I'm calling to express my opposition to placing the NBAF on solid land and not having it on an island in accordance with the recommendation of the Government Accountability Office Study. Absolute perfect containment never was and never will be possible. Offshore the deadly toxins have dissipated over the ocean not hurting people or animals. Therefore, I oppose bringing the NBAF to the Kansas State University campus. I do not represent an organization. My name is Glenna Burckel. Many people I’ve talked to have the same view. Whether or not they will have the energy and confidence of making a difference to get in contact with you, I do not know. Thank you.
DHS notes the commentor's support for the Manhattan Campus Site Alternative.
DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

Comment No: 1 Issue Code: 24.5

I am so delighted that Flora, Mississippi is being considered for the Bio and Agro-Defense Facility (NSAF). We need this in our state. It will provide good jobs for our young people and will give us a more exciting technology. We have excellent education facilities in Mississippi and this would keep our bright young people, and attract others to our state.

Sincerely,

Gina Burgess
CEO, Executive Director

Fax: 1-866-508-NSAF (6225)
Emailed to: info@mississippi.org and xstate@mississippi.org
DHS notes the commentor's support for the Manhattan Campus Site Alternative.
August 22, 2008

Yes. My name is Stuart Burkhead. I live in Kansas and I support the NBAF in Kansas.

Thank you very much.

DHS notes the commentor's support for the Manhattan Campus Site Alternative.
August 24, 2008

Good afternoon. I’m calling from [redacted] Georgia. My name is Carla Buss and I am opposed to NBAF coming to Athens.

My main concern is where the water is going to come from to operate such a facility. And I’m also concerned about safety issues as the CDC has recently had several leaks that had to be taped up with duct tape just as an example.

I’m concerned about this. I don’t think it’s good for Athens and I am strongly opposed to it.

Thank you for listening to my comments.
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative in favor of the Plum Island Site Alternative.
August 25, 2008

To: NBAF Program Manager

RE: Support for NBAF Placement in Manhattan

The Manhattan Area Chamber of Commerce has gone on record from Day One as supporting NBAF for our country and for our community. My point for all to consider is what can our community do for NBAF? We simply have the capability to provide leading researchers and an existing building with the BRI Level 3 Lab facility already in place.

Our community has clearly demonstrated through the years that it can rise to any occasion and provide leadership to accomplish some wonderful goals. Today, our community and this region of Kansas has effectively responded to the large expansion of Fort Riley making soldiers and their families feel welcome by adding needed infrastructure in schools, housing, roads, health care, child care and etc.

Our community has demonstrated and will respond to make sure that both NBAF and the community will work together to make this the best possible location to continue to fight future terror threats on our food supply. There is no more open and welcoming state, university or community in this country that can show from the past it’s extraordinary capability to lead in the future.

If we can help or provide any additional information please do not hesitate in contacting our office.

Sincerely,

Lyle Butler

Lyle A. Butler
President/CEO
Manhattan Area Chamber of Commerce
501 Poyntz Avenue
Manhattan, KS 66502-6005
785-776-8829
email: lyle@manhattan.org
website: www.manhattan.org
CITY OF MADISON

TO: JAMES V. LINDSEY, US DEPT OF HOUSING SECURITY
FAX #: 1-866-508-6323

FROM: MAYOR MARY HAWKINS BUTLER
FAX #: (601) 853-4766 Phone #: (601) 856-7116

SUBJECT: LETTER OF SUPPORT FOR NEAR BY AREA PROPOSED FOR USE IN MISSISSIPPI

 COMMENTS:


If you do not receive the total number of pages indicated, please call our office at (601)856-7116. Thank you.
Butler, Mary Hawkins

Page 2 of 2

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

Mary Hawkins Butler
Mayor

September 24, 2007

This letter is written in support of Homeland Security choosing Flora in
Madison County, Mississippi as the site for a new National Bio and Agro-
Defense Facility (NBAD).

The City of Madison considers Flora a sister city with common goals for
quality of life. Flora has always had a hometown feeling with good people
who are proud of their community. The city, dedicated to high standards and
careful planning, is poised for growth.

