

Duncan, PhD, William**Page 1 of 1**

WD0621

From: Bill Duncan [REDACTED]
Sent: Saturday, August 23, 2008 12:08 PM
To: NBAFProgramManager
Subject: NBAF in Kansas

Dear NBAF Selection Committee:

1|24.4; 2|8.4 | Kansas is clearly an excellent location for the NBAF laboratory given the overwhelming acceptance of the citizens of such a facility and the substantial academic, private sector, and related animal health assets in the region. Based on the technical merits and the commitment of the state the choice of Kansas is ideal for providing the support needed to protect and safeguard our country's food supply and agricultural assets.

Sincerely,

William P. Duncan, PhD

[REDACTED] MO

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 statement.

Duvall, Zippy**Page 1 of 1**

 <p>Georgia Farm Bureau Companies</p> <p>Georgia Farm Bureau Mutual Insurance Company Georgia Farm Bureau Investment Company Georgia Farm Bureau Holding Company</p> <p>Georgia Farm Bureau Federation Georgia Farm Bureau Real Estate Company Georgia Farm Bureau Casualty Insurance Company Georgia Farm Bureau, Incorporated</p> <p>MD0085</p> <p>www.gfb.org</p> <p>August 13, 2008</p> <p>Science and Technology Directorate, James V. Johnson U.S. Department of Homeland Security Mail Stop #2100 245 Murray Lane, SW; Building 410 Washington, DC 20528</p> <p>Dear Mr. Johnson:</p> <p>Georgia Farm Bureau is Georgia's largest general farm organization with over 430,000 members, and we are proud to be a part of a broad based coalition which supports the location of the National Bio and Agro-Defense Facility (NBAF) in Athens, Georgia.</p> <p>1 24.2 Our members were pleased to receive the news that Athens was selected as one of the finalists for the facility. We believe Athens is the ideal location. The resources of the University of Georgia College of Agricultural & Environmental Sciences are nearby, and the Centers for Disease Control & Prevention in Atlanta is in close proximity. Additionally, the quality of life around Athens will be a positive factor when recruiting scientists and technicians to work in the facility.</p> <p>2 15.2 Georgia is the number one poultry state in the nation with a farm gate value of over \$4.7 billion which represents nearly 41% of Georgia's total farm gate value. Georgia also has significant numbers of cattle and equine, and the livestock industry has always played a vital role in Georgia agriculture. Our members understand the value of the NBAF facility and have a vested interest in it.</p> <p>1 cont. 24.2 Georgia Farm Bureau strongly supports the location of the National Bio and Agri-Defense Facility in Athens, Georgia. Thank you for the opportunity to provide these comments and our members appreciate the service you provide.</p> <p>Sincerely,</p> <p><i>Zippy Duvall</i> Zippy Duvall President</p> <p>1620 Bass Road • Macon, Georgia 31210 • 478-474-8411</p>

<p>Comment No: 1 Issue Code: 24.2</p> <p>DHS notes the commentor's support for the South Milledge Avenue Site Alternative.</p> <p>Comment No: 2 Issue Code: 15.2</p> <p>DHS notes the commentor's statement regarding the importance of agriculture to Georgia's economy. Section 3.10.3.1.1.2 provides detailed information on the economic value of the agricultural industry in Georgia and in the six county region surrounding the proposed South Milledge Avenue Site.</p>
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Dyar, Dianne**Page 1 of 1**

1| 24.5

August 18, 2008

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

Dear Mr. Johnson:

I am pleased and excited that Mississippi is offering to locate the National Bio and Agro Defense Facility (NBAF) here in Madison County. NBAF will provide a focal point for efforts across the full range of education, research, development, and technology transfer related to protecting the public and agricultural industry from the threat of biological attack. We believe that having the NBAF here puts Madison County at the cutting edge of animal and public health, and will act as a magnet for the very best and brightest in the relevant fields to come to Madison County and be a part of our vibrant civic and cultural life. We also greatly appreciate the opportunity this gives the State and Madison County to play an important role in the defense of the homeland.

We are fully supportive of this development. Having a nationally recognized science laboratory in Madison County will bring stature and further recognition to our growing area. Expanding the local job market is certainly a mission of the Madison County Chamber of Commerce. The more than 400 jobs that are anticipated at NBAF will provide a tremendous boost to our local economy. The addition of NBAF will only serve to enhance our reputation as being of the best places in the nation to live, work, and play.

The work that will be done in the planned NBAF will have a tremendous impact on helping deter and defeat those who would choose the path to do our Nation harm. Madison County will be proud to play a part in this vital effort.

On behalf of business leaders in Madison County, I'm especially excited to endorse the site of NBAF in Madison County!

Sincerely,


Dianne Dyar
Executive Director

www.madisoncountychamber.com

MD0074 !

Phone 601.605.2554
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618 Crescent Blvd.
Suite 101
Ridgeland, MS 39157

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

D'Aloia, Jr., John

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FD0050



Trackside

John D'Aloia, Jr.

311 West Alma Street • St. Marys, KS 66536 • Phone/Fax 785-437-3723
sawsee@oct.net

23 August 2008 AD

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

Dear Mr. Johnson,

I write in opposition to the construction and operation of the National Bio- and Agro- Defense Facility (NBAF) in Kansas, and specifically in Manhattan, Kansas.

Siting the NBAF in the middle of a region devoted to agriculture and ranching is not a wise or prudent action considering the nature of the facility, the propensity for humans to make errors, and the growing population density of the area due to the re-location of the First Army Division to Fort Riley. The escape of any pathogen would have horrendous across-the-board effects.

As a local elected official, I am very much aware of the social, economic, and governance impacts that even the rumor that a case of foot and mouth disease can cause.

The impact would be many orders of magnitude greater when a case was confirmed, devastating the economy, displacing people, and potentially resulting in the disappearance of entire small communities across Kansas. Our town is the center of a grain and cattle area in a county that remains agricultural. Our town contains a sale barn, one of two in the county, both on the east-west U.S. highway that connects Topeka and Manhattan. There is a steady stream of cattle in and out. The movement of cattle to/from the auctions would be a prime vector for the spread of the disease. Besides the cascading economic impact placed on farmers and ranchers by a highly contagious animal disease, the movement constraints placed on the entire population will have its deleterious impact.

But of even more concern is the release of a highly contagious, incurable human disease. Just as the area has a high number of cattle and swine, so does it contain a large number of potential human hosts in the immediate surrounds. From a risk management standpoint, it makes no sense at all to place such a facility in such an area. Entering a risk assessment equation with the host factor being large, known, and close, makes it highly unlikely, absent gross assumption errors, that the result is anything that would pass the prudent person test.

The risk assessment cannot ignore the location of Kansas, and the Manhattan site, in "Tornado Alley", a fact accentuated by the EF4 tornado that recently tore through northeast Kansas, Manhattan, and the KSU campus. When there are alternative site locations without the tornado risk,

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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 concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations 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: 3 **Issue Code: 15.4**
 DHS notes the commentor's concern. The potential effects to livestock-related industries is discussed in Section 3.10.9 and Appendix D of the NBAF DEIS which address the issue of anticipated impacts resulting from an actual outbreak. The primary economic effect of an accidental release would be the potential banning of U.S. livestock products regardless of the location of the accidental release.

Comment No: 4 **Issue Code: 21.4**
 DHS notes the commentor's statement. 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, external events (e.g., traffic accidents etc.), 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. A discussion of existing road conditions and potential effects to traffic and transportation are located in Section 3.11 of the NBAF EIS. A description of transportation of infectious materials is included in Section 3.11.9.

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

Comment No: 5 Issue Code: 21.4

DHS notes the commentor's concern. Risks to human populations at each alternative site were evaluated and discussed in Section 3.14 (Health and Safety) and Appendix E of the NBAF EIS. Modern biosafety laboratories can be safely operated in populated areas. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

As discussed in Section 3.14 and Appendix D of the NBAF EIS, a release of FMD virus would not be

expected to have any affect on human populations as humans are not susceptible to the disease. However, if exposed, humans are potential vectors as FMD virus can persist in the human upper respiratory tract for up to 48 hours. For Rift Valley Fever virus, which is an acute mosquito-borne (vector-based) viral disease, exposed humans could develop severe influenza-like syndrome. As discussed in Appendix D.3, approximately 90% of humans infected with RVF virus show clinical signs of the disease, with an overall mortality rate of approximately 1%. For Nipah virus, exposure to humans can cause severe febrile encephalitis, fever, headache, dizziness, and vomiting with a high mortality rate. Although vectors associated with outbreaks of Nipah are not present in the United States, information from case studies indicate that once infected, mortality rates among humans have ranged from 38% to 75%, as noted in Appendix D.4.

