit also  
 which could ultimately limit rescue efforts in a community where resources are limited.  
 NBAF may be able to survive a hit from a tomado but the cleanup would still pose many  
 risks to the immediate community and surroundings.
- The NBAF close to a major military installation may make the area a more high risk  
 visible target to our enemies in the world.

2 cont.| Find a location out in the desert or on an island. **Take the extra step away from an urban**  
 5.4 **agricultural university setting and practice precaution for the unthinkable.**

Thank you for allowing us to comment.

Sheri and Jon Appel

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative and other urban sites. 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: 5.4

DHS notes the commntor's concern about siting NBAF. Please refer to the response in Comment No. 1.

Comment No: 3 Issue Code: 16.4

DHS notes the commentor's opinion regarding the effects of a release on nearby athletic events. The types of exposure pathways for the various pathogens to be studied at the NBAF and potential consequences were evaluated in Section 3.14 of the Draft EIS. The risk of a pathogen release from the proposed NBAF at each of the proposed sites was evaluated in Section 3.14 of the EIS and was determined to be low for all sites, however DHS acknowledges that if a pathogen were released the effects could be significant.

Comment No: 4 Issue Code: 19.4

DHS notes the commentor's opinion regarding the effects of a release on the university. Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Comment No: 5 Issue Code: 15.4

DHS notes the commentor's concern. Please refer to the response in Comment No. 4.

Comment No: 6 Issue Code: 21.4

DHS notes the commentor's concern. Please refer to the response in Comment No. 4 regarding the economic impacts of a release.

Comment No: 7                      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.

Appel, Sheri and Jon

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WD0479

[REDACTED]

[REDACTED] Kansas

Jon and Sheri Appel

**Armbrust, John**

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WD0667

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**From:** John Armbrust [REDACTED]  
**Sent:** Friday, August 22, 2008 5:42 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF Belongs in Kansas

1|24.4 | I fully support NBAF being in Kansas and specifically at Kansas State University. I base my support on the fact that Kansas is unique in its ability to protect our country's food supply and agricultural economy, as well as the fact that Kansas meets all the DHS selection criteria for housing the new NBAF.

You will make the right choice when you select Kansas and Kansas State University as the site for NBAF!

John Armbrust

Comment No: 1

Issue Code: 24.4

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

**Armbrust, Trent**

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PD0262

August 24, 2008

1|24.4

Trent Armbrust calling in support of the NBAF in Manhattan, Kansas. We are a community that is able to provide all the necessary community support in research and homes and all the community infrastructure that is required for NBAF to be here. And I think it would be a very successful venture between Kansas State University, Manhattan, Kansas, and the Department of Homeland Security. And I think NBAF would be a great success here at Manhattan, Kansas.

Again, this is Trent Armbrust in support of NBAF in Manhattan, Kansas.

Bye.

Comment No: 1

Issue Code: 24.4

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

## Armstrong, John

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WD0456

**From:** John Armstrong [john@leadhorsetech.com]  
**Sent:** Friday, August 22, 2008 3:15 PM  
**To:** nbafterprogrammanager@dhs.gov  
**Cc:** Ramie Leibnitz; info@kansasbio.org; rod.barnes@jcks.com; JOHN MAJERUS  
**Subject:** Company endorsement for Manhattan, Kansas to be chosen as the site for the NBAF

To whom it may concern at the Department of Homeland Security:

1| 24.4 | As the Chairman and CEO of Lead Horse Technologies, Inc., I would like to emphasize our  
 2| 8.4 | desire to have Manhattan, Kansas selected as the site of the National Bio and Agro-Defense  
 Facility (NBAF). Justification for selecting Manhattan, Kansas as the nation's smartest choice  
 for the NBAF site include the region's unique ability to protect America's food supply and  
 agricultural economy. However, there are other reasons as well. Nearby Junction City, Kansas  
 is home to the new Tom Neal Technology Park, and component biotech companies for that park  
 include billion dollar companies Ventria Biosciences and EdenSpace. In addition, our company,  
 Lead Horse Technologies, Inc., is a personalized medicine company that relocated to the  
 Junction City/Manhattan, Kansas area a year ago from Denver, Colorado for reasons  
 additionally justifying Manhattan as a prime site for the NBAF. Lead Horse Technologies  
 required research expertise and infrastructure, access to talent, public support and state  
 cost share, and we have been fortunate to be able to take advantage of all of those incentives.  
 Lead Horse Technologies has received nothing less than red carpet treatment and open arms of  
 welcome since arriving in the Junction City/Manhattan region last summer. I wholeheartedly  
 1 cont.| 24.4 | endorse Manhattan, Kansas as a site that stands to serve the nation well in its efforts to  
 strengthen and innovate in the areas of Bio- and Agro-defense. Please do not hesitate to  
 contact me directly for clarification or elaboration on any of the details that may be of help to you  
 with respect to the breadth of economic development offerings, research strength, talent pool,  
 and/or other aspects of this extremely biotech-friendly area.

Thank you and best regards,  
 Dr. John Armstrong

**John M. Armstrong, Ph.D.**  
 Chairman and CEO  
 Lead Horse Technologies, Inc.  
 Office: (785) 238-5666  
 Cell: (303) 408-6707  
 Fax: (785) 223-5666  
 Email: john@leadhorsetech.com  
 www.leadhorsetech.com

Comment No: 1                      Issue Code: 24.4

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

Comment No: 2                      Issue Code: 8.4

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

Armstrong, Lacy

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CD0502

**From:** [REDACTED] on behalf of Lacy Armstrong [REDACTED]  
**Sent:** Monday, August 25, 2008 3:19 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Athens, Georgia

I as well as others have several concerns with the NBAF project here in Athens, GA and will attempt to address them below.

- 1| 13.2 | The DEIS seems to gloss over the effect of NBAF on the environment of the State Botanical Garden and Important Bird Area in Athens, GA.
- 2| 15.2 | Will the Final EIS correct this deficiency or is the quality of life of Athenians not important to the DHS?
- 3| 21.2 | The DEIS discloses an "insectary" where disease-spreading mosquitoes and other "vectors" will be bred. It also discloses that any release of pathogen, because of our warm, humid climate, could cause the disease to become permanently established in our community.
- 4| 23.0 | How would DHS respond to a release of mosquitoes and other vectors? Even the inevitable release of just one. The EIS needs to show a detailed plan.
- 5| 6.2 | There is no mention in the DEIS of moving the horses and relocating the many functions that take place yearly at the recently-built Livestock Instructional Arena already existing at the planned NBAF site in Athens, GA. The FEIS must address this "elephant in the room." NBAF does not belong in Athens and certainly not at this beautiful site that is already at its highest and best use.
- 6| 8.2 |
- 7| 25.2 | The DEIS clearly shows that the Athens, GA site is neither safe nor compatible from an environmental standpoint for the construction of NBAF.

Please do not act irresponsibly in the face of such overwhelming evidence. NBAF should not be in Athens.

We are strongly opposed to NBAF and will continue to actively work against any effort to bring NBAF to our community.

Sincerely,  
Lacy Armstrong

Comment No: 1                      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.

