Comment No: 1 Issue Code: 27.0
DHS notes the information submitted by the commenter.
LETTERS TO THE EDITOR

Locating NAF in Athens

would come at great cost

As a Tuesday letter to the editor complained, opposition is growing to the proposed National Bio-
and Agro-Defense Facility in Athens-Clarke
County, noting concerns of local residents about potential health issues.

Homes should not be near the site, residents argue.

DHS notes the information submitted by the commentor.

Comment No: 1  Issue Code: 27.0
DHS notes the information submitted by the commentor.
Anonymous MD0042, Anonymous MD0042

Page 1 of 1

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

Chapter 2 - Comment Documents

2-72

NBAF Final Environmental Impact Statement

December 2008
Anonymous MD0084, Anonymous MD0084

Page 1 of 1

Comment No: 1                     Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

To Whom It May (Hopefully) Concern,

As a lifelong resident of [redacted] (not just some Yankee TRANSPLANT trying to protect their property values), I would like to take this opportunity to voice my complete and unequivocal OPPOSITION to the proposed NBAF facility even being considered for locating in Butner, NC. I have attended every public meeting/forum regarding the aforementioned site, and have heard absolutely no viable argument from your so-called "experts" to change my opinion in this regard. Considering what a JOKE the Department of Homeland Security is anyway, you certainly have no business in [redacted]... you are not welcome here, and you will be met with continued, well-organized and outspoken resistance.

1 cont] 25.3 Stay Out of Granville County, NBAF!
AG disparages Plum Island option

Today


Plum Island, eight miles off the Connecticut shore, is one of six sites targeted by the federal government for a proposed Level 4 NBAR, the highest security designation, that would allow study of some of the deadliest biological threats to humans. Plum Island now operates as a Level 3 facility involving only animal-to-animal pathogens.

Blumenthal said the federal government's draft environmental impact statement is "profoundly deficient, and legally insufficient," failing to fully consider the overwhelming risks of this facility, in violation of the National Environmental Policy Act.

Blumenthal said Plum Island should be immediately removed from the list of considered sites.

"Although Plum Island has long hosted research into animal disease, the new facility would take the public health threat literally to a new level," Blumenthal said in a statement. "The environmental security risks are intolerable in an area so densely populated, heavily traveled and environmentally valued. The threat of accident or attack is hardly hypothetical or speculative, as recent experience has taught us to our sorrow. These dangers are real and substantial, and have not been adequately considered."

8/21/2008
ASSAULT ON SIMONTON BRIDGE ROAD

It is understandable that ACC Commissioner Hoard's committee and other persons in Athens are anxious to preserve the lovely streets and homes on Milledge. This would help maintain the property values in that neighborhood and please all citizens.

Some of us feel the same way about Simonton Bridge Road, with its pastoral views and rural character. The construction of a four-lane highway from Whitehall Road to Main in Watkinsville would be disruptive for years, destroy much beautiful land, reduce home values, and hurt business. Under best circumstances, it might be equally preferable to make upper Milledge the NBAF location. Why one and not the other?

It would seem only fair then, that a coin should be flipped with NBAF going to the winner. An upper Milledge location would be convenient to university emprise builders and scientists so eager to study infectious diseases. Sewer and water lines are already present, and it would be easy to add an incinerator. The old mansions of upper Milledge could be converted to dormitories for construction workers, as a contribution by Athens to economic development.

Why is this not funny?
Comment No: 1 Issue Code: 24.5

DHS notes the commentor’s support for the Flora Industrial Park Site Alternative.
Chapter 2 - Comment Documents

Anonymous MSD005, Anonymous MSD005

Page 2 of 2

Thank you for your comments

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

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

Toll-Free Fax
1-866-508-NBAF (6223)
DHS’s mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States. Therefore, it is highly unlikely that future work would be conducted on strictly human pathogens.
Comment No: 1  
Issue Code: 24.1  
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative in favor of the Plum Island Site Alternative.

Comment No: 2  
Issue Code: 21.3  
DHS notes the commentor's concern regarding property values. There is no empirical evidence that a facility such as the NBAF would reduce property values in the study area.

DHS notes the commentors concern about local livestock and animals. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Should the NBAF Record of Decision call for the design, construction, and operation of the NBAF then site-specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the NBAF. Section 3.8.9 of the NBAF EIS addresses existing and potentially applicable response plans that provide insight into some of the livestock and wildlife protective and mitigating measures that could be employed in the event of a pathogen release from the NBAF.

Comment No: 3  
Issue Code: 25.3  
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.
Anonymous PD0008, Anonymous PD0008

Page 1 of 1

July 4, 2008

I think it’s absolutely ludicrous to put the BSL-4 land in tornado alley Kansas or cattle country Texas. Keep it right on Plum Island where it’s been safe, and that’s the only place to put it.

Thank you.