Comment No: 6 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.

D'Aloia, Jr., John

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FD0050

7| 11.4 | it is a waste of resources to locate a facility in an area that requires it to be constructed to withstand a tornado so it will not rip open and spread its contents over hundreds of square miles. The facility's containment systems would also have to be designed to be earthquake proof - the Nemaha fault runs through the area, one of the belated concerns about the location and construction of Tuttle Creek Dam.

8| 5.0 | Yes, the research such a facility undertakes is necessary. What is not necessary is to knowingly locate it in an area where there are no natural barriers to the diseases being studied should all the levels of containment fail - and history does show that all the levels of containment built into laboratories or the safety precautions placed on systems do fail, whether it is the escape of foot and mouth virus at the Pirbright facility in Great Britain in 2007 which led directly to outbreaks of the disease on surrounding farms (a fact which should raise multiple red flags for the Kansas site) or the "mistake" of loading nuclear weapons on a B-52 and flying them across the country.

8 cont.| 5.0 | The NBAF must be physically isolated. If the researchers have to travel many miles each day, so be it. The employees of NRTS Idaho put up with it, recognizing the need to isolate the facility. The transportation cost and inconvenience would be insignificant to the human cost that would occur if just one NBAF release spread a pestilence through the land.

cont.| 5.0 | If Plum Island is no longer a satisfactory site, find another one, either surrounded by water or desert, a site for which nature provides distance and isolation, greatly increasing the odds that there will not be a vector by which a released disease could find a host. (Perhaps NBAF should be collocated with the Idaho National Laboratory - it does encompass 890 square miles.)

I note that the proponents of the Kansas location have made representations that there is no local opposition. I do believe that they must be deaf and blind, or creators of their own reality in their own dimension. There is significant opposition for the reasons I have stated.

The list of elected officials and lobbyists who support the location of the NBAF in Kansas does not impress me. Their heart is probably in the right place, but the risks outweigh the prestige and flow of money that the NBAF represents.

1 cont.| 25.4 | Please do not pick the Kansas site for the NBAF.

Please do pick a site that is remote from host populations, animal and human, and affords natural, last resort barriers to the spread of any disease that escapes the facility. The cliché "not a matter of if it will happen, but when" applies in spades.

Sincerely,

PAGE 02

JOHN D'ALOIA

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Comment No: 7 Issue Code: 11.4

DHS notes the commentor's concerns regarding earthquakes. Section 3.6.1 of the NBAF EIS describes the methodology used to assess each site's potential seismic consequences, and Section 3.6.4 specifically describes the Manhattan Campus Site. Section 3.6.4.1 discusses the Humboldt Fault system, also known as the Nemaha Fault, and was considered in the analysis of seismic risk to the Manhattan Campus Site. The NBAF would be built to meet or exceed all applicable building codes for seismic safety. Section 3.14.3.2 further addresses NBAF design criteria and accident scenarios associated with natural phenomena events such as earthquakes.

Comment No: 8 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 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.

E, David**Page 1 of 1**

WD0312

From: Off Campus Realty Inc. [REDACTED]
Sent: Sunday, August 17, 2008 8:32 PM
To: nbafprogrammanager@dhs.gov
Subject: NBAF Athens GA

1|24.2; I wanted to express my support for the Athens NBAF site. I am
2|21.2 confident that with all the new technology available a newly
constructed facility would be 100% safe to our community.

NBAF Athens!

David E.
Broker/Owner
Off Campus Realty Inc.
[REDACTED] GA

Comment No: 1 Issue Code: 24.2

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

Comment No: 2 Issue Code: 21.2

DHS notes the commentor's support for the NBAF and understanding that the proposed research
would be safely conducted at the South Milledge Avenue site.

Ebell, Mark**Page 1 of 1**

WD0325

From: Mark Ebell [REDACTED] on behalf of Mark Ebell [REDACTED]**Sent:** Monday, August 18, 2008 1:30 PM**To:** NBAFPProgramManager**Subject:** Support for NBAF in Athens, GA

I would like to formally express my strong support for locating the NBAF facility in Athens, Georgia. The university and our community provide an ideal setting for this facility, given our strong and rapidly growing track record of research in the biomedical sciences and the wonderful quality of life afforded by the Athens area. I am chair of our local [REDACTED] and we foresee greenway trails in the southern part of the county that will even make it possible for your staff to bicycle to work.

We are in the process of developing a medical campus in Athens in partnership with the Medical College of Georgia, with students arriving in August, 2010. This will provide a further impetus to the development of biomedical science research in the area and provides a possible opportunity for your staff to have adjunct or joint appointments with a medical school campus if they so desire.

Sincerely,

Mark

Mark H. Ebell, MD, MS
[REDACTED]Comment No: 1Issue Code: 24.2

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

Eberhardt, Deena

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WD0070

From: Deena Eberhardt [REDACTED]
Sent: Monday, July 14, 2008 3:42 PM
To: NBAFProgramManager
Subject: NBAF Site

1| 25.2 I would like to make it known that I do not want to have this facility located in Athens, Ga.

Deena Eberhardt

Comment No: 1 Issue Code: 25.2

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

Edleston, Robert

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KSD019

NATIONAL BIO AND AGRO-DEFENSE FACILITY
Science and Technology Directorate/Office of National Laboratories

U.S. DEPARTMENT OF HOMELAND SECURITY

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: Dr. Rob Edleston
Title: President / CEO
Organization: [REDACTED]
Address: [REDACTED]
City: [REDACTED] State: KS Zip Code: [REDACTED]

Comments: We at the technical college stand ready to support the NBAF through our programs of study and response to the needs of Business and Industry

(Continued on back for your convenience)

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

Edmondson, Esq., Liz**Page 1 of 5**

MD0023



Post Office Box 1070
Frankfort Kentucky 40602
(502) 875-2428 phone (502) 875-2845 fax
e-mail fitzKRC@aol.com
www.kyrc.org

August 4, 2008

U.S. Department of Homeland Security
Attn: James V. Johnson
Mail Stop #2100
245 Murray Lane, SW, Building 410
Washington, D.C. 20528

Re: Comments on the National Bio and Agro-Defense Facility Draft Environmental Impact Statement

Dear Mr. Johnson:

These comments are submitted on behalf of the Kentucky Resources Council concerning the Draft Environmental Impact Statement (DEIS) for the National Bio and Agro-Defense Facility. The Kentucky Resources Council, Inc. (KRC) is a non-profit, 501 (c)(3) tax-exempt organization that provides legal and technical assistance on environmental issues to individuals, community groups, and local governments throughout the Commonwealth of Kentucky. After a review of the DEIS, the Council offers the following comments:

1| 26.0

1. The DEIS is insufficient under the National Environmental Policy Act ("NEPA") in that it fails to consider the environmental, health and public safety impacts of a release of each pathogen it proposes to study at the facility, as well as a concurrent release of all pathogens proposed for study. Regulations promulgated by the Council on Environmental Quality ("CEQ") direct federal agencies, when preparing an environmental impact statement under NEPA, to "provide a full and fair discussion of significant environmental impacts . . ."¹ The regulations define effects (which are

¹ 40 CFR 1502.1

Comment No: 1 Issue Code: 26.0

DHS notes the commentor's concerns. The NBAF EIS was prepared to provide a thorough analysis of the aspects of NBAF construction and operations at the six site alternative locations. The potential impacts of NBAF operations on environmental resources, health and safety, and on local transportation are discussed in Chapter 3 of the NBAF EIS.