DHS notes the commentor's concern regarding the proximity of the site to the State Botanical Garden and the Whitehall Forest Important Bird Area (IBA). As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden or IBA. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with the IBA. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high-value forested riparian corridor would be preserved; and therefore, the NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and the IBA. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Birds are not susceptible to diseases that are currently designated to be studied at the NBAF. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF. Furthermore, the purpose of the 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: 2                      Issue Code: 15.2

DHS notes the commentor's concern. Adverse effects to quality of life resources would not be expected with any of the site alternatives and are discussed in Section 3.10.

Comment No: 3                      Issue Code: 21.2

DHS notes the commentor's concerns regarding an NBAF accident and subsequent introduction of a new pathogen into the environment. 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 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations was evaluated in Section 3.8.9 and Section 3.10.9 as well as in Section 3.14. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. RVF and FMD SOPs and response plans would likely include strategies that are similar. However, the RVF response plan would also include a mosquito control action plan.

Comment No: 4                      Issue Code: 23.0

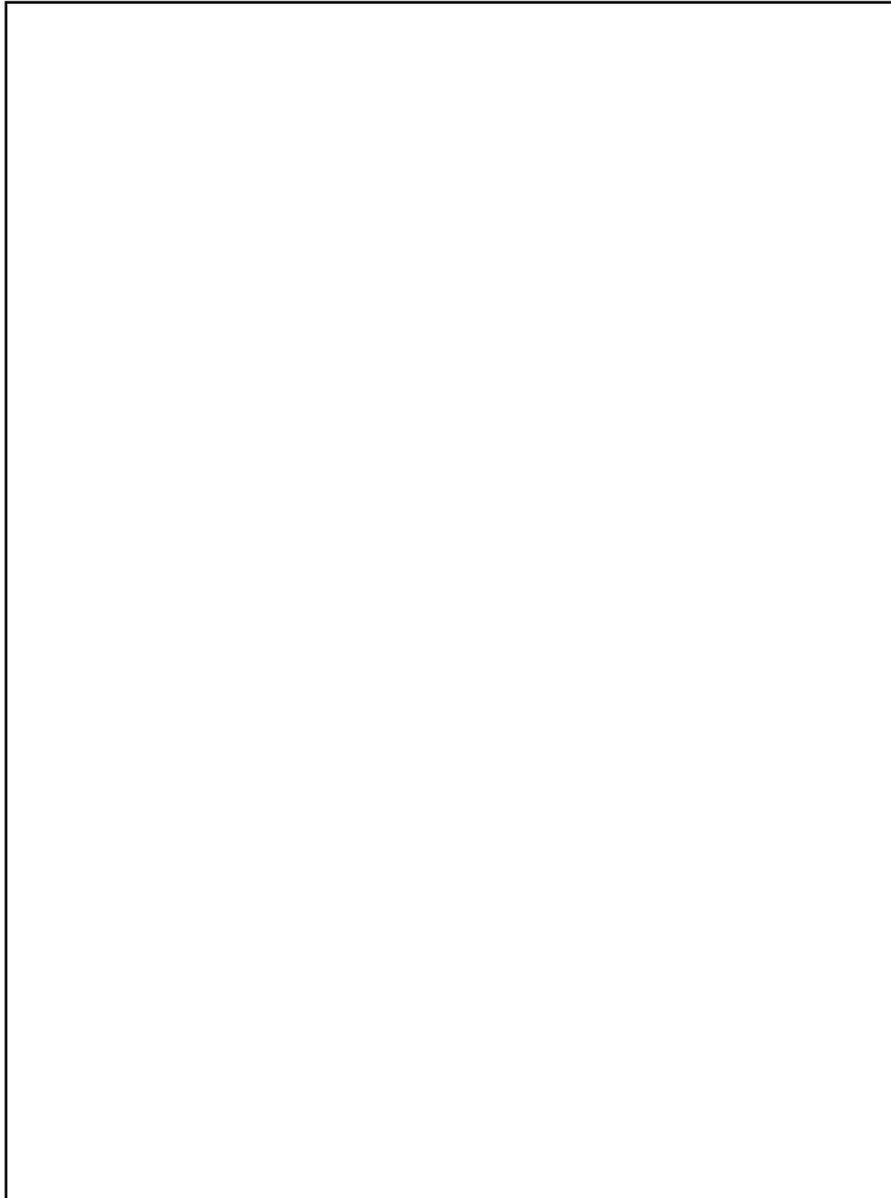
DHS notes the commentor's concerns regarding the site specific plans to respond to the accidental release of a vector, such as a mosquito, from the NBAF. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the South Milledge Avenue Site, site specific protocols 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 and wildlife. 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. Information has been added to Chapter 2 regarding operations and containment of arthropod vectors. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the South Milledge Avenue Site is specifically addressed in Section 3.8.9 and Section 3.10.9.1 as well as in Section 3.14.4.1 (Health and Safety). Section 3.10.9.1 discusses the relative suitability of the regional climate of the South Milledge Avenue Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.3.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Comment No: 5                      Issue Code: 6.2

DHS notes the commentor's concern. The decision as to what to offer (land donation) is solely at the discretion of the consortium, state, and local officials as part of the consortium bid site package. If the decision to build the NBAF at the South Milledge Avenue Site is selected, the University would need to provide alternative arrangements for any temporary use of the site.

Comment No: 6                      Issue Code: 8.2

DHS notes your concern. The University of Georgia Livestock Instructional Arena is located outside the site boundaries of the proposed NBAF South Milledge Avenue Site. A discussion of the impact on



adjacent facilities and land use from the construction and operation of the NBAF at the South Milledge Avenue Site Alternative is found in Section 3.2.3 of the NBAF EIS. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The risk of an accidental release of a pathogen with the potential to affect nearby livestock or wildlife is extremely low. Consequently, DHS would not anticipate having to enact any provisions to preemptively exclude or remove nearby populations of livestock or other animals at the South Milledge Avenue Site or any other site, assuming a decision is made to build NBAF. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. Nevertheless, should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies, that would consider the diversity and density of human, livestock, and wildlife populations residing within the area.

Comment No: 7                      Issue Code: 25.2

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

**Armstrong, Michael**

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PD0227

August 22, 2008

1|24.5 | Hi, my name is Michael Armstrong and I live and work in [REDACTED]. And I wanted to voice my strong support of having NBAF here. I have educated myself on the facility and I believe it's perfectly safe and I believe it will be a great asset to our State and our community.

Thank you.

Comment No: 1

Issue Code: 24.5

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

**Arredondo, Kristie**

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WD0491

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**From:** Kristie Arredondo [REDACTED]  
**Sent:** Friday, August 22, 2008 12:41 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Kansas

1 | 24.4 | I support NBAF in Kansas.

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[Kristie Arredondo Hill's Pet Nutrition, Inc.](#) | US [REDACTED] Plant: Plan & Sched Mfg |  
[REDACTED]  
[REDACTED] KS

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

Ash, Mary

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WD0845

**From:** Mary Ash [REDACTED]  
**Sent:** Monday, August 25, 2008 8:01 PM  
**To:** NBAFProgramManager  
**Subject:** NO NBAF IN KANSAS/Fwd: [Biolabs] Strong statement from Congressmen Dingell and Stupak

1|27.0 | Just in case you have not paid attention to the following.