At the Scoping Meeting held in Flora, Madison County School Superintendent
Mike Kent placed in the record the quality of schools based on student
achievement and test scores. The high standard for education in Madison
County's public and private schools is an incentive toward attracting families
who require excellence in education.

The metropolitan and rural areas of Madison County provide a broad range of
activities. In less than three hours one can dine in New Orleans, shop in
Mobile or Memphis, or vacation on the Gulf Coast.

The attached Resolution adopted by the Board of Aldermen of the City of
Madison attests to the broad support the administration of the city lends to the
choice of Flora, Mississippi as the site for a new NBAD.

Respectfully,

Mary Hawkins Butler
Mayor of Madison
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: 24.1
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.
DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

Bynum, James

August 20, 2008

Sir,

I am writing to express my full support for the Natural Bio-Lab project that is being conducted by the Department of Homeland Security in Mississippi. As a resident of [redacted], I believe this project will be very unique and will provide very high value service to the U.S. This area has a great quality of life, and strong educational institutions across the state. I hope this new facility can be the best in the world.

I will be proud to have the NBAF facility here in Mississippi County, MS.

Sincerely,

James L. Bynum
July 28, 2008

Hi,

My name is Maureen Cacioppo and I’m calling to say that I oppose the Plum Island BSL-4.
Calhoun, Myron

Page 1 of 1

August 25, 2008

This is Myron Calhoun. I live in Manhattan just outside of Manhattan, Kansas. I’m a retired faculty member at Kansas State University. I’m also a retired small-time farmer and rancher.

I am against putting NBAF in Manhattan or in Riley County, Kansas for several reasons, but I’ll only list four right now.

First one – it does not belong in a ranching state, and ranching is a major industry in this state. If something gets out, it’ll have major repercussions for us.

Second – it does not belong in a town, and the proposed site is on a university campus in the town of Manhattan, within a half mile of a major retirement center, within a mile of almost every public and private school that we have. It’s just in the wrong place.

Three – it does not belong in tornado alley. For example, an EF3 tornado barely missed the proposed site just this year. So, it really needs to be built in someplace where things like this don’t happen.

And I can’t even remember my fourth item right now, but I really do not think the NBAF needs to be built in Manhattan, Kansas, even though I understand that we need NBAF, and NBAFs are good, but this is the wrong place for it.

Thank you.

Good bye.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor’s opposition to the Manhattan Campus Site Alternative. As described in Section 2.3.1, 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 semi-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 2 Issue Code: 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 of the NBAF EIS. 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. The risk of a pathogen release from the proposed NBAF at each of the proposed sites was evaluated in Section 3.14 of the NBAF EIS and was determined to be low for all sites.

Comment No: 3 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, 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.
Calhoun, Nancy

Page 1 of 1

August 25, 2008

1) 26.4 This is Nancy Calhoun. I live in [redacted] Kansas. I am a retired staff member of Kansas State University. I am reluctant to see the NBAF in Manhattan for the following reasons.

We are in the center of the beef raising area of the United States and to bring in foot and mouth disease to be researched in this area, there is no hundred percent guarantee that there will not be an accidental release because of the personnel that go in and out of the building. And it would be a severe impact to have that released in this area.

2) 21.4 We are in tornado alley. We have recently seen the damage that can be done. I do not know that there are buildings built that can fully withstand the power of a tornado.

3) 21.4 The building proposed location is very close to a senior center complex where a lot of senior people live, very close to this area, and it would be a population that would be highly susceptible to any zoonotic release from the building.

Those are some of the reasons that I am reluctant to see the NBAF located in Manhattan, Kansas.

Thank you.

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

Comment No: 2 Issue Code: 21.4
DHS notes the commentor's concern regarding an accident. Section 3.14, states that the specific objective of the hazard identification 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 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 operations of the NBAF then site specific protocols 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 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.

Comment No: 3 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, 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: 4 Issue Code: 20.4
DHS notes the commentor's concern. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the EIS. The risks were determined to be low for all site alternatives, but DHS acknowledges that there are additional risks for the elderly population. 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 the populations residing in the area.
To whom it may concern,

I am writing on behalf of RIM Development and Professional Services of Kansas. As business owners in the Manhattan area we want to show our support of building the National Bio and Agro-Defense Facility in Manhattan, KS. Thank you for your consideration.