Edmondson, Esq., Liz

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		MD0023
1 cont. 26.0		<p>synonymous with "impacts") to include both direct and indirect effects of the project, stating that indirect effects are caused by the action and occur later in time or farther in distance than direct effects, "but are still reasonably foreseeable."² Thus, the CEQ regulations require that in discussing direct and indirect effects of the proposed action³, the agency must include a discussion of indirect effects of the action, including reasonably foreseeable effects.</p>
2 21.0		<p>In light of the requirements of NEPA, the Council is concerned that the Draft Environmental Impact Statement did not fully outline and address the reasonably foreseeable environmental impacts associated with this facility. In determining the probable environmental consequences of a pathogen release, the agency considered only three of the eight potential pathogens that the facility would initially study. While the agency reasoned that the pathogens considered in the analysis (Foot and Mouth Disease Virus ("FMDV"), Rift Valley Fever Virus ("RVFV"), and Nipah Virus) present the most significant and unique challenges compared to the other pathogens, this reasoning ignores the probable lesser impacts of the unstudied pathogens and dismisses these risks contained within the risk factors of the three pathogens chosen for evaluation.⁴</p> <p>This analysis fails to account for the differences of the unstudied pathogens in the areas of host susceptibility to infection with the pathogen, the ability of the pathogen to cause impacts to livestock and wildlife, the ability of the pathogen to become geographically disseminated, and the ability of the pathogen to be transmitted in the unique settings of the six different sites chosen for evaluation; all areas the agency believes represent required knowledge and understanding in developing an adequate risk assessment.⁵ The agency also considers other factors in assessing the risk for zoonotic and non-zoonotic pathogens such as whether the agent is endemic or foreign to the region, the pathogen's ability to cause morbidity and mortality, the shedding patterns of the agent in relevant species, and whether an active control or eradication program exists for the disease.⁶ In failing to evaluate five of the eight potential pathogens to be studied at the proposed biocontainment facility, the agency would have us believe that the risks of infection or outbreaks of all the pathogens are the same, despite the fact that these key determinants of risk are answered differently depending on the pathogen at issue.</p>
3 19.0		<p>The agency is required to evaluate all reasonably foreseeable significant environmental impacts of the proposed facility.⁷ While the agency notes that FMDV, RVFV, and Nipah virus are the primary hazards associated with the proposed project, any pathogen</p>

² 40 CFR 1508.08

³ 40 CFR 1502.16

⁴ US Department of Homeland Security National Bio and Agro-Defense Facility, Draft Environmental Impact Statement, June 2008, p. 3-366

⁵ US Department of Homeland Security National Bio and Agro-Defense Facility, Draft Environmental Impact Statement, June 2008, p. 3-367

⁶ US Department of Homeland Security National Bio and Agro-Defense Facility, Draft Environmental Impact Statement, June 2008, p. 3-367

⁷ 40 CFR 1508.8

Comment No:	Issue Code:
Comment No: 2	Issue Code: 21.0

Section 3.14 and Appendix E of the NBAF EIS presents the accident analysis for selected accident scenarios. This scenario selection process considered accidents from the more common hazard categorizations (spills, contaminations, laboratory equipment failure, procedure failures, laboratory-acquired infections, transport, process upsets, etc.) in addition to unique accidents with low frequencies but with unacceptably high consequences (deflagrations, natural phenomena accidents, external accidents, etc.). Details of the accident consequences are presented on a site-specific basis in Section 3.14.4 of the NBAF EIS. The analysis addresses the accidental release of the FMD virus, RVF virus, and Nipah virus because the diseases caused by these three pathogens sufficiently cover the spectrum of outcomes likely to occur if any pathogens to be studied at the proposed NBAF were to be released to the surrounding areas. As Section 3.14 notes: "These were chosen such that pathogens from both biodefense levels are represented, and such that the greatest potential for disease spread is represented" in the risk analysis. In evaluating the potential impacts and responses to the release of the bounding disease, all foreseeable significant environmental impacts can be assessed either as an individual or as a cumulative impact.

Comment No: 3 Issue Code: 19.0

DHS notes the commentator's concerns. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the NBAF EIS. The risks were determined to be low for all site alternatives. The analysis addresses the accidental release of the FMD virus, RVF virus, and Nipah virus. The diseases caused by these three pathogens sufficiently cover the spectrum of outcomes likely to occur if any pathogens to be studied at the proposed NBAF were to release to the surrounding areas.

Edmondson, Esq., Liz**Page 3 of 5**

		MD0023
3 cont. 19.0		requiring a biocontainment level of BSL-3 or BSL-4 is extremely hazardous in that it can cause death to humans, and at the BSL-4 level there is no treatment for pathogen infection. Failure to study the potential release of each and of various combinations of all eight pathogens makes the DEIS incomplete in terms of risk assessment because responses to a pathogen release would differ depending on the pathogen, since each pathogen is transmitted differently, through different hosts and vectors, each of which have unique characteristics and may or may not be present at the various proposed sites. Thus, by not studying five of the eight pathogens the DEIS fails to take into account the differences in disease treatment and containment should the pathogen spread, including differing emergency response and containment strategies. Finally, by failing to study the environmental impacts of each individual pathogen, the agency has not adequately identified the environmental effects of the proposed facility so that they can be compared with economic and technical analyses, as required by CEQ regulations. ⁸
2 cont. 21.0		
1 cont. 26.0		Since 40 CFR 1502.1 directs that environmental impacts should be discussed in proportion to their significance, it seems that because the risk of a pathogen release is one of the most significant environmental impacts associated with the proposed development, that the environmental consequences of a pathogen release <i>for each type of pathogen</i> should be discussed. Since appropriate information is necessary for good decision making, it is unclear how an informed decision can be made in terms of whether to and/or where to site the proposed facility when the environmental, health and safety impacts of over half the pathogens to be studied at the facility are not fully addressed, especially in terms of how each unique pathogen would impact the unique environments of each proposed site. As a result, the Council recommends that the agency fully evaluate the environmental impacts of each of the eight pathogens proposed to be studied at the facility independently, and (as noted below in #3) in various combinations to simulate a more significant failure of isolation or containment.
4 2.0		2. The Draft Environmental Impact Statement does not comply with NEPA in that it fails to address the health and public safety impact of <i>potential</i> pathogens that will be studied at the facility in the future. Because NEPA requires the draft environmental impact statement to include an analysis of all reasonably foreseeable environmental impacts, this draft environmental impact statement fails to comply with NEPA in that it does not address potential impacts of other pathogens the facility might study in the future. The study of other pathogens that may be evaluated at the facility in the future, and the release of other pathogens is a reasonably foreseeable environmental impact since the DEIS states, “[a]s new diseases emerge and threaten U.S. livestock, additional risk assessments would be performed and the list of high-consequence diseases studied at NBAF could be changed.” ⁹ Although the