Mary Ash  
 [REDACTED] KS

>> NEWS RELEASE  
 >> Committee on Energy and Commerce  
 >> Rep. John D. Dingell, Chairman  
 >>  
 >> For immediate release: August 8, 2008  
 >> Contact: Jodi Seth or Alex Haurek, [REDACTED]  
 >>  
 >> Energy and Commerce Committee to Expand Investigation of Biosafety Labs to  
 >> Include Fort Detrick  
 >> Lawmakers Call on Bush to Suspend Construction of New Labs  
 >>  
 >> Washington, DC - Reps. John D. Dingell (D-MI), Chairman of the Committee on  
 >> Energy and Commerce, and Bart Stupak (D-MI), Chairman of its Subcommittee on  
 >> Oversight and Investigations, announced today that the Committee is  
 >> expanding its investigation into the risks associated with biosafety level 3  
 >> and 4 labs to include an examination of personnel security at these labs.  
 >> Among others, the Committee will specifically review personnel security at  
 >> Fort Detrick, the government's biodefense lab in Maryland, which employed  
 >> scientist Bruce Ivans, the main suspect in the 2001 anthrax attacks.  
 >>  
 >> The lawmakers are also calling on President Bush to immediately initiate his  
 >> own investigation into allegations about personnel security at the United  
 >> States Army Medical Research Institute of Infectious Diseases as well as all  
 >> other biosafety level 3 and 4 labs operated or funded by the federal  
 >> government. They specifically urged the President to issue a government  
 >> wide moratorium on the construction of any new level 3 and 4 labs until such  
 >> a review is completed and its results provided to the appropriate  
 >> congressional committees.  
 >>  
 >> "I'm deeply troubled by the allegations raised about security at one of our  
 >> nation's premier labs handling some of the deadliest germs in the world,"  
 >> said Dingell. "Our nation is at serious risk if one of our government's  
 >> most prominent scientists could have a decade long battle with mental  
 >> illness without anyone noticing. The Committee will continue working on  
 >> identifying security shortcomings at these facilities and determining how  
 >> best to rectify the problems. We encourage concerned individuals, community  
 >> groups and local governments around the country who have specific

Comment No: 1      Issue Code: 27.0  
 DHS notes the information submitted by the commentor.

Ash, Mary

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WD0845

>> allegations of security breaches and safety problems to contact our staff."  
>>  
>> Biosafety level 3 and 4 (BSL 3 & 4) labs are facilities where research is  
>> conducted on highly infectious viruses and other biological agents that can  
>> cause serious injury or death. Some of the world's most exotic and  
>> dangerous diseases are handled at such facilities, including anthrax, foot  
>> and mouth disease, and the Ebola virus. The Committee launched an inquiry  
>> into the risks associated with these labs because of their rampant  
>> proliferation in the last few years.  
>>  
>> "We have already held two hearings on the risk associated with the  
>> proliferation of high containment (Level 3 and 4) labs including the  
>> physical and personnel security issues related to their operations," said  
>> Stupak. "What we have learned so far is troubling. We have found poor  
>> training, lax security and very little oversight and coordination by our  
>> government agencies. Perhaps most frightening is the fact that no single  
>> government agency is in charge of approving and monitoring Level 3 and 4  
>> labs and their personnel. Nobody can tell us how many labs there are, who  
>> is working in the labs, what agents or pathogens are being worked on in the  
>> labs, and whether adequate background checks have been done on employees of  
>> the labs."  
>>  
>> To date, the Committee has held two hearings on October 4, 2007 and May 22,  
>> 2008 (For more information about the Committee investigation or the hearings  
>> visit (<http://energycommerce.house.gov/Investigations/BSL3Labs.shtml>)). The  
>> Committee has also requested a study by the Government Accountability Office  
>> (GAO) of the safety risks associated with biosafety level 3 and 4 labs.  
>>  
>> The full text of the letter to President Bush is below.  
>>  
>>  
>> August 8, 2008  
>>  
>>  
>>  
>> The President  
>> The White House  
>> 1600 Pennsylvania Avenue, N.W.  
>> Washington, D.C. 20500  
>>  
>> Dear Mr. President:  
>>  
>> We write to you today about a most urgent public health and national  
>> security issue. This week the Federal Bureau of Investigations (FBI)  
>> officially made a number of serious allegations about Dr. Bruce Ivins, a  
>> former senior scientist with the U.S. Army's Medical Research Institute for  
>> Infectious Diseases (USAMRIID) at Fort Detrick in Frederick, Maryland.  
>>  
>> If these allegations are true, the FBI has identified serious weaknesses in  
>> the security at one of our Nation's premier laboratories for the study of  
>> some of the most deadly pathogens in the world. Their allegations also  
>> raise equally troubling security concerns about the thousands of other  
>> scientists and technicians who work at hundreds of labs across our country  
>> with "select biological agents" such as anthrax.

Ash, Mary

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>>  
>> In light of these recent revelations, we urge you to immediately order a  
>> Government-wide investigation into the adequacy of the physical and  
>> personnel security systems in place at all Government-run or -sponsored  
>> Biosafety Level 3 and 4 laboratories (BSL 3 and 4) in the United States. In  
>> addition, until your investigation is complete and the results of that  
>> investigation are reported to you and Congress, we urge you to order the  
>> suspension of all further design and construction of such laboratories.  
>>  
>> Biosafety Level 3 and 4 laboratories are facilities where research is  
>> conducted on highly infectious viruses and other biological agents that can  
>> cause serious injury or death. Some of the world's most exotic and  
>> dangerous diseases are handled at such facilities, including anthrax, foot  
>> and mouth disease, and the Ebola virus.  
>>  
>> Our concern about the security at USAMRIID and other BSL 3 and 4  
>> laboratories is neither new nor solely based upon the FBI's recent  
>> allegations. It stems in part from our Committee's year-long investigation  
>> into the risks associated with the proliferation of such laboratories since  
>> September 11, 2001. The Committee has already held two hearings on the  
>> subject on October 4, 2007, and May 22, 2008, the records of which are  
>> available on our Committee's Web site at <http://energycommerce.house.gov/>.  
>>  
>> Our investigation identified serious shortcomings with the security at  
>> facilities that are run by universities and the civilian agencies of the  
>> Government, especially those run by the Science and Technology Directorate  
>> of the Department of Homeland Security, which I note with some trepidation  
>> has a new BSL 4 lab on the Ft. Detrick grounds adjacent to USAMRIID.  
>>  
>> What we have learned so far has been frightening. We have found poor  
>> training, sloppy security, and very little, if any, oversight by the  
>> Government agencies who are supposed to be responsible for protecting our  
>> community. We also uncovered a number of serious releases of dangerous  
>> pathogens and injuries to lab workers.  
>>  
>> Our preliminary findings indicate there appears to have been no overall  
>> planning to justify the massive increase in the construction of these labs  
>> since 2001, which was almost entirely paid for by the American taxpayer. We  
>> found that many of the labs are probably unnecessary or redundant.  
>> Shockingly, the Government Accountability Office (GAO) reported that no one  
>> in the Government even knows the total number of BSL 3 and 4 labs currently  
>> in existence. Ironically, their proliferation has only exacerbated the  
>> potential risk of a terrorist incident or accidental release, not enhanced  
>> our Nation's security.  
>>  
>> The bottom line, Mr. President, is that no one is in charge of all of these  
>> laboratories from a safety and security perspective. We urge you to rectify  
>> this issue in the course of your inquiry.  
>>  
>> We plan to continue our investigation working not only with the Government  
>> Accountability Office, but also with community groups that have brought a  
>> number of serious concerns to us. In early September 2008, we expect to  
>> receive yet another report from GAO, an interim report on its assessment of  
>> physical security at the five BSL-4 laboratories currently in operation.  
>>