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

DHS notes the commentor’s concern regarding potential tornado impacts to the NBAF. The NBAF would be designed to withstand the normal meteorological conditions that are present within the geographic area of the selected site. The basis for establishing the anticipated wind speeds were the International Building Code, ASCE 7 and the local jurisdictions. However, because of code specified building importance modification factors and normal factors of safety incorporated into the structural design, the facility would resist wind pressures up to 170% of the code specified 50-year wind pressures. 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 exterior walls and roofing of the building would likely fail first, and 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. The loss of these architectural wall components would decrease the overall wind loading applied to the building and therefore diminish the possibility of damage to the building’s primary structural system. Even with the failure of these interior and exterior wall systems under an extreme wind loading event, the robust construction used to construct BSL-3Ag and BSL-4 spaces, reinforced cast-in-place concrete walls, would resist these wind forces and the primary bio-containment envelope would not be breached. The containment walls will be designed to withstand a 200 mph wind load, which is equivalent to an F3 tornado according to the FEMA Design and Construction Guidance for Community Shelters standards.

Comment No: 2  Issue Code: 25.6
DHS notes the commentor’s opposition to the Texas Research Park Site Alternative. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Section 3.10.9 and Appendix D. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Comment No: 3  Issue Code: 24.1
DHS notes the commentor’s support for the Plum Island Site Alternative.
Anonymous PD0009, Anonymous PD0009

Page 1 of 1

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

Comment No: 2 Issue Code: 7.2
DHS notes the commentor's concern regarding the visual effects of the NBAF which are described in Section 3.2 of the NBAF EIS. DHS recognizes that the NBAF would be a distinct visible feature and would alter the visual aesthetics of the area.

Comment No: 3 Issue Code: 15.2
DHS notes the commentor's concern of effects in school systems. The effects on the community including schools are discussed in Section 3.10. The effects to schools and other quality of life resources would be minimal, since the number of new employees from the NBAF would be between 250 and 350, most of which would relocate from outside of the region.

Comment No: 4 Issue Code: 25.0
DHS notes the commentor's opposition to the NBAF.

Comment No: 5 Issue Code: 15.2
DHS notes the commentor's concern. Adverse effects to quality-of-life resources would not be expected with any of the site alternatives and are discussed in Section 3.10 of the NBAF EIS.

Comment No: 6 Issue Code: 12.2
DHS notes the commentor's concern regarding the proposed water use and existing water supply. Section 3.3 includes an evaluation of infrastructure including potable water, and Section 3.7 includes an evaluation of water resources. As stated in Section 3.3.3.1, there is adequate capacity of 43,000,000 gallons per year, but some infrastructure improvements would be required. DHS acknowledges that drought conditions exist in the region, but the NBAF would only account for a minor increase in water use compared to recent development trends.

Comment No: 7 Issue Code: 25.2
Please see response to Comment No. 1.
I found that the Government Accountability Office has stated that the National Bio and Agro Defense Facility is best put on an island. And being a native Kansan, and having had tornadoes of magnitude 5 wipe out the town of Green, and actually hit a Kansas State University, I find that it is very unsafe to have that facility built in a university town in Kansas. And so, I am against having that facility built in Kansas.

Thank you.

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

DHS notes the commentor's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed to withstand the normal meteorological conditions that are present within the geographic area of the selected site. The basis for establishing the anticipated wind speeds were the International Building Code, ASCE 7 and the local jurisdictions. However, because of code specified building importance modification factors and normal factors of safety incorporated into the structural design, the facility would resist wind pressures up to 170% of the code specified 50-year wind pressures. 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 exterior walls and roofing of the building would likely fail first, and 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. The loss of these architectural wall components would decrease the overall wind loading applied to the building and therefore diminish the possibility of damage to the building’s primary structural system. Even with the failure of these interior and exterior wall systems under an extreme wind loading event, the robust construction used to construct BSL-3Ag and BSL-4 spaces, reinforced cast-in-place concrete walls, would resist these wind forces and the primary bio-containment envelope would not be breached. The containment walls will be designed to withstand a 200 mph wind load, which is equivalent to an F3 tornado according to the FEMA Design and Construction Guidance for Community Shelters standards.

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.
Anonymous PD0012, Anonymous PD0012

Page 1 of 1

Hi,

I live in [redacted] Georgia. I'm a private citizen, not connected with anything, but I am totally opposed to having this site here.

[redacted] 2/26/2

Plum Island is a much safer site. I fear for myself and my family. More than that, we are in a serious, serious drought. We can't even flush our toilets. We're restricted with outdoor watering and using our washing machines, etc. The NBAF will need 118,000 gallons of water a day. They will be robbing the citizens of Athens of daily water. Please don't come here. We do not want you.

1/20/2 [redacted]

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

DHS notes the commentor's opposition to the South Milledge Avenue Site in favor of the Plum Island Site Alternative.

DHS notes the commentor's drought concerns and acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site Alternative would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes.
I'm from Kansas, and I'd like to say that I oppose bringing the NBAF to the KSU campus. I do not think it is a safe place to have this facility. Thank you. Bye.
Anonymous PD0014, Anonymous PD0014

Page 1 of 1

July 9, 2008

Hello,

I'm calling because I'm opposed to your having the site here in Athens, Georgia. My friends are opposed. My family is opposed. I'm sure you'll be hearing from them too.