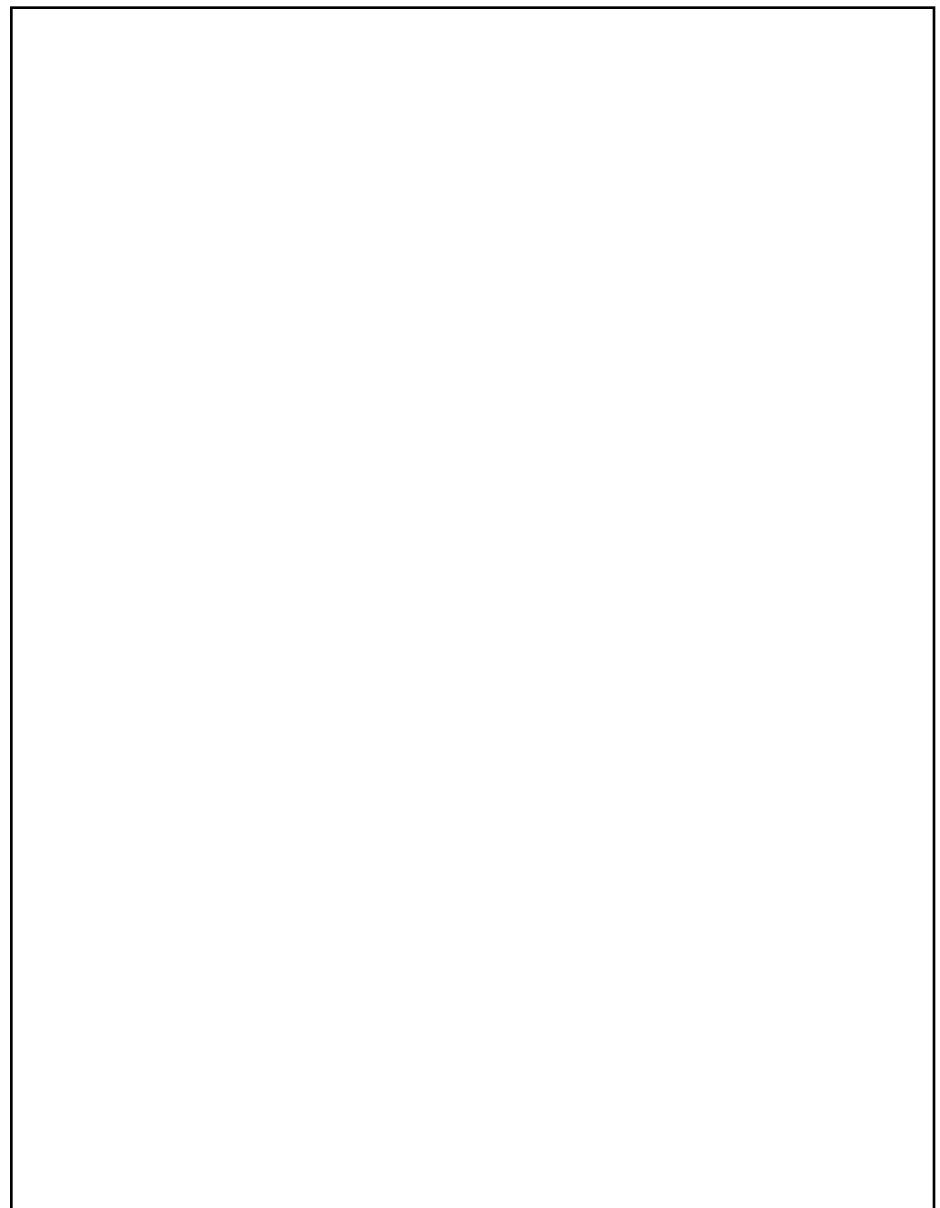
⁸ 40 CFR 1501.2(b)⁹ U.S. Department of Homeland Security National Bio and Agro-Defense Facility, Draft Environmental Impact Statement, June 2008, p.1-2.

Comment No: 4	Issue Code: 2.0
DHS notes the commentor's concern that all possible pathogens to be studied at the NBAF are not listed in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Section 2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluation of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required.	

Edmondson, Esq., Liz**Page 4 of 5**

	MD0023
4 cont. 2.0	DEIS notes that any new pathogens studied would be handled with the same degree of protection as the pathogens the facility plans to study, the environmental and socioeconomic impacts of these pathogens could be different than the impacts of the pathogens actually evaluated in the DEIS, depending on the types of animals affected, whether the pathogen is endemic to the area, the potential vectors, routes of transmission, etc.
1 cont. 26.0	While the Council recognizes that those preparing the DEIS could not possibly anticipate all the pathogens the facility could possibly study over its useful life, NEPA provides that where information is incomplete or unavailable, the agency should make clear that such information is lacking or unavailable. ¹⁰ Additionally, while the agency cannot anticipate each and every pathogen it will study at the proposed facility, the agency should briefly summarize the estimated environmental impacts of pathogens that the agency believes it will most likely study in the future or impacts of the types of pathogens the facility anticipates studying. It is not sufficient for the agency to prepare a supplemental EIS or Environmental Assessment in the future as it begins to study new pathogens, since the decision to site the facility at a certain place will have already been made and a supplemental EIS or EA will not likely affect that decision even where the introduction of a new pathogen might raise the incremental risk to a level that could have affected the initial siting decision. Failing to anticipate the environmental consequences of the study of other, possibly unknown, pathogens does not account for the direct, indirect, and cumulative impacts of those pathogens on the environment, and thus is not taken into account in the decisionmaking process <i>now</i> , when it could have a material effect on the initial siting decision or facility design. Deferring consideration of the effects of introduction of other pathogens until they are more firmly proposed for study at the facility, undermines the goals of NEPA of ensuring that planning and decisionmaking reflect environmental values and that prior to irretrievable commitment of resources, the full scope of effects and alternatives have been evaluated.
	The Council recommends that the agency assess the possible environmental consequences of a release of anticipated pathogens the facility may study in the future, as this is a reasonably foreseeable environmental impact of the proposed facility. In the alternative, the Council suggests that the final EIS state that the information on potential pathogens the facility might study is unknown, in accordance with 40 CFR 1502.22, and that some additional increment of conservatism be built into the risk assessment to address this uncertainty.
2 cont. 21.0	3. The DEIS fails to consider the environmental impacts of a release of multiple pathogens from the site at the same time. By failing to study the environmental consequences of a release of each individual pathogen proposed for study at the facility, the agency is unequipped to determine the

¹⁰ 40 CFR 1502.22



Edmondson, Esq., Liz**Page 5 of 5**

2 cont.| 21.0

MD0023

possible cumulative, synergistic or additive effects of a release of some or all of the pathogens studied in the facility in the event of a power failure, explosion, or other such incident.

In evaluating the impacts of a proposed federal action, the agency is required to evaluate the cumulative impact of its action, defined as the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions.¹¹ As such, the agency must consider not only isolated effects of different aspects of the action, but must consider the impacts of the action as a whole, as well as the contribution of other impacts not necessarily attributable to the proposed action, but reasonably foreseeable.

After evaluating the environmental impacts of each pathogen proposed to be studied at the facility, the Council recommends that the agency evaluate the cumulative impacts of a concurrent release of all pathogens from the facility, taking into account the unique characteristics and other impacting factors at each location.

Thank you for your consideration of these comments.

Cordially,



Liz D. Edmondson, Esq.
Edith and Barry Bingham Jr. Fellow

¹¹ 40 CFR 1508.7

Edwards, Tom**Page 1 of 1**

CD0903

From: [REDACTED] on behalf of Tom Edwards [REDACTED]

Sent: Saturday, August 23, 2008 12:06 PM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 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, GA.

2| 5.0 As Connecticut Attorney General Richard Blumenthal has stated, "This facility would study and experiment with the most dangerous disease organisms, including pathogens transmitted from animals to humans, that have no known cures or vaccines... Some of these diseases don't otherwise exist in this country." If NBAF must be built, its only appropriate location would be far removed from any concentrated human and commercial animal populations - certainly not in Athens, GA.

1 cont.| 25.2 I am strongly opposed to NBAF being built in Athens, GA.

Sincerely,
Tom Edwards
[REDACTED] GA

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: 5.0

As described in Section 2.3.1, DHS's site selection process including 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. Other locations considered but eliminated from further study are described in Section 2.4.3.

Ehm, Paul**Page 1 of 1**

PD0350

August 25, 2008

1| 25.4

This is Paul Ehm at [REDACTED] I'm an individual. I'm a cattle producer. I kind of feel that I don't like to have this animal disease thing in our community because I'm scared of this hoof and mouth and all other diseases, and I think we're in the heart of the foothills where there is lots of cattle, and if it would ever get out it would be kind of disastrous in my way of thinking.

2| 5.0

And so therefore, I think that is should be put someplace else where it's more isolated and not as many risks of individual farmers and cattlemen in this area.

Thank you and we'll hope that you decide against it.

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: 5.0

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

Ehm, Shirley**Page 1 of 1**

PD0352

August 25, 2008

Hi.

1| 25.0 My name is Shirley Ehm, and I'm a [REDACTED] resident, [REDACTED] Kansas resident, and I'm against the NBAF that's going to....may be put on K-State campus. And I'm also against it anywhere in the United States.

Kansas State has a population of around 20,000, or maybe more, I'm not real sure on this, and then there are about that many residents in Manhattan. We are in the heart of the foot hills with a very large population of wild animals, especially deer and turkey, just to mention two. Also we have lots of mosquitoes and flies, etc., that would be carriers.
2| 21.4 We're just afraid of a breakout of some kind.

I'm just against it.

Thank you.

Bye.

Comment No: 1 Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF in the U.S. However, as described in Chapter 1 of the NBAF EIS, the purpose and need for the proposed action encompasses the need for integrated, BSL-4 laboratories in the United States necessary to conduct research and develop countermeasures for zoonotic and foreign animal diseases.

Comment No: 2 Issue Code: 21.4

The DHS notes the commentor's concern with the risks associated with a pathogen release. 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, and 3.14 (Health and Safety), and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from a accidental or deliberate pathogen release. Pathogen release scenarios include for example, an analysis of the potential consequences of Rift Valley Fever (RVF) virus becoming established in native mosquito populations. 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. 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.