Ash, Mary

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>> The Nation, however, cannot wait until our investigation is complete.  
>> Accordingly, we urge you to act now in order to ensure that USAMRIID and the  
>> other laboratories are secure. We look forward to working with you and your  
>> Administration in rectifying this serious national security threat.  
>>  
>> Sincerely,  
>>  
>> John D. Dingell  
>> Bart Stupak  
>> Chairman  
>> Chairman  
>>  
>> Subcommittee on Oversight and Investigations  
>>  
>>  
>>  
>>  
>>  
>> cc: The Honorable Joe Barton, Ranking Member  
>> Committee on Energy and Commerce  
>>  
>> The Honorable John Shimkus, Ranking Member  
>> Subcommittee on Oversight and Investigations  
>>  
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>>  
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>> Biolabs mailing list  
>> [Biolabs@lists.cpeo.org](mailto:Biolabs@lists.cpeo.org)  
>> <http://lists.cpeo.org/listinfo.cgi/biolabs-cpeo.org>  
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>>  
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>>

Ash, Mary

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WD0525

**From:** Mary Ash [REDACTED]  
**Sent:** Sunday, August 24, 2008 8:44 PM  
**To:** NBAFProgramManager  
**Subject:** NO NBAF IN KANSAS!

1) 25.4 Following are the reasons I am profoundly opposed to the NBAF being located in Manhattan, Kansas.

2) 21.4 1) To be researched are the most deadly pathogens on this planet for which there are no known treatments or cures. Any accidental, or intentional, releases could have catastrophic consequences.

2) 21.4 2) Foot and Mouth Disease (FMD) is the most highly infectious and contagious animal disease known. There are numerous types and many more subtypes. There are few vaccines and one does not protect against the other types.

3) 15.4 3) The economic consequences of a FMD outbreak are higher here than at any other proposed site--\$4.2 billion dollars in Riley County alone.

4) 1.0 4) A well-respected infectious disease research scientist has stated that vaccination against foreign animal diseases is not an acceptable practice as it makes it difficult to distinguish truly infected (and potential carriers) from those that have been vaccinated. As such, while there are vaccines that provide some degree of protection, none are allowed to be used in the United States or other certified disease free countries.

2 cont.) 21.4 5) The proponents say the risks are minimal 99.4+ safe. Yet one accidental could be totally devastating to this area (or any other area).

6) There are examples after example where scientists have said that outbreaks could not occur in their labs, but they have. There is no place for arrogant certainty by a scientist of no risk in this line of research.

5) 5.4 7) There is no "best" place to conduct the research, but there are differences in the consequences of a disease release. The worst would be a location where a release would be the most difficult to contain and the most costly. In order, the worst place would be in an area of high animal density; better would be an isolated location with few animals (e.g. Winnipeg, Canada), and best would be a location where there are no animals, a natural barrier, and is easy to quarantine (e.g. an island).

8) With the exception of Canada and Australia, all other such facilities are on islands, not the mainland. Australia now wishes they had placed theirs on an island. Proposed sites for such labs in other countries are all on islands.

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 regarding the potential consequences from a NBAF accident or pathogen release as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B of the NBAF EIS provides a comprehensive list of BSL-3 and BSL-4 laboratory accidents results, and consequences of the accidents Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

DHS notes the commentor's concerns regarding the handling and transport of packages containing pathogens. The general regulations governing the required NBAF handling and transport of packages containing pathogens, and a discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. Section 2.2.2.3 provides detailed information on the handling and transport of packages containing pathogens. Additionally, an analysis of accidental releases during transportation is provided in the NBAF EIS under Section 3.14, Health

and Safety. Information regarding the existing road conditions and potential effects to traffic and transportation from the Manhattan Campus Site Alternative is provided in Section 3.11.4 of the NBAF EIS.

Comment No: 3                      Issue Code: 15.4

Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Comment No: 4                      Issue Code: 1.0

The goal 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 that could be used if required.

Comment No: 5                      Issue Code: 5.4

DHS notes the commentor's statement. 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.

Ash, Mary

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WD0525

6| 2.0 | 8) Because of the level of research to be done here, the Freedom of Information Act would not apply. The citizens would not know, and could not find out, what deadly pathogens would be brought in.

2 cont.| 21.4 | 9) These pathogens would be delivered via our highways; If an accident/release were to occur in transit, NO level of containment exists there.

6 cont.| 2.0 | 9) We can not ignore the problem of "dual-purpose". The same disease organisms and methods used for legitimate bio-defensive research could, in the wrong hands, just as easily be used to make bio-weapons.

5 cont.| 5.4 | 10) This germ lab would be located near vulnerable human and animal populations. The proposed site is within one mile of a retirement community, an affordable-housing complex, a student recreational facility, a football stadium and a basketball arena (what of an outbreak on game days--Nebraska, Iowa??), student housing, a soon-to-be-built childcare center, and two busy thoroughfares; 450,000 livestock are maintained in Riley County and in adjacent counties.

7| 4.4 | 11) Those employed by Kansas State University and the City of Manhattan have been unable to freely express their opposition to this facility locating here due to their valid concerns of loss of funding and retaliation. Please check your records; I suspect you have few opposing comments from these people. This facility does NOT have the level of support from the university and community that officials are relaying to DHS.

There are many more reasons; this is the short list.

Mary Ash

██████████ Kansas

Comment No: 6

Issue Code: 2.0

DHS notes the commentor's concern regarding the research conducted at the facility. The NBAF's mission is defensive and would not involve offensive bioweapons research or development. The international treaty known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. 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. NBAF will research the transmission of these animal diseases and develop 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. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Additionally, DHS and USDA intend to publish their research just as they do now at PIADC. The NBAF would be subject to FOIA and any exemptions that might apply to a given document. DHS FOIA office will respond to all requests.

Comment No: 7

Issue Code: 4.4

DHS notes the commentor's concern regarding suppression of dissenting opinions among KSU and City of Manhattan employees. DHS is committed to free and open public involvement during development of the NBAF EIS and welcomes comments.

## Askew, Catherine

## Page 1 of 1

PD0029

July 27, 2008

Hi,

My name is Catherine Askew. I live in the [REDACTED] area. I bought my home there thinking I would be safe, and I find I am not safe.

I'm speaking up for myself, the people in my community, my animals. And one thing that's really, really important is the people at Murdock Center who are retarded and can't speak. I'm speaking for them.

1| 25.3 | We do not, I repeat, do not, want this lab in Butner.

2| 5.0 | Please, please put it somewhere else. Put it away from people. People in Murdock are retarded. If you have a retarded child or you know someone retarded, you know what I'm talking about.

3| 20.3 | You got mentally ill people there. You got the prison with all those people. Also, the samples of whatever you take into the lab are gonna be brought there by truck by I-85.

4| 17.3 | That is right in my front yard, and this year we've had two accidents. Two big trucks blew up in front of my yard on I-85. Blew up! A car ran into them. So, don't tell me accidents can't happen. They will.

Please, please don't put it there.

Thank you.

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: 20.3

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.