McKenzie Callahan
Professional Services of Kansas and RIM Development
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2   Issue Code: 2.0
DHS notes the commentor's concern. Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 23 public meetings have been held in the vicinity of NBAF site alternatives and in Washington, D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered. DHS has also provided fact sheets, reports, exhibits, and a Web page (http://www.dhs.gov/nbaf). Additionally, various means of communication (mail, tollfree telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance.

Comment No: 3   Issue Code: 25.2
DHS notes the commentor's statement.
From: Jason Cantarella
Sent: Wednesday, August 20, 2008 1:45 PM
To: NBAFProgramManager
Subject: Many in Athens support NBAF

Hi NBAF program manager,

I am writing to let you know that there are plenty of serious people in Athens, Georgia who strongly support locating NBAF in our town. While a few heretics have been vocal in their opposition, the sense of the town is for science and for development. We welcome another valuable addition to our scientific community.

Best wishes,

Jason Cantarella.

--

Jason Cantarella
This is Dale Cantrell. I’m a member of the Grand Lodge of Masons in Kansas and I support NBAF in Kansas.

DHS notes the commentor’s support for the Manhattan Campus Site Alternative.
DHS notes the commentor’s concerns regarding her family’s and the local communities safety. 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. Appendix B to the EIS describes biocontainment lapses and laboratory-acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Medical facilities are discussed for the Umstead Research Farm Site in Section 3.10.7. 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 consider the special needs, diversity and density of 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.

The effects of siting the NBAF on socioeconomic conditions, including housing, are discussed in Section 3.10 of the NBAF EIS. As discussed for the Umstead Research Farm Site in Section 3.10.7.3, the housing market would be able to meet the increase in housing demand (326 employees in total), relative to the estimated growth of the existing population between 2007 and 2012 (188,278). It is possible that with the relocation of highly skilled workers to the immediate area, property values could increase due to an increase in demand, and there is no empirical evidence that a facility such as the NBAF would reduce property values in the study area. Therefore, the overall effect of the NBAF on housing market conditions would be negligible.

DHS notes the commentor’s opposition to the Umstead Research Farm Site Alternative.
Carow, Mollie

Page 1 of 1

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

Comment No: 2                      Issue Code: 21.0
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.

Comment No: 3                      Issue Code: 24.1
DHS notes the commentor’s opposition to the five mainland site alternatives.

From: [redacted]
Sent: Tuesday, July 15, 2008 9:25 AM
To: [redacted]@GA
Subject: [redacted]

DHS—[redacted] from the proposed NBAF site in ATHENS, GA.

DO NOT LOCATE HERE.

I am a mother, (of a PhD in Micro - Biology and Immunology, and of a PhD in Mechanical Engineering), grandmother, teacher (mathematics), retired non-profit executive and community volunteer.

Whatever the motives of UGA and our Athens/Clarke government... pretext? more 5 down the road? and

Whatever the logic of those who decide, there is NO WAY to say there is no risk. There is ALWAYS A RISK, ...and it is HUMAN ERROR, an accident. Commons sense says "keep the lab on the island". THAT IS BEST FOR OUR CITIZENS!

MOLLIE CAROW
From: Phillip Carpenter
Sent: Friday, August 22, 2008 6:15 PM
To: NBAP/Program/Manager
Subject: Flora, ms

To whom it may concern,

As you can see from my contact information below, I am a commercial realtor in Jackson, MS so I obviously have selfish reasons for wanting the bio defense facility to locate in Flora, MS.

However, on a personal note, I have lived in Mississippi less than half my life. Since moving to Mississippi I can tell you that I have witnessed a “can do” attitude like none elsewhere. If the facility were to locate in Flora I can assure you that you would have the full support of Hinds, Madison County, the state and surrounding communities. There is a real sense of “team effort” in this area. The employees who work at the facility will be warmly received in this community and will never want to leave.

As a realtor, location plays an important role in determining where my clients choose to place their businesses so I understand the importance of location and how it relates to real estate and business decisions. I am assuming that, since this facility falls under the auspices of Homeland Security, that security is of utmost importance. As far as the Flora location relates to security, the federal government made the decision during World War II to store ammunition in Flora because of its attributes to security. The variables surrounding the decision to store ammunition in Flora during World War II have to be similar to the security issues related to the location of the bio defense facility today. For this reason and others, I would hope that the Flora site would be tops on the list.