Eikenberry, Julie**Page 1 of 1**

WDL023

From: Scott City Chamber Director [sccca@wbsnet.org]

Sent: Tuesday, September 02, 2008 10:13 AM

To: NBAFProgramManager

Subject: Will you consider Scott City?

Good Morning!

1|5.0 Here, in Scott City, we have a huge cattle population...the largest in the country, in fact. Also, we have a large agricultural community. If you are looking for a place to have your headquarters, I believe we might be a good choice.

Our community is growing and prospering. The housing is fairly good and we have a great Motel situation. Our schools are second to none and we are pretty progressive in our community development. Scott City is becoming a regional hub as the smaller towns around us downsize their amenities.

If you are interested in Western Kansas, you can't go wrong with Scott City. Give me a call and we can discuss this further.

Have a terrific day!

Sincerely,

Julie Eikenberry
Executive Director
Scott City Area
Chamber of Commerce
Economic Development
620-872-3525
113 E 5th
Scott City, KS 67871
sccca@wbsnet.org
www.scottcitycoc.com

Comment No: 1 Issue Code: 5.0

DHS held a competitive process to select potential sites for the proposed NBAF as described in Section 2.3.1 of the NBAF EIS. A team of federal employees representing multi-department component offices and multi-governmental agencies (i.e., DHS, U.S. Department of Agriculture, and Department of Health and Human Services) reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the EIS as alternatives for the proposed NBAF.

Elder, Harry

Page 1 of 2

1 25.2	<p style="text-align: right;">MD0008</p> <p>Just Say "no" to NBAF</p> <p>A Tuesday letter to the editor from Michael Buckholz, "NBAF opponents should think locally, act locally," has it right in concluding that opposition to NBAF should be focused on local decision-makers. This is so because the majority of area citizens didn't consent to any invitation for DHS to locate potential pestilence in our midst. Instead of being comforted by the "more is less" minimizing of proponents, homeowners should be duly alarmed. Not by alarmists, but by evidence that has now been presented convincing us that we must overcome those interests determined to impose a dangerous and costly nuisance on our community.</p> <p>Politicians who "know what is best for us" have tried to ignore genuine concerns with the hope that critics would just go away. Many persons and interests, legitimately concerned about the slow local economy, are tempted by golden promises. The spectacle of academics losing objectivity through exaggerations and favoring secrecy has not been pretty to watch.</p> <p>When I say that the evidence is in, one need not go beyond statements within the Draft Environmental Impact Statement released by the Department of Homeland Security. The following admissions should be understood by every citizen concerned with family safety: "...wildlife, vegetation, agriculture, and human populations provide ample opportunity..." in our area for viruses to become rapidly spread. Mosquitoes infected with pathogenic organisms could lead to a "permanent reservoir of virus." A Level IV NBAF facility, according to the DEIS, would be safer for animal and human populations if located offshore, and in particular at Plum Island, N.Y.</p> <p>Proponents of locating NBAF here are quick to point to the CDC in Atlanta as exemplary in safe handling of harmful germs. Recent news stories, however, have exposed multiple problems with power outages and leaks with the potential for</p>
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2 21.2	<p>Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.</p> <p>Comment No: 2 Issue Code: 21.2 DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. 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 of the NBAF EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site-specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations 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.</p> <p>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, Section 3.10.9, and Section 3.14 of the NBAF EIS. Response plans would include a mosquito control action plan.</p> <p>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.</p>
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Elder, Harry**Page 2 of 2**

4| 12.2

MD0008
catastrophe and repairs with duct tape. The CDC has recently been under investigation for withholding information about threats to humans by pollution at sites in the Great Lakes region.

The exacerbation of water scarcity does not favor NBAF. Estimates of water consumption by the labs have grown from 28,000 gallons per day to 43 million gallons per year, as acknowledged by DHS. What will happen to property values in the Athens area when "America's No. 1 Retirement City" adds possible threats to safety to drought conditions? The DEIS pointedly doesn't say.

5| 15.2

While there is no doubt that NBAF construction and employment would eventually bring money to the area, the requirements for infrastructure additions and changes would inevitably require an unknown, immediate increase in taxation. The statement that additional roads, for example, would not be needed will come as a great surprise to five o'clock motorists at the intersection of Milledge and Whitehall.

Economic and academic enhancements should be pursued when they are in the best interest of all citizens in our wonderful community. But how many risks and what costs must be borne by a community in pursuit of illusory benefits? Clearly the NBAF proposal is one best left on the doorstep.

Submitted by: Harry m. Elder
[REDACTED] Georgia

Comment No: 4 Issue Code: 12.2

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

Comment No: 5 Issue Code: 15.2

DHS notes the commentor's concern regarding the state and local government's cost associated with constructing the NBAF. Funding for the design, construction, and operations for the NBAF will come from the Federal Government. Proposals for offsets to the site infrastructure (part of the construction costs) were requested by the Federal government. The decision as to what to offer (land donation, funding, other assets) is solely at the discretion of the consortium, state and local officials as part of the consortium bid site package. The amount of funding and how the funding is paid for (bonds, taxes, etc) is determined by the state and local government officials and not the decision of the Federal government.

Elliott, Emery**Page 1 of 1**

PD0213

August 22, 2008

1| 5.0
2| 25.4

This is Emery Elliott from [REDACTED] Kansas. I want to speak in opposition to the bio lab that supposedly is going to be built inland in this country somewhere. The site closest to me would be up at Manhattan, Kansas. I think the possibility of something horrible happening from a lab such as this, at an inland point would be...it would be disastrous to this country.

3| 24.1
1 cont.| 5.0
2 cont.| 25.4

I urge you to keep this – I understand it's on an island now and I urge you to keep it on an island. I'm not just opposing it being at Manhattan, Kansas – I am opposing it being anywhere on the mainland.

My phone number is [REDACTED]

Thank you. Bye.

Comment No: 1 Issue Code: 5.0

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

Comment No: 2 Issue Code: 25.4

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

Comment No: 3 Issue Code: 24.1

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

Elliott, Kyle**Page 1 of 1**

WD0402

From: Elliott, Kyle L. [REDACTED]
Sent: Wednesday, August 20, 2008 10:55 AM
To: NBAFProgramManager
Cc: Tom Thornton
Subject: Kansas: Best for NBAF

I am a long time Kansas resident having been born and raised in [REDACTED] Kansas. After a short four year stint in [REDACTED] following graduation from Engineering School and Law School, I returned to Kansas at my first opportunity in 1996. Since that time, I have been active in many technology sectors and in the economic development of the state. Currently, I volunteer my time on the Board of Directors as the Vice-Chairman for the [REDACTED] Corporation, which is a large player for economic development in Kansas. Many individuals have sacrificed considerable time and placed considerable effort into economic development and the infrastructure in Kansas allowing the continued development of world leading crop science and animal health industries as well as significant life sciences research and industry.

1|24.4 | For these reasons and many more, NBAF belongs in Kansas on the merits due to our unique ability to protect America's food supply and agriculture economy.

Kyle L. Elliott

[REDACTED]
MO [REDACTED]

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Comment No: 1 Issue Code: 24.4

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

Ellis, Mike and Brenda**Page 1 of 1**

WD0393

From: [REDACTED]
Sent: Wednesday, August 20, 2008 8:32 AM
To: NBAFProgramManager
Subject: Stupidity does rear its ugly head again!

1|25.3;
2|5.0;
3|2.0;
1 cont.
25.3

It does not take a rocket scientist to figure out that the facility being planned is a no win situation for ALL OF GOD'S PEOPLE! Come on! Use your brain for goodness sake! (Hopefully you do have a brain lodged in your skull.) Use it to THINK FOR ONCE in your life! The people of Butler DO NOT WANT the Bio-Ag facility anywhere, and most assuredly NOT IN BUTLER! I think it is shameful that the facility is being planned at all! But if it has to become a reality, update the facility on Plum Island or put it in the middle of the desert where populations of mental patients, prisoners, developmentally challenged patients, and communities of good, hard-working people do not live. You have lied about the cost. You have lied about the potential "growth and good" for the community! You have lied from day one about jobs to be created and coming from the area chosen! How stupid do you think we are? We have done our homework; now you do yours.