Comment No: 4                      Issue Code: 17.3

DHS notes the commentor's concern. A discussion of existing road conditions and potential effects to traffic and transportation at the Umstead Research Farm Site Alternative are located in Section 3.11.7 of the NBAF EIS. A description of transportation shipments of infectious materials is included in Section 3.11.9.

Askew, Catherine

Page 1 of 1

PD0051

August 8, 2008

Hello,

My name is Catherine Askew. I live at [REDACTED] North Carolina. I have a comment to make. If another state wants this facility, please take it there. Please take it. I heard Mississippi wanted it really bad. Well, why not give it to them, because

1|25.3 | Butner does not want it, and also...I'm speaking for my family, my animals. And I'm also speaking for...I'm a nurse, an RN. I work in Murdock Center part time. I'm retired, and I thought I was buying a house that was in a safe...I just bought this house three years ago. I thought I was building a house in a safe area, and now I find I am not, and it's very distressing.

2|17.3 | A lot of people are thinking about selling their houses here because of this lab, and I-85 runs in my front yard. So in case any of the little creatures are going into the lab, I'll be the one to see them going by I-85. And anything can happen to a truck. You can have a wreck at any time. But basically, I'm calling to say...I'm speaking for the patients at Murdock Center who are profoundly retarded. There's at least 800 there, so I'm saying they can't talk. They can't walk. Some of them can't feed themselves, and they go outside. So why are you putting something like this...why are you putting these people in danger?

3|19.3 | If you have a mentally retarded child or cousin, or have a family that has a mentally retarded person in their family, take a look at that - that's what you're doing. You're just killing that person and they can't talk, and they can't pick up this phone and say, please don't put this lab here, please, don't put this lab here. Mentally retarded cannot say  
1 cont. | please don't put this lab here. So, I'm saying for them, please, please take it somewhere  
25.3 | else.

Thank you for this opportunity.

Good bye.

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: 17.3

DHS notes the commentor's concern. A discussion of existing road conditions and potential effects to traffic and transportation at the Umstead Research Farm Site Alternative are located in Section 3.11.7 of the NBAF EIS. A description of transportation of infectious materials is included in Section 3.11.9 of the NBAF EIS.

Comment No: 3                      Issue Code: 19.3

DHS notes the commentor's concern. 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. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies, that would address special consideration populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. No disproportionately high and adverse effects to environmental or human resources are evident with any of the alternatives.

Askey, Jennifer

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KSD020



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

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

Name: Jennifer Askey

Title: Asst. Prof / KSU

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: KS Zip Code: \_\_\_\_\_

Comments: I am ADAMANTLY opposed to the constructed in Manhattan. My reasons are:

1) The GAO has issued a report noting that NO entity can guarantee the safety of a BSF4 facility dealing w/ large animals + their pathogens. This risk IS UNDER NO CIRCUMSTANCES worth taking in a community w/a large student (=mobile; =international) population AND with such proximity to the major beef market in the country.

2) The pathogen leaks in Surrey, England were traced to human error. All the technology in the world can't protect us from that.

(Continued on back for your convenience)

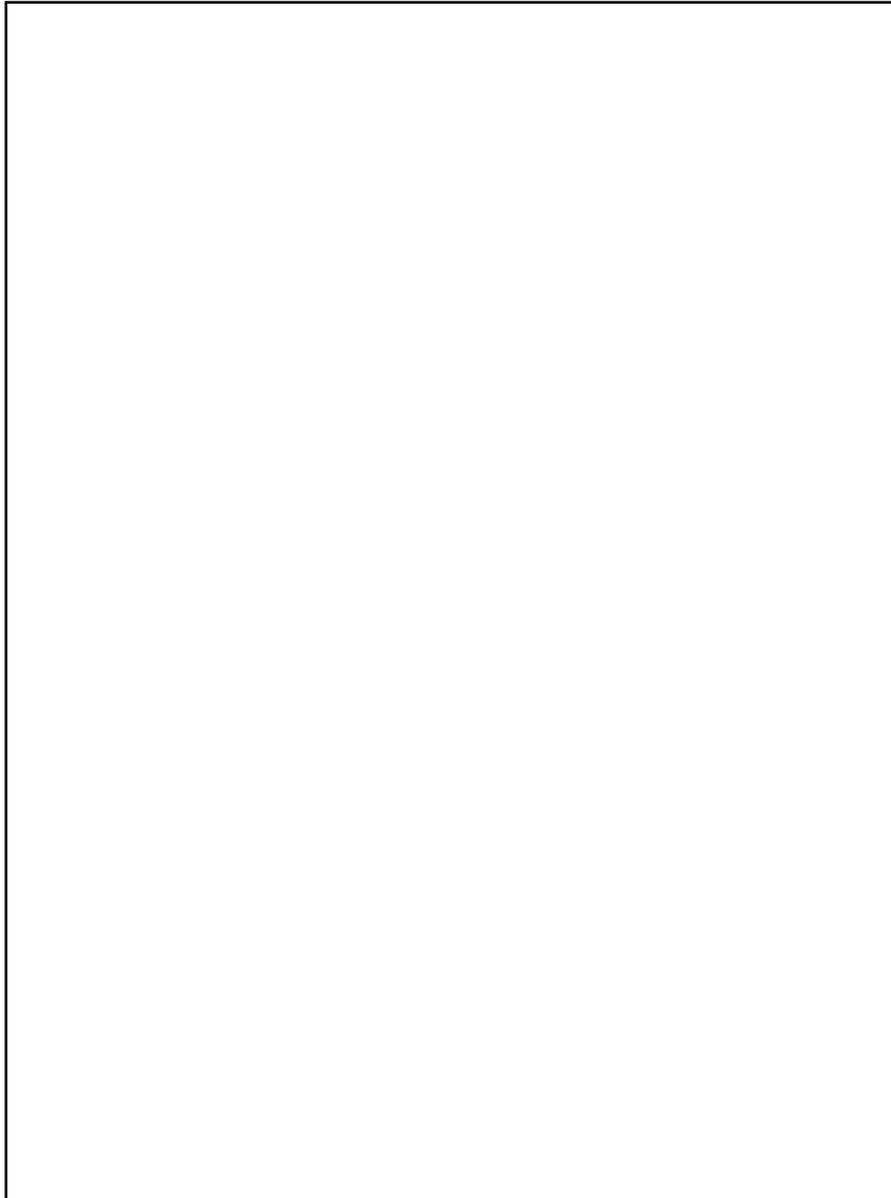
Comment No: 1      Issue Code: 25.4  
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2      Issue Code: 5.0  
DHS notes the commentor's opposition to the Manhattan Campus Site and reference to the U.S. Government Accountability Office report (May 2008) as justification. 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 it to be safely operated on the mainland. 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.

Comment No: 3      Issue Code: 21.4  
Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Comment No: 4      Issue Code: 15.4  
DHS notes the commentor's concern. The potential economic effects including those from an accidental release are discussed in Section 3.10.9 and Appendix D. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as \$4.2 billion until the U.S. was declared foreign animal disease free.

Comment No: 5      Issue Code: 21.4  
DHS notes the commentor's concern regarding the potential consequences from a NBAF accident as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Training and inherent biocontainment safeguards reduce the likelihood of a release. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents),



natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. Oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

Askey, Jennifer

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KSD020

5/5.0

1 cont. 25.4

3) I feel like the entities pushing for Kansas to be the site, as well as the EIS, fail to take into account the real risks of putting this facility in the middle of the country. Manhattan's proximity to agriculture + ranching makes this so risky.