Thank you for taking the time to read this email. I trust that the right decision will be made for the sake of our nation and for all of mankind.

With Kindest Regards,
Phillip

Phillip Carpenter SIDR, CDIM

Note: If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you.
Chapter 2 - Comment Documents

Carrea, Tammy

Page 1 of 2

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: 12.3
DHS notes the commentor’s concerns regarding the risk of a potential accident or terrorist event. 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 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. 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. Appendix B to the NBAF EIS describes biocontainment lapses and laboratory acquired infections in the United States and world-wide. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of 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. Section 3.14 of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as

Comment No: 3 Issue Code: 5.3
DHS notes the commentor’s concerns regarding the risk of a potential accident or terrorist event. 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 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. 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. Appendix B to the NBAF EIS describes biocontainment lapses and laboratory acquired infections in the United States and world-wide. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of 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. Section 3.14 of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as
For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The TRA is “For Official Use Only” and is not available for public review. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies.

Comment No: 6 Issue Code: 4.3
DHS notes the commentor's concerns regarding the site selection process, which is described in Section 2.3.1 of the NBAF EIS. Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 23 public meetings have been held in the vicinity of NBAF site alternatives and in Washington D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered. DHS has also provided fact sheets, reports, exhibits, and a Web page (http://www.dhs.gov/nbaf). Additionally, various means of communication (mail, toll-free telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance.
responsible for delivering it to the intended recipient, you are hereby
notified that any disclosure, copying, distribution, or use of any of
the information contained in or attached to this transmission is
STRICTLY PROHIBITED. If you have received this transmission in error,
please immediately notify Sicel Technologies, Inc. by e-mail or by
telephone at (919) 465-2236, and destroy the original transmission and
its attachments without reading them or saving them to disk. Thank you.
DHS notes the commentor’s concerns regarding the lack of site-specific details in the accident evaluation. 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. 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 equipment and safety protocols for local emergency response providers.

Comment No: 2 Issue Code: 8.3
DHS notes the commentor’s concern regarding the infrastructure improvements and associated costs required for the NBAF operation at the Umstead Research Farm site. Section 3.3.7 and Section 3.11.7 of the NBAF EIS includes an assessment of the current utility and transportation infrastructure at the Umstead Research Farm Site, the potential impact and effects from construction and operation of the NBAF, and the planned utility and transportation improvements to meet the operational requirements of the NBAF. Information on the utility and transportation improvement cost and the scope of the cost analysis performed is summarized in Section 2.5 of the NBAF EIS. Financing mechanisms for identified utility and transportation improvements or upgrades are beyond the scope of the NBAF EIS.

Comment No: 3 Issue Code: 15.3
Please refer to the response in Comment No. 2.

Comment No: 4 Issue Code: 21.3
DHS notes the commentor’s concern that site specific operational, safety, security and emergency response plans are not included in the NBAF EIS. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ’s regulations for implementing NEPA (40 CFR 1500 et seq.). The analysis conducted in the NBAF EIS was based on conceptual design plans posted on the DHS website. More detailed design plans would be developed as the project moves into the final design phase. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific operational, safety, security and emergency protocols and plans would be developed that would consider the diversity and density of human, livestock and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. DHS also notes commentor’s concern that responders may not be properly trained or properly equipped with adequate personal protective equipment (PPE). Section 2.2.2 of the NBAF EIS
provides information on the general types of Standard Operating Procedures (SOP) that will be prepared subsequent to the NBAF Record of Decision. These SOPs will include site-specific operation and maintenance SOPs, as well as release mitigation procedures and emergency response plans. The emergency response plans would be developed in coordination with local emergency response agencies and would include training to ensure adequate protection of responders.

In addition, 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. The TRA and security actions that would be implemented, based on TRA recommendations, are designated as For Official Use Only and not available to the public for security reasons. The TRA addresses emergency response planning and pre-planning/coordination with local emergency response agencies as recommended mitigation measures.