Even David Lee of the University of Georgia, who was gungho on having it here, has said that he favors building the facility on Plains Island because that is safer than having it here in Athens, Georgia.

I live way too close to that facility. I don’t want me or my family or the wildlife at Botanical Gardens harmed in any way.

Your facility is not welcome here. We are in a very serious water shortage crisis. We have a problem with mosquitoes. This is not the place for your facility.

Thank you for your time.

We do not want you here.

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: 19.2
DHS notes the commentor's concerns regarding the proximity of the NBAF to residential areas. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies. These protocols would address emergency response considerations for populations residing within close proximity to the NBAF.

Comment No: 3 Issue Code: 13.2
DHS notes the commentor's concern regarding the proximity of the site to the Botanical Garden. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the 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. 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 Sections 3.8.9, 3.10.9, and 3.14.

Comment No: 4   Issue Code: 12.2
DHS notes the commentor’s concern regarding the proposed water use and existing water supply. Section 3.3 of the NBAF EIS includes an evaluation of infrastructure including potable water, and Section 3.7 includes an evaluation of water resources. As stated in Section 3.3.3.3.1, there is adequate capacity of 43,000,000 gallons per year, but some infrastructure improvements would be required. DHS notes the commentor’s drought concerns and acknowledges current regional drought conditions. As described in Section 3.7.3.3.1, the South Milledge Avenue Site Alternative would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens’ current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes.
Anonymous PD0016, Anonymous PD0016

Page 1 of 1

July 17, 2008

Yes,

I’d like to say that I certainly hope that your organization will be moving to Butner, North Carolina. I think it’ll provide a lot of good jobs for this community, and as a matter of fact, I have members of my family that would like to go to work for you. We have about 20 people in the community that raised cane when the federal prison came in and tried to scare everybody to death and they’re the same people that are trying to do the same thing with your outfit.

God bless you.

Thank you.
DHS notes the commentor’s opposition to the South Milledge Avenue Site Alternative.

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

DHS notes the commentor’s concern regarding human health. A discussion of human health and safety including the potential risk and consequences of an accident occurring at the NBAF is included in Section 3.14. The potential economic effects of an accidental release at the South Milledge Avenue Site are described in Section 3.10.9.1 and Appendix D. As noted, the risks are very low for accidents to occur that would result in an accidental release, and mitigation measures would further reduce the risks.

DHS notes the commentor’s concern. The number of short-term and permanent jobs are discussed in Section 3.10. It is expected that approximately 2,700 direct temporary jobs would result from construction of the NBAF, with many of the jobs being filled locally. Approximately 483 permanent jobs, including the initial 326 direct jobs, would result from operation of the NBAF, with much of the scientific workforce relocating to the region.

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 was evaluated in Section 3.8.9 and Section 3.10.9 of the NBAF EIS as well as in Section 3.14 (Health and Safety).

DHS notes the commentor’s concern. An evaluation of the effects of the NBAF on quality of life resources is included in Section 3.10. A discussion of human health and safety is included in Section 3.14.
DHS notes the commentor's concerns about reliability of electric power to the NBAF. Section 3.3.3 of the NBAF EIS includes an assessment of the current infrastructure at the South Milledge Avenue Site and potential effects from construction and operation of the NBAF. No electric power constraints have been identified for the South Milledge Avenue Site. Should a site be selected for NBAF, any needed infrastructure improvements to ensure service reliability would be identified in accordance with the final facility design.
I would like to register opposition to building a Number Four facility at Plum Island. I think there are still some unanswered questions that still remain with regard to the effect on humans and also I just feel that Plum Island is not a remote location as indicated. It seems like 1.5 miles from Orient Point is not remote. I don’t know how that could possibly be considered remote. And also, I think that the impact upon the land beyond Plum Island needs to have a lot of questions answered about it as well with regards to airborne pathogens and their effect on humans.

So, definitely as a resident of [redacted] I definitely oppose building the Number Four facility at Plum Island.

Thank you.
Yes, I'd like to express my opposition to placing this bio agro defense lab at Kansas State University; Manhattan, Kansas.

There are a number of geographic, geologic faults in the Manhattan area. There's one north of Manhattan - Tuttle Creek Dam - the east end of Tuttle Creek Dam is built right on a fault. There's several other faults to the east of Manhattan, the Lewisville faults and others.

The ground is not...the ground is not...presents a potential hazard for the lab, the large number of foreign students in the area, presents a security risk, I think, and this lab ought to be isolated not in a... for example, where it's located now on Plum Island as opposed to the center of the United States where an accident or a rupture of the facility could contaminate thousands of square miles and result in the deaths of millions of animals and perhaps hundreds of thousands of people.

Thank you.
Hi,

I'm calling to express my concern and my opposition, my strong opposition, to the bio disease lab that is proposed for Butner, North Carolina. I believe it’s NBAF. That