I don't want this here, in my community.

**THANK YOU FOR YOUR COMMENTS**

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

**U.S. MAIL**

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

**TOLL-FREE FAX**

1-866-508-NBAF (6223)

Comment No: 6

Issue Code: 5.0

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

Austin, Marietheresa

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AUG-15-2008 05:37P FROM:WILLIAM AUSTIN (631) 477 0617 TO:18565086223 P.1

FD0017

From: Marietheresa Austin  
To: James V. Johnson - DHS-Science+Technology  
Directorate  
Re: Public Comment - Upgrading of PLADC to BSL-4

Austin, Marietheresa

Page 2 of 5

AUG-15-2008 05:37F FROM:WILLIAM AUSTIN

(631) 477 0617

TO:189E908E223

P.2

FD0017

Aug. 15, 2008

Dear Mr. Johnson,

I attended both presentations regarding the upgrading of Plum Island to a BSL-4. This letter is based on information that I gleaned from these meetings and the fact that I have lived in [REDACTED], N.Y. for eight years.

As I understand the situation, if PIAOC is upgraded to a level 4 lab, dangerous pathogens which can be transmitted from animals to humans will be tested and studied. This type of research is very necessary, if not one to protect the food supply of our population. However, the safety and health of our population should be the first priority of any such facility. Therefore, I believe that a level 4 lab does not belong in a populated and geographically fragile area, such as the North Fork of Long Island.

This type of testing and scientific research belongs, as close as possible, to the source of its greatest need, that is, ranch and farming communities. Many of these farms and ranches are located in sparsely populated

Comment No: 1

Issue Code: 25.1

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

Comment No: 2

Issue Code: 5.0

DHS notes the commentor's support for the NBAF to be located in close proximity to the farming community.

1|25.1

2|5.0

Austin, Marietheresa

Page 3 of 5

AUG-15-2008 05:35F FROM:WILLIAM AUSTIN

(631) 477 0617

TO:18965086223

P.3

FD0017

2

Areas of our country. Untested samples and pathogens should not have to travel long distances to a lab. In order to reach Plum Island, these pathogens would have to travel through our metropolitan airports (JFK, LaGuardia, Newark) and very populated roadways (LIE, Sunrise Hwy). This just increases the risk to a very large population. Another piece of disturbing information, that I learned, was that untested samples are transported to Plum Island on FedEx Trucks, along with packages that are delivered to our local citizens front doors. This procedure exposes our citizens to cross contamination in the event of a breach.

There are many security issues that come to light about the suitability of Plum Island for a BSL-4. Plum Island is located very close to a nuclear power plant. It has not been designated as a No Fly Zone. It does not have a distance perimeter limiting access to its shores by fishermen and pleasure boaters.

Recently many homeowners, (myself included) were red lined by insurance companies

Comment No: 3

Issue Code: 17.1

DHS notes the commentor's concerns regarding transportation of pathogens. A discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS, and Section 3.14, Health and Safety, includes an analysis of accidental releases during transportation. A discussion of the existing road conditions and potential effects to traffic and transportation from the Plum Island Site Alternative as provided in Section 3.11.6 of the NBAF EIS.

Comment No: 4

Issue Code: 8.1

DHS notes the commentor's statement. 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.

3|17.0

4|21.1

Austin, Marietheresa

Page 4 of 5

AUG-15-2008 05:48F FROM: WILLIAM AUSTIN

1621: 477 0617

TO: 19665096223

P.4

FD0017

3

5| 21.1 and either dropped or forced to take out  
higher police for hurricane risk.  
In the event of a severe storm, the ferry  
to Plum Island does not run. The  
causeway between [REDACTED] and  
[REDACTED] could become impassable and there  
6| 17.1 would be no means of evacuation for our  
residents - We were told that in the  
event of an emergency our county and town  
police ([REDACTED]) would be part of PIADC  
emergency plan. Our nearest Suffolk County  
Police are located in the town of [REDACTED]  
(miles away). Our [REDACTED] Police sometimes  
has 3 officers on duty (at night). (I've told  
7| 27.0 ~~been told~~ in the past.) Recently, a woman  
suspected of terrorism was arrested in the  
Middle East. She is a scientist who had  
been in New York and, had in her  
possession maps of Plum Island.  
The facility at PIADC is very old.  
It needs a lot of updating. We were told  
that the wastewater treatment had  
8| 18.1 been compromised for a "few periods of time".  
They called these exceedments. This water  
is dumped into our Long Island Sound.

Comment No: 5

Issue Code: 21.1

DHS notes the commenter's concern regarding hurricane risk to the NBAF. Chapter 3 Sections 3.4 and 3.14.3.2 address NBAF design criteria and accident scenarios associated with weather-related events such as high winds, tornadoes and hurricanes. 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, tornadoes, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 6

Issue Code: 17.0

DHS notes the commenter's concern for evacuation routes in the event a strong storm makes the causeway between East Marion and Orient impassable during an emergency event associated with the NBAF. A site-specific emergency response plan will be developed and coordinated with the local Emergency Management Plan regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF.