NO BIO IN GRANVILLE COUNTY! NO BIO IN NORTH CAROLINA!

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

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 Umstead Research Farm Site Alternative.

Comment No: 3 Issue Code: 2.0

DHS notes the commentor's concern that NBAF local employment estimates in the NBAF EIS are overstated. The number of short-term and permanent jobs are discussed in Section 3.10 of the NBAF EIS. It is expected that approximately 2,700 direct temporary jobs (2,100 for the Plum Island Site) would result from construction of the NBAF, with many of the jobs being filled locally. Between 250-350 permanent jobs would result from operation of the NBAF, with much of the scientific work force relocating to the region.

Ellsworth, DVM, Steve**Page 1 of 1**

WD0689

From: Ellsworth, S (Steve) [REDACTED]
Sent: Monday, August 25, 2008 10:07 AM
To: NBAFPProgramManager
Subject: Support NBAF Facility in Kansas

1|24.4 Hello -- I am writing to express my support for locating the National Bio and Agro-Defense Facility at the Manhattan, KS site. My specialty is infectious diseases of animals; my career has been spent developing, licensing with the USDA, and manufacturing vaccines for veterinary use with two major animal health pharmaceutical firms. Scientists working in a government facility, like the proposed NBAF, do a superb job laying the foundation required to prevent, detect, and control diseases (exotic or otherwise) -- I have worked with several over the years. However, it will take the infrastructure and know-how of private sector firms to help turn this basic work into practical control measures (e.g. diagnostics or vaccines) in a rapid, cost-effective manner. The proximity of the Manhattan, KS site to most of the major US animal health industry research and manufacturing facilities would greatly facilitate industry and government scientist collaboration -- would facilitate working in each others' labs and animal testing facilities, and joint seminars, with relatively easy travel -- not having a large travel hurdle would be a huge, and important, advantage of the Kansas site over any of the others. Also, many of these firms have global subsidiaries that already manufacture vaccines for diseases that are exotic to the US (e.g. AI, FMD, ASF, virulent Blue Tongue) -- this knowledge base would further facilitate the NBAF goal and, again, relationships that would be fostered by personal interactions -- before a crisis situation developed.

2|8.4

Best wishes in making this important decision. Regards,

Steven Ellsworth, DVM, MS, Dip ACVM
[REDACTED]

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-- please immediately and permanently delete.

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 statement.

Elvin, Michael

Page 1 of 2

WD0030

From: [REDACTED]

Sent: Wednesday, July 02, 2008 1:59 PM

To: NBAFPProgramManager

Subject: Potential problems with the Butler location

Dear Sirs:

This is adapted from a letter I wrote my U.S. Representative, David Price (D-NC). But it addresses issues to be found in all of the proposed NBAF locations, and is here offered in that spirit.

1| 13.0 Just one of the many problems to be encountered at the proposed lab concerns aedes albopicta, the "asian tiger" mosquito. This species has now spread across North Carolina, and is known to be a competent carrier of the virulent form of dengue (dengue hemorrhagic fever) and of Eastern equine encephalitis. Also present at the current limit of its distribution is aedes aegypti, a highly efficient carrier for dengue, yellow fever and possibly other viruses. And of course, the globe is warming... so subtropical species are trending northward every year.

2| 21.0 The NBAF proposes to conduct studies of e.e.e., as well as of closely related diseases such as St. Louis equine encephalitis, Japanese encephalitis, contagious bovine pleuropneumonia, Newcastle's disease and novel strains developed in the lab that have previously been unknown in nature.

3| 1.0 Novel strains? I assume you have researched the history of lab activities at the Plum Island lab, and have noted that a basic research pattern has been the development of novel pathogens, in anticipation of their introduction by malign foreign entities. This has always been the primary justification behind our zoonotic pathogen programs: the supposedly defensive development of new strains so we can study them before our enemies find and introduce them. This aspect is always soft pedaled, but present in the background.

4| 2.0 As they have done historically at Plum Island, the driving forces behind these labs always assure the public that no germ warfare research will ever be conducted there. And they are making that claim now for the NBAF as well. But even should we assume that this is indeed the case, the inadvertent mixing of disparate pathogenic strains gathered from diverse source populations is inevitable. And when they encounter new conditions and new vectors, as would happen in a new setting, their pathogenicity would take a new pattern. As it has done many times. Ask a virologist about the patterns of genesis of novel diseases.

5| 21.2 We may assume that in the course of their study of zoonotic disease agents (those that cross species lines between animals and humans) they will be handling as their most basic task, infected animals in conditions that do not preclude their exposure to local aedes populations, including the Asian Tiger.

So we may then conclude as well that there is a high likelihood (or, if you will, the distinct possibility) that arboviruses, encephalitis strains new or old, or other unknown viruses can readily pass from NBAF lab animals to mosquitos native to the North Carolina environment.

We should be particularly concerned with novel disease patterns resulting from the combination of multiple pathogens, as occurs routinely in labs like the one at Plum Island. Borrelia spirochetes, mycoplasmas, the Babesias, the Rickettsias, the chlamidias and Ehrlichias are all heavily implicated in the appearance of new conditions. Such as fibromyalgia, chronic fatigue syndrome, lupus, babesiosis, ehrlichiosis, "Huntsville mystery illness" and other named conditions that very closely mimic the pattern of Lyme disease.

And in fact we have seen the suspicious appearance of new disease outbreaks over the years in the area surrounding Plum Island, NY... not the least of which has been Lyme disease. The problem is that no effective barrier can be devised to separate laboratory animals from insect vectors, and lab protocols are never 100 percent perfect. The autoimmune outbreaks that apparently result are very far from trivial.

Plum Island worked mostly with tick-borne diseases, which the Butler lab would also be doing. But mosquito-

Comment No: 1 **Issue Code: 13.0**

DHS notes the commentor's concerns regarding safe facility operations. 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations, particularly in warm, humid climates, was evaluated in Section 3.8.9 and Section 3.10.9 as well as in Section 3.14 (health and Safety).

Comment No: 2 **Issue Code: 21.0**

DHS notes the commentor's concerns regarding an accidental release of a vector, such as a mosquito, from the NBAF. 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. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. 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. 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the Umstead Research Farm Site is specifically addressed in Section 3.8.9 and Section 3.10.9.5 as well as in Section 3.14.4.5 (Health and Safety). Section 3.10.9.5 discusses the relative suitability of the regional climate of the Umstead Research Farm Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.7.1 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: 3 **Issue Code: 1.0**

DHS notes the commentor's concern regarding the government's intentions for 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. DHS is familiar with procedures at PIADC since DHS is the owner of the facility and DHS and USDA, the partners at PIADC, will be the same partners at NBAF.

Comment No: 4 Issue Code: 2.0

DHS notes commentor's concern that NBAF not become involved in bioweapons research. Chapter 1, Section 1.1 of the NBAF EIS clearly identifies NBAF's mission as defensive which would preclude involvement in 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 and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. 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.

Comment No: 5 Issue Code: 21.2

DHS notes the commentor's concern that the NBAF design can not effectively prevent outside insect vector access to NBAF lab animals. By definition and as identified in Chapter 1, Section 1.1 of the NBAF EIS, BSL-4 facilities are specifically designed to safely handle exotic pathogens that pose a high risk of life threatening disease in animals and humans through the aerosol route and for which there is no known vaccine or therapy. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections and accidental releases. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation.

Elvin, Michael**Page 2 of 2**

6| 13.3 borne diseases like the ones named above would also be under study. And the woods around Butler certainly have many deer, and many ticks.

Would anyone like to be known as the person who introduced some new plague to the area, or to the nation? I recall Mr. Johnson, whose renowned grass is still reviled by farmers. Johnson grass was just an obnoxious weed. A new form of North Carolina encephalitis, as an example, would be a killer and an abomination forever. I wonder whether people would end up calling it "Price's disease".

8| 1.0 In short, it is apparent to me that **none** of the five proposed biolab locations is appropriate to this kind of work, as they are all located in population centers for both humans and domestic animals. It is also apparent that you have accepted the rationale behind the United States supporting an ongoing research program for zoonotic diseases... a position with which I would concur, assuming adequate protections could ever be devised.