Comment No: 5  Issue Code: 23.0
DHS notes the commentor’s statement that the potential threats of particular pathogens to be studied at the NBAF are not provided in the NBAF EIS. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The representative pathogens used in the NBAF risk assessments detailed in Section 3.14 and Appendix E of the NBAF EIS, were Foot and Mouth Disease virus (FMDV), Rift Valley Fever virus (RVFV) and Nipah virus. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.8 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record
of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 6 Issue Code: 12.3
DHS notes the commentor's stormwater concerns. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Grassy swales, retention ponds, pervious pavement, and onsite reuse are examples of available stormwater management options. Section 3.13.8 describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects. The EIS describes post-construction stormwater consequences as a valid concern.

Comment No: 7 Issue Code: 18.3
DHS notes the commentor's concern about animal waste and carcass disposal. Section 3.13.2.2 of the NBAF EIS identifies the waste streams that would be generated by the operation of the facility. Table 3.13.2.2-2 identifies the origins of and pretreatment technologies applicable to waste streams destined for the sanitary sewer and Table 3.13.2.2-3 identifies the origins of and pretreatment technologies applicable to solid waste streams destined for offsite treatment or disposal facilities. As shown on these tables, all of these technologies will render potentially infectious waste streams non-infectious or sterile. 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 shown on the table, all of these technologies produce non-infectious or sterile residuals.

SGWASA's record with regard to pretreatment is beyond the scope of this EIS.

Comment No: 8 Issue Code: 2.0
DHS notes the commentor's question regarding whether oversight of NBAF operations would include representatives from local municipalities. Procedures and plans to operate the NBAF will include the Institutional Biosafety Committee, which will include community representatives as described in Section 2.2.2.6 of the NBAF EIS. Should a decision be made to build NBAF and the site selected, DHS would begin transition and operational planning which would include consideration of policies and procedures for public participation, education, and also public advisory initiatives. After DHS determines the viability and nature of such a public advisory and oversight function, appropriate roles and responsibilities would be defined.
In short, there is not adequate information in the Draft EIS to be able to determine that this facility can be safely built where and as proposed. Therefore this facility should not be built as proposed under the present EIS.

WD6553

Comment No: 9 Issue Code: 4.0
DHS notes the commentor's statement. The NBAF would provide state-of-the-art biocontainment features and operating procedures to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Sections 3.8.9, 3.10.9, 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from an accidental or deliberate pathogen release. 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. 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. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 10 Issue Code: 25.0
DHS notes the commentor's statement.
August 15, 2008

Yes,

This is Harold Carson. I live in Kansas and I would like to make a comment on the location of the NBAF facility.

I am a emeritus professor of biology from Kansas State University and I’ve been a native of Kansas all my life, and I have a real concern about the location of this facility.

It appears that a lot of precautions have been taken and the facilities look like they should be adequate for almost any kind of situation that can be controlled, so it seems to be adequate in that respect. But my big concern is the things that can... that are beyond control, that could cause a major problem. And one of these items is tornadoes. Now, Manhattan has had two tornadoes during my memory and if one of those hit that facility, it could be very devastating. Unless the thing was built like a bunker, way into the ground, a strong tornado could demolish it.

Another area that’s beyond everyone’s control is terrorism. Now a good terrorist, that knows what they’re doing, could destroy almost any facility. And this would make a tremendous target for terrorist, especially since Ft. Riley is close by. So, this is something that no one can really guard against.

The third area of concern is the human factor. Sure they’ve gotta have high qualified scientists working there and maybe a good administration and so on, but, there’s always this human factor. Suppose someone develops mental problems. What can you do about this? Somebody can... also somebody develops a grudge against the administration or a fellow employee or something like that. We’ve seen this happen again and again. Recently in the news, this anthrax case has cropped up. So this is something that we cannot do anything to prevent, and sooner or later something like this can happen. And even though the chance of these things happening are very rare, they still can happen, and if they do happen, the effects of it are so serious, so far reaching, especially here in central United States where much of the food production takes place. It’s just too much of a risk to set this facility here.

I think most people that want this facility are just looking at the big dollars that it will bring in and some... a few individuals are going to make a lot of money on this whole deal. So they’re willing to sacrifice the Nation’s food supply for the few bucks that they can make. Because they’re not going to be the one that have the major problem, if there is a problem.