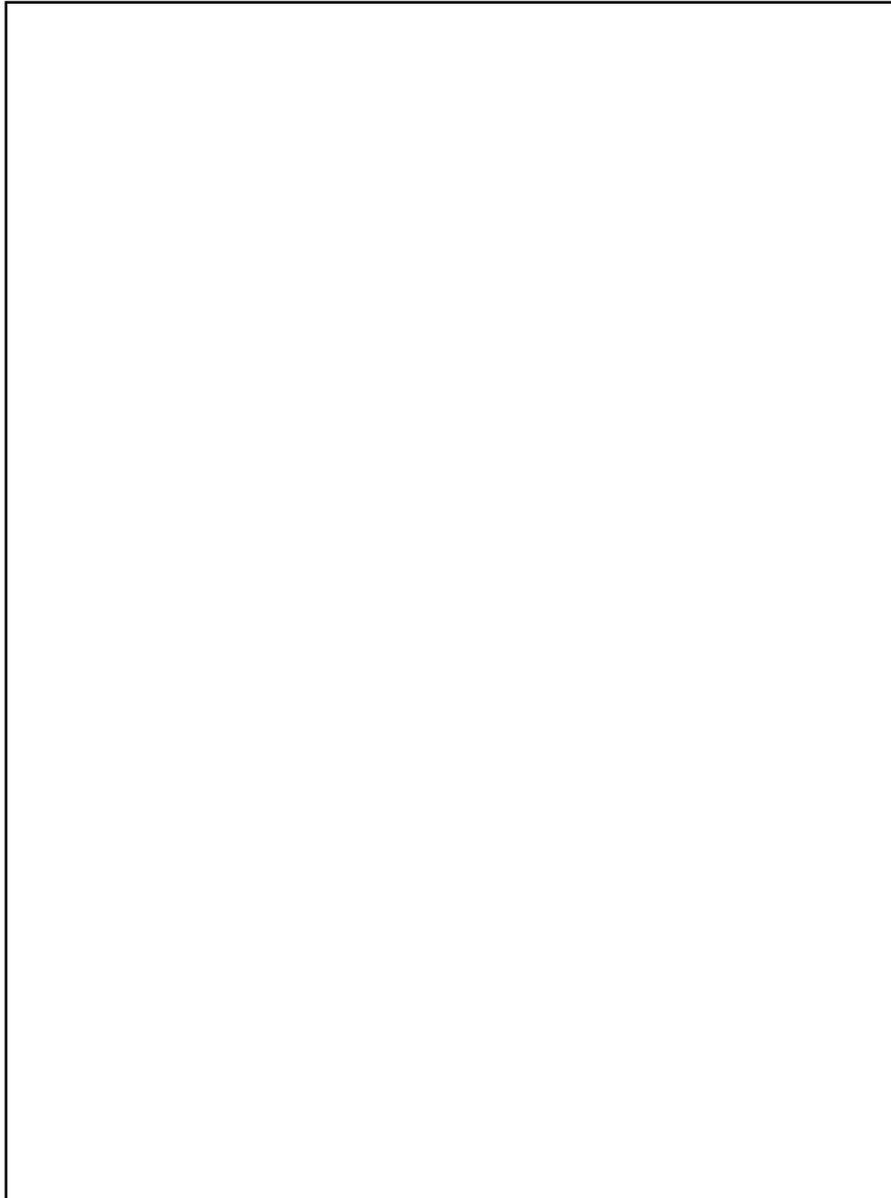
Comment No: 7

Issue Code: 27.0

DHS notes the information provided by the commenter. 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 would be 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-biocontainment 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: 8

Issue Code: 18.1



DHS notes the commentor's concern regarding the discharge of wastewater to the Long Island Sound exceeding State Pollutant Discharge Elimination System (SPDES) permit limits. As discussed in Section 3.13.7.3 of the NBAF EIS, projected peak loads do not fall within the Plum Island site's current permitted capacity. Options to address this issue include constructing and permitting a new wastewater treatment plant, modifying and expanding the existing plant, or adding pretreatment holding tanks that would allow peak loads to be averaged and fall within current permitted capacity.

Austin, Marietheresa

Page 5 of 5

AUG-15-2008 05:41F FROM:WILLIAM AUSTIN

(631) 477 0617

TO:18855086222

P.5

FD0017 4

9| 12.1 We fish commercially and recreationally in the Long  
Island Sound. We swim and boat in this water.  
10| 9.1 Our residents in [REDACTED] do not have access to  
public water, which is tested regularly. They drink  
well water. The air emissions from the stacks  
11| 15.1 for Plum Island were last tested in 2004. Our  
local hospital is woefully inadequate and  
can not handle serious emergencies.

We have an epidemic of Lyme Disease  
in the area. We have an exploding deer population  
which is out of control. We were told that  
deer are called, if they swim from the  
mainland to Plum Island. I hope they  
have called all of them! There are also  
legacy issues, such as, a large oil spill  
which has yet to be cleaned up.

12| 15.1 Although it was pointed out the PIADC  
adds to our local economy, we would  
suffer billions of dollars in economic loss due  
to the devaluation of our real estate,  
tourism and fishing industries, and our health  
issues in the event of a breach.

Respectfully submitted,

Marietheresa Austin

[REDACTED], NY, [REDACTED]

Comment No: 9 Issue Code: 12.1

DHS notes the commentor's concerns regarding potable water on Long Island. As described in Section 3.7.2.1.3, Plum Gut strait separates the Plum Island freshwater aquifer from the Long Island aquifer(s).

Comment No: 10 Issue Code: 9.1

DHS notes the commentor's observation regarding the evaluated stack testing data. The 2004 stack testing results were used to develop a facility emissions evaluation for the 2002-2005 operational period, as discussed in the NBAF EIS Section 3.4.2.1.2. If the Plum Island Site alternative is selected and following final design, a complete emission inventory would be developed, a general conformity analysis made, and refined modeling executed as to establish compliance with the NAAQS.

Comment No: 11 Issue Code: 8.1

DHS notes the commentor's concern. DHS will offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans will also include training for local law enforcement, health care, and fire and rescue personnel.

Comment No: 12 Issue Code: 15.1

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.

Auten, Suzy

Page 1 of 1

WD0606

**From:** Suzy Auten [REDACTED]  
**Sent:** Saturday, August 23, 2008 5:09 PM  
**To:** NBAFProgramManager  
**Subject:** Letter of Support

To Whom It May Concern:

I am a resident of [REDACTED] Kansas, who strongly supports our community's efforts to build the NBAF here. We have a tremendously dedicated and talented group of faculty researchers who are ready to make this facility a reality. Our university, community and regional partners are committed to the project as well. The dedication to hard work, high ethical standards and excellence in research abilities of the K-State community make this the best place for such an important facility. I hope that you will not give much credence to the last-minute efforts of about 50 people (from a community with nearly 50,000 residents). That they have been successful in getting any signatures at all on their petitions has more to do with the misinformation they are providing than it has to do with any true opposition to NBAF coming here. Most of our citizens want the NBAF here because they trust this is the best place for this research to occur and they recognize that our pool of talented faculty are more than capable of carrying out the important mission the NBAF must carry out.

Thank you for recognizing the tremendous benefits of placing the NBAF in Manhattan. It is a decision that will pay off for the Department of Homeland Security, the nation and the world who are all depending on the solutions our researchers will discover when doing their work in this state-of-the-art facility.

Sincerely,

Suzy Auten

[REDACTED] KS [REDACTED]

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

Comment No: 1      Issue Code: 24.4

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

Comment No: 2      Issue Code: 8.4

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

Comment No: 3      Issue Code: 1.0

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

Auwarter, Clare

Page 1 of 1

WD0784

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**From:** [REDACTED]  
**Sent:** Monday, August 25, 2008 4:36 PM  
**To:** NBAFProgramManager  
**Subject:** Opposed to NBAF in Athens, GA

1| 25.2 | I live in [REDACTED] which neighbors [REDACTED] County, and I would like to go on record for opposing locating the lab in Athens.

Clare Auwarter  
Librarian

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

Ayers, Charles

Page 1 of 1

WD0058

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**From:** jeremy ayers [REDACTED]  
**Sent:** Sunday, July 13, 2008 6:41 PM  
**To:** NBAFProgramManager  
**Subject:** new nbaf facility

1|25.2 Dear Sirs, I'm writing to express my opposition to putting a nbaf facility in athens ga. The vast majority of our community in [REDACTED] does not want such a facility in our town. Please keep this facility off the mainland entirely.  
Thanks for you time and attention, Jeremy Ayers, [REDACTED] Ga.

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

Ayers, Marilyn

Page 1 of 1

WD0347

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**From:** Marilyn [REDACTED]  
**Sent:** Tuesday, August 19, 2008 9:36 AM  
**To:** NBAFProgramManager  
**Subject:** I don't want NBAF in Athens, Georgia

1|25.2 | Another citizen (along with 5 members of my family) of [REDACTED] Georgia who is opposed to NBAF.

Thank you for removing Athens, Georgia from your short list of possible sights.

Marilyn S. Ayers

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

**Bachamp, P.E., Mark**

**Page 1 of 1**

WD0686

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**From:** Mark Bachamp [MBachamp@schultzconst.com]  
**Sent:** Monday, August 25, 2008 9:35 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF - Manhattan KS

1|24.4;  
2|21.4

I am writing in support of the National Bio and Agro-defense Facility in Manhattan, Kansas. We moved to Manhattan in 1989 and raised three children two of which are attending KSU and one left in high school. The safety of this facility does not raise concerns for us because we do feel the safety protocol will be of high importance. I see all but positive from this facility being located in Manhattan.