3 cont.| 1.0
7 cont.| 5.0 I would therefore suggest that the only suitable venue inside the continental United States would be either Yucca Mountain or Area 51, in the barrens of Nevada. Otherwise the eventual prospects for unintentional introduction of novel diseases into human or domestic animal populations range from possible through likely to inevitable.

Please take this very seriously. Plum Island has chalked up a bad history, and the human element and the prospects for accident will always remain, no matter how well intended, well devised or well presented any "new and improved" program might be.

Sincerely,

Michael Elvin
[REDACTED] NC

Comment No: 6 Issue Code: 13.3

DHS notes the commentor's concern regarding wildlife vectors in the vicinity of the Umstead Research Farm Site. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9 of the Draft EIS. Although the Draft EIS acknowledges the potential for significant wildlife impacts in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction. Section 3.14 addresses human health risks associated with various vectors at the Umstead Research Farm Site.

Comment No: 7 Issue Code: 5.0

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

Comment No: 8 Issue Code: 1.0

DHS notes the commentor's support for the proposed research that would be conducted within the NBAF. DHS also notes the commentor's concerns regarding the pathogens that would be studied in the NBAF. By definition and as identified in Section 1.1 of the NBAF EIS, BSL-4 facilities are specifically designed to safely handle exotic pathogens that pose a high risk of life threatening disease in animals and humans through the aerosol route and for which there is no known vaccine or therapy. It is because of the risks posed that the NBAF is needed in order to provide a modern, integrated high-containment facility to safely and effectively address the accidental or intentional introduction of animal diseases of high consequence into the United States.

Engel, Bruce**Page 1 of 3**

PD0002

June 26, 2008

My name is Bruce Engel. I have looked at all the sites, and to me every one of them except for one is located on land mass. The only one that would be very much more feasible, and more smarter to use would be the Plum Island one because it is not connected to any land mass at all.

1| 5.0 It's also a personal reason why I'm saying what I'm saying because (1) I am a former resident of [REDACTED]. My father, which was one of the Safety Reps on that [REDACTED] from 1954 to 1971 or 70. He's retired and I am his son. I have seen what can be done by what the security force does there. Also, (2) is that I have a step-brother that did work at [REDACTED] also.

2| 2.0 1 cont| 5.0 I feel that my information, and feeling that what I have experienced, and what I have seen and what I know, to me spending 3.3 billion dollars to build another facility, when that same money can be turned around and used there to upgrade the same facility. It is in the best location because if any animal were to escape, then it could be contained immediately, shot, whatever could happen or be done, brought back to where that disease would not spread to any other place or anything else. No matter how many fences you put up. No matter how many remotes you make. The best remotes....moat that there is, is where Plum Island is today - off the shore.

If I remember correctly, my father said many times that Congress set up the point, and one of the criterias was that it had to be off the coast of the United States.

It is in the best location and all that. If it means, and I will be willing to come to speak to any Congressional Hearing or any body else that is willing to listen to what I have to say.

I experienced [REDACTED]. I experienced it as a kid. I understand what the purpose of Plum Island is for. No matter how much it's going to cost to build another place, to tear down or to destroy that island would be a travesty to our agriculture and to our livestock that's in this country.

1 cont| 5.0 We need to stay....Plum Island needs to stay where it is. We need to support it, every which way we can.

Also true is that I currently live in (name of the town is audible), Georgia. I'm a graduate of [REDACTED]. I graduated from there. I live there. I understand fully what the place is all about.

3 | 25.2 To build it in Georgia..Athens, Georgia, and I've looked at the map and looked at everything about it, to me that is the worst....one of the worst places to put it. To me it would be so....I don't care how....like I said, how many fences you put around, and all that, it is in the best location.

Comment No: 1 Issue Code: 5.0

DHS notes the commentor's support for the Plum Island Site Alternative in lieu of the mainland sites. The NBAF EIS fully analyzes the Plum Island Site Alternative. 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: 2 Issue Code: 2.0

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: 25.2

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

Comment No: 4 Issue Code: 15.1

DHS notes the commentor's concern; however, it is not within the scope of the NBAF EIS to evaluate the closure of the existing Plum Island facility. The NBAF EIS only evaluates the environmental impact of the no action alternative and the alternatives for constructing and operating the NBAF.

Engel, Bruce

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PD0002

There have been people that I have known, that have come from far away countries just to study at Plum Island.

I remember many times my father leaving [REDACTED] to go all the way in to Kennedy International Airport to pick up vials to bring out to [REDACTED]. I'm sure today that they do the exact same thing as they do today, or did then, they do today.

1 cont. | 5.0 | Like I said, it has all the facilities that a research center would need, even it is in a safe location, it is secured. Amen

No matter how many....I know without a shadow of a doubt that there have been people that have tried to get into that island, that have been told to leave. I remember an incident that my father said many times that the United States Navy....because Groton, Connecticut is not far away, they would run out of gas and they would come and land on [REDACTED] thinking they could get refuge there. Of course the Coast Guard is there. They would give them gas and tell them to leave. There would be people that would want to spend their day there on the beach, and at other times there were kids, and as my mother and my father would both see these people try to come ashore, we would have to send them off. So, no matter what, a good security force would protect the place a lot better there than putting it on the main land.

Also, I will say it again, I am willing to talk to anybody that would be glad to share what I also have to say about Plum Island.

I am willing to fight to keep it there, even though I do not live there any more in Greenport, Long Island, New York. I am willing to talk to Senators, Representatives, or anybody else.

If anybody would like to get in contact with me they can contact me two ways. I have an e-mail address, and I have my phone number, and my regular address. My telephone number is [REDACTED] Mailing address is [REDACTED] GA [REDACTED] My e-mail address is [REDACTED]

I appreciate my chance of being able to speak on behalf of Plum Island. I have very large fond memories of being a kid on that [REDACTED]. I know what it can do and I know that area, if that was to move, that research center would turn that area into a ghost town. So, please, like I said, if it means that I have to talk to every senator, every representative, presidents of the United States or whoever else, I will be glad to do it, just give me the opportunity and I will be glad to do that.

Thank you for giving me this opportunity to speak on behalf of Plum Island. Whatever you do please keep it there.

Thank you.

Talk to you later.

Engel, Bruce

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PD0002

Have a good day.

Bye, bye.

Engel, Bruce**Page 1 of 1**

PD0001

June 25, 2008

My name is Bruce Engel. My father is Edward, was Edward L. Engel. He was what was commonly known as a Safety Rep with [REDACTED]

1| 24.1

I'm also a former resident of [REDACTED] I'm one of the few that can say that. I am very much interested in letting you know that Plum Island needs to stay exactly where it is because, (1) it is in the right place where it needs to be, as I remember, when Congress set it up, it was set to be off the coast. The choice was Plum Island because of its location and because it was not connected to the main land in any way, shape, or form.

I would also be glad to come before any Congressional Hearing or to any hearing that where a person needs to be.

I've also contacted my Congressman. I live in (name of town was audible), Georgia.

Like I said, I'm a former person that used to live on that island, and that I would be glad to come and speak to anybody that would be glad to hear what I have to say.

If anybody needs to get in contact with me in any way, shape, or form, my number is [REDACTED] and I hope that the Homeland Security will take another look at this because it is a very, very serious situation.

Like I said, I will be glad to talk to anybody that is willing to listen to what I have to say - Amen.

1 cont | 24.1

I hope to God we keep Plum Island where it is - Amen.

Talk to you later. Ya'll have a good day.

Bye, bye.

Comment No: 1

Issue Code: 24.1

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

Engel, Bruce**Page 1 of 1**

PD0010

July 5, 2008

1| 25.0 My name is Bruce Engel. I am strongly, strongly, strongly, opposed to all of the above (inaudible) mentioned sites like Kentucky, Mississippi, the Georgia site, the North Carolina site, and the Texas site. The only site that makes any sense for it to be, is to be at Plum Island. That is the most secure place in all of the country.

2| 24.1 I know what I'm saying because I speak from experience and I speak from a person who has had first-hand knowledge of what Plum Island is all about. I am very much, and I will say again, very much, strongly wanting Plum Island to stay where it is, because (1) my father who was Edward L. Engel, was heavy security,...was part of the security force. He was a Safety Rep on [REDACTED] From 1954 up until 1970, my father was there. Also, for a brief period of time was – lived on that [REDACTED]

Like I said, my name is Bruce Engel, and I am...like I said, I have first-hand knowledge of what...how this facility is run, how the facility is kept and everything else.