So I’d recommend that it gets put back on Plum Island where it’s off the mainland and just re-build the facilities on Plum Island, to where they would be adequate. But here in the middle of the Nation in the heart of the food production is no place to put something, no matter how many dollars a few people are going to make out of this whole deal.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor’s statement.

Comment No: 2 Issue Code: 21.4
DHS notes the commentor’s concern regarding potential tornado impacts to the NBAF. Sections 3.4 and 3.14.3.2 of the NBAF EIS address NBAF design criteria and accident scenarios associated with weather-related events such as tornadoes, respectively. DHS notes the commentor’s concern regarding a malicious and criminal act perpetrated by a NBAF employee. Section 3.14 addresses accident scenarios, including internal and external events, such as, an “insider” criminal act and terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety.

Comment No: 3 Issue Code: 15.4
DHS notes the commentor’s concern. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9, respectively.

Comment No: 4 Issue Code: 5.1
DHS notes the commentor’s opposition to the Manhattan Campus Site and support for the Plum Island Site Alternative.
So, these are my comments and I strongly oppose the location of this NBAF facility in Manhattan, Kansas.

Thank you.

Bye.
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<tr>
<th>Date:</th>
<th>Aug 25, 2008</th>
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<tbody>
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<td>Regarding:</td>
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<td>Comments:</td>
<td>Please see attached comments from the Kansas Cattlemen's Association regarding the NBAF Site located in Manhattan, Kansas</td>
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- Urgent
- Reply ASAP
- Please Comment
- Please Review
- For Your Information

Total Pages, including cover: 4
August 24, 2008

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

Dear Mr. Johnson,

The Kansas Cattlemen's Association supports a national bio and agro defense facility and the organization strongly promotes extensive bio-security measures to prevent the release of animal disease agents into the environment.

KCA understands that no matter where the facility is built all measures will be used to create the best secure facility possible that current technology allows.

The livestock population of the United States is susceptible to numerous foreign diseases and an outbreak can have severe consequences for producers and consumers. Foot and mouth disease (FMD) is extremely contagious among cloven-hoofed animals, and accidental outbreaks of the virus have caused catastrophic livestock and economic losses in many countries throughout the world. Plum Island has experienced outbreaks of its own, including one in 1978 in which the disease was released to animals outside the center, and two incidents in 2004 in which foot and mouth disease was released within the center. In 2007, the United Kingdom experienced an outbreak of foot and mouth disease from a laboratory that was closed in proximity to farms and ranches. The 2001 FMD outbreak in the United Kingdom demonstrated the devastation FMD can bring. The following diseases have currently been defined by the Department of Homeland Security and the U.S. Department of Agriculture (USDA) as possibilities for study at the National Bio and Agro-Defense Facility (NBAF):

- Foot and Mouth Disease (FMD)
- Classical Swine Fever (CSF)
- African Swine Fever (ASF)
- Rift Valley Fever (RVF)
- Contagious Bovine Pleuropneumonia (CBPP)
- Japanese Encephalitis (JE) virus
- Nipah Virus
- Hendra Virus

Diseases that will be studied at the NBAF will be highly contagious, zoonotic, and highly detrimental should they be accidently released into the population.
DHS notes the commentor’s opposition to the five mainland site alternatives.

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 of the NBAF EIS. The primary economic effect of an accidental release would be the banning of United States livestock products regardless of the location of the accidental release, which could reach as high as $4.2 billion until the United States was declared foreign animal disease free. The risk of a pathogen release from the proposed NBAF at each of the proposed sites was evaluated in Section 3.14 of the NBAF EIS and was determined to be low for all sites.

DHS notes the commentor’s support for the Plum Island Site Alternative.
As a diagnostic facility, PIADC scientists study more than 40 foreign animal diseases and several domestic diseases. With all of the factors mentioned above, KCA hopes you will take great consideration when making a final decision regarding site location for the proposed NBAF. The Kansas Cattlemen’s Association appreciates the opportunity to share concerns and would be happy to answer any questions that should arise from these comments provided to you.

Sincerely,

Brandy Carter
Executive Director
Kansas Cattlemen’s Association
606 N. Washington
Junction City, KS 66442
785-238-1453