Mark Bachamp



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

Comment No: 2                      Issue Code: 21.4  
DHS notes the commentor's statement.

**Bailey, Lafe**

**Page 1 of 2**

WD0371

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**From:** Lafe Bailey [l-bailey@wenger.com]  
**Sent:** Tuesday, August 19, 2008 4:27 PM  
**To:** NBAFProgramManager  
**Subject:** Kansas location for the National Bio and Agro-Defense facility  
**Attachments:** National Bio and Agro Defense facility.pdf

Thank you for your consideration.

Kind regards,

Lafe Bailey

## Bailey, Life

## Page 2 of 2

Wenger Plant and Corporate Offices  
714 Main Street  
Sabetha, KS 66534-0130 U.S.A.

Telephone: (785) 284-2133  
Telefax: (785) 284-3771  
www.wenger.com

August 19, 2008

To Whom It May Concern:

1|24.4 | I appreciate the opportunity to lend our corporate support to the State of Kansas being selected as the site for the National Bio and Agro-Defense Facility. Our firm is the world's leading supplier of extrusion processing equipment for the human food and animal feed industries. Over 60% of our sales are exported and the presence of our staff worldwide supports the fact that Kansas, and her Universities, Institutes and Businesses are well known and highly regarded throughout the world.

Kansas is unique among other states in regard not only to our focus on all aspects of food and feed production, but is also unique in our proximity to the Kansas City Animal Health Corridor, Kansas City Life Sciences Institute, Midwest Research Institute, Stowers Institute for Medical Research and the University of Kansas Medical Center.

Kansas State University, American Institute of Baking, and the many food and feed focused companies like our own nicely round out the capabilities that Kansas has to offer.

1 cont. | I applaud your efforts and foresight in selecting the site for this vital component to our national  
24.4 | security.

Kind regards,



Life Bailey  
Vice President  
Wenger Manufacturing, Inc.  
714 Main Street  
Sabetha, KS  
66534



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Extrusion processing systems worldwide

Comment No: 1 Issue Code: 24.4

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

## Bailie, Wayne

## Page 1 of 2

WD0145

**From:** Wayne E. Bailie [REDACTED]  
**Sent:** Friday, August 01, 2008 12:40 PM  
**To:** NBAFProgramManager  
**Subject:** NABF - Manhattan, Kansas

To whom it may concern,

Comments to The Department of Homeland Security in regard to locating the National Bio and Agro-Defense Facility on the campus of Kansas State University, Manhattan, Kansas

**Name:**

Wayne E. Bailie, DVM, PhD,  
 Diplomat American College of Veterinary Microbiologists  
 Emeritus Professor of Microbiology  
 College of Veterinary Medicine  
 [REDACTED]

**Education:**

[REDACTED] Kansas 1951 – 1957 – Degrees, B.S and D.V.M.  
 [REDACTED] Kansas 1964-1969 – Degree, Ph.D.

**Experience:**

General Practice of Veterinary Medicine, Iowa and Nebraska - 1957-1964  
 Graduate School at [REDACTED] - 1964- 1969  
 Associate Professor of Veterinary Medicine – [REDACTED] 1969-1970  
 Associate Professor of Veterinary Medicine – [REDACTED] Nigeria- 1970-1972  
 Associate Professor and Professor – [REDACTED] – 1972 - 1994  
 Professor – Ross University – [REDACTED] West Indies - 1996

1|24.4 I was in attendance at the afternoon Presentation held in the Kansas State University Student Union on July 31, 2008 and had intended to make comments at that time, but other obligations required me to leave before I was able to be called upon. It was my intent to speak in support of locating this laboratory on the Kansas State University campus in Manhattan, Kansas.

Of the experts in the area of Veterinary Microbiology and Infectious Diseases in the room, I believe that I would have be counted as one of them because of my education, training and experience. I taught Veterinary Microbiology to some 2500 Veterinary Students during my academic career and supervised conduction of microbiologic diagnostic examinations on specimens from diseased animals at [REDACTED] [REDACTED] for 30 years. During my entire experience as a Veterinarian and a Diagnostician, I have observed and been involved in the diagnosis of domestic animals who had two of the infectious diseases that are intended to be studied at

Comment No: 1

Issue Code: 24.4

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

Bailie, Wayne

Page 2 of 2

WD0145

1 cont.  
24.4

NBAF [Classical Swine Fever (Hog Cholera) and Contagious Bovine Pleuropneumonia.] in addition to other diseases too numerous to enumerate.

Consequently, I feel that I am especially qualified to comment on why this laboratory should be located in Manhattan, Kansas.

Manhattan, Kansas has a unique location not shared by any of the other proposed sites.

**First**, the proposed site is immediately adjacent to the Bio-security Research Institute in Pat Roberts Hall which is a BSL 3 bio-security research institute where research is ongoing at present on infectious diseases of domestic animals and plants. Scientists from this laboratory might well work in co-operation with scientists at NBAF.

**Second**, the proposed site is very close to the Kansas State University College of Veterinary Medicine where teaching, research and diagnostics are a continual process. I am sure that many of the well qualified scientists at the college would welcome the opportunity to be able to collaborate with scientists from NBAF. Many minds are better than one.

**Third**, ██████████ Kansas is a wonderful city in which to live and raise families. My wife and I have lived and raised our family here for 36 years and retired here following my career at the ██████████ College of Veterinary Medicine. Being in a University city offers many advantages for entertainment from sports to Opera and other types of shows that are presented at our McCain Auditorium.

2|21.4

**My final** comments are related to the possibility of a release of infectious material into the environment. Anything is a possibility in this world. However, with the construction of the proposed site and secure laboratories that are planned, it is highly unlikely that such a release ever could happen. If it should happen, this location offers a large number and variety of scientists who are well qualified to aid in the control of a possible disease outbreak. There is a risk, but in my opinion, little is gained without some degree of risk.

1 cont.  
24.4

I am highly supportive that Manhattan, Kansas be selected for establishment of the new National Bio and Agro-Defense Facility.

Thank you very much for listening.

Comment No: 2

Issue Code: 21.4

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

**Baker, DVM, William**

**Page 1 of 1**

WD0130

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**From:** Bill Baker [REDACTED]  
**Sent:** Wednesday, July 30, 2008 2:39 AM  
**To:** NBAFProgramManager  
**Cc:** [REDACTED]  
**Subject:** plum island lab site

To whom it may concern:

**NBAF Environmental Impact Statement**

7-29-08

To whom it may concern;

1/25.0;  
2/24.1 I am a veterinarian in [REDACTED] Nebraska. I am very concerned about the proposal to relocate the Plum Island Lab to a mainland location. Maintaining the lab in an area geographically isolated from large agricultural areas is the way to go. We all know that mistakes and security breeches do happen. Please support keeping the NBAF at Plum Island. The United States cannot afford to compromise it s agricultural base.

Sincerely,

William D. Baker DVM

Comment No: 1                      Issue Code: 25.0

DHS notes the commentor's concern. Section 3.14 evaluates the potential effects to health and safety to all sites including those on the mainland. The evaluation concludes a pathogen release at the Plum Island Site would be slightly less likely to result in adverse effects than the mainland sites.

Comment No: 2                      Issue Code: 24.1

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