To me,if I remember correctly, Congress set it up that it had to be off the main land of the Unites States. That was one of the criteria for it to be where it is. Furthermore, if anybody would like to contact me about what I'm saying, I'd be glad to go anywhere - to come anywhere that you would like. Furthermore, there has never been a study about the people that live there, so I'm willing to do whatever to keep Plum Island where it is.

2 cont.| 24.1 I have talked to my Senator and to my Representatives. I live in the State of Georgia. I live in [REDACTED] Georgia. If anybody would like to contact me, my number is [REDACTED] and I want to keep it there, and I will do whatever I have to do or talk to whoever I have to talk about it.

1 cont.| 25.0 I, like I said when I started, I am thoroughly opposed to all the above sites that are mentioned, and that the only site, and I do mean again, the only site that is feasible smart to keep it where it is, no matter what. Because if its on the main land, there's more of a chance of an outbreak and if Homeland Security is going to move it, just because of where it is, they're wrong. And I would be glad to debate anybody about that certain fact.

Like I said, my name is Bruce Engel and like I said again, anybody that wants to talk to me about it, I would be glad to anytime, any place.

Talk to you then.

Bye, bye.

Comment No: 1 Issue Code: 25.0

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

Comment No: 2 Issue Code: 24.1

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

Comment No: 3 Issue Code: 21.0

DHS notes the commentor's opinion that the proposed NBAF research could not be safely conducted at any of the five mainland site alternatives and the commentor's concern about the risk to health and safety from the NBAF operation. 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 NBAF, would enable NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen. 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 a 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.

Engel, Bruce**Page 1 of 1****CD0402****From:** [REDACTED] on behalf of Bruce Engel [REDACTED]**Sent:** Tuesday, August 12, 2008 4:29 PM**To:** NBAFProgramManager**Subject:** NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 25.2 We are strongly opposed to having NBAF in our community of Athens, GA. The DEIS discloses an "insectary" where disease-spreading mosquitoes and other "vectors" will be bred. It also discloses that any release of pathogen, 2| 21.2 because of our warm, humid climate, could cause the disease to become permanently established in our community.

3| 23.0 How would DHS respond to a release of mosquitoes and other vectors? The EIS needs to show a detailed plan. I did live on that [REDACTED] from 1953 to 1956. Also my Father worked here also from 1953 to 1970. If any one would like to talk to me can call me at [REDACTED]

Sincerely,

(Bruce Engel)

Comment No: 1**Issue Code: 25.2**

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

Comment No: 2**Issue Code: 21.2**

DHS notes the commentor's concerns regarding an accidental release of a vector, such as a mosquito, from the NBAF. 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. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. 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. 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. 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: 3**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. 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.

Engel, Bruce**Page 1 of 2**

PD0056

August 12, 2008

My name is Bruce Engel. My father also worked for [REDACTED] I used to live on that [REDACTED] (1) Also, this is my comment. I have been doing a lot of research and talking to a lot of people. My opinion and what I have known for all the years that my father worked there, and he worked from the beginning up until 1970, is that [REDACTED] (portion of sentence is inaudible) set by Congress, was that it had to be off the coast of the United States.

1|5.1 If the current Congress decides to put it on the mainland it is violating the early rules and regulations. Because the purpose of putting Plum Island where it is, is because of diseases, of foreign diseases coming to the mainland that is a mile off the coast of Long Island, and that there is no way that an animal would be able to swim that far to be get back onto to the mainland.

Plus, (2) is that it has a natural – water. Not only that, but if you're going to spend 3.3 billion dollars to build another facility, it would be smarter and more economical also to keep it where it is and upgrade the place that's there.

2|21.1 There's a lot of men and women over the years that have sacrificed their lives, and their honor, and their duty to protect Plum Island so they would not have any outbreaks. And that is for sure, like I said, it would be against all rules and regulations that was set up, when Plum Island was set up, for it to be where it is.

It would be going, like I said, against all rules and regulations of the Federal Government. So, if that's the case, then that means that any time anybody wants to do something against the rules and regulations, they will try.

My father followed the rules and regulations of [REDACTED] to the letter of the law - Amen. And if our congressmen cannot follow the rules and regulations that they set down, then this country's in bad shape.

I will come to any congressional hearing that anybody would like me to come to. Like I said, my name is Bruce Engel. I live in [REDACTED] Georgia. If anybody needs to contact me my number is [REDACTED]

It is wrong. It is totally wrong, and I will be glad to talk to anybody that would like to talk, to tell me that I am wrong, because I think that I can bring a little bit more better facts, because like I said, I lived on that [REDACTED] from 1953 to 1956. So I will be glad to talk, like I said, to any congressman.

This is probably the third comment that I've made, and I'll keep making them until somebody begins to listen that it's wrong.

Comment No: 1 Issue Code: 5.1

DHS notes the commentor's suggestion. 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. Additionally, the NBAF EIS does fully analyze the Plum Island Site Alternative.

DHS notes the commentor's statement regarding rules and regulations. Chapter 1 of the NBAF EIS describes the purpose and need for DHS's proposed action to site, construct, and operate the NBAF. Section 7524 of the Food, Conservation, and Energy act of 2008 (Farm Bill) directs the Secretary of Agriculture to issue a permit to the Secretary of Homeland Security for work on the live foot and mouth disease virus at any facility that is the successor of PIADC. There are no limitations as to where in the U.S. the facility can be built.

Comment No: 2 Issue Code: 21.1

DHS notes the commentor's statement.

Engel, Bruce

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PD0056

3|5.0 | Do not bring that to the mainland. I repeat again, please do not bring that to the mainland. We don't need it on the mainland. It is better where it's at.

4|24.1 | All the years that Plum Island has been, there's never been a problem. Amen.

Please leave it there. (Sentence inaudible) I will add, that I have talked to my congressman. I've talked to my senator, and I've talked to my governor, the Governor of Georgia, and I've told them the exact same thing that I'm telling you. They don't need it here in Georgia.

5|15.1 | Plus that area needs that place. They could use 300 and some more jobs that'd be an economic boost.

If you want to deprive people (inaudible) of some people getting a better life and a better job.

4 cont.| 24.1; | I want to save Plum Island. We don't need that to come to the mainland.

3 cont.| 5.0 | Thank you for giving me this opportunity.

Talk to you later.

Bye, bye.

Comment No: 3 Issue Code: 5.0

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

Comment No: 4 Issue Code: 24.1

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

Comment No: 5 Issue Code: 15.1

DHS notes the commentor's support for the Plum Island Site Alternative. The economic effects of construction of the NBAF at the Plum Island Site Alternative are included in Section 3.10.6 of the NBAF EIS.

Engel, Bruce**Page 1 of 1**

PD0057

August 12, 2008

1| 24.1 My name is Bruce Engel, and I very much oppose moving Plum Island to any other spot, because (1) Plum Island's the best spot. It's been there long enough. No matter how much it would cost, it would be detrimental to move it to the mainland. Any attempt 2| 5.0 would be disastrous to move it. It has a long history. It has a good history.

And the reason why that I oppose it is because (1) I am one of the few that can say that they actually lived on that [REDACTED]

My father was part of the security force there. It is more secure than any other place that you can put it on the mainland.

If an animal was to escape from there it can be easily found, and easily brought back. And I know there's been no animal has ever escaped from there, or even tried.

But when Congress set it up, one of the rules was that it had to be off the mainland of the United States. It would be bad for it to come back to the United States.

1. cont.] 24.1 And I'll talk to anybody that wants to bother about keeping it there. I definitely oppose - adamantly oppose it. It has its own fire department, own power plant, own water treatment plant. There is no wildlife that has escaped on the island - has exit on the island. Deer which swims upon the island are killed, so that is a good reason. Another reason why it should be kept right where it is because if they bring it to the mainland there's a strong possibility that other animals could easily become on the island. And that where it is now, there is no problem in that.

2 cont.] 5.0

If anybody needs me to appear before your committee or any other committee, please contact me. My name is Bruce Engel. My telephone number is [REDACTED] and I would be glad to.

Talk to you again.

Bye, bye.

Comment No: 1 Issue Code: 24.1

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

Comment No: 2 Issue Code: 5.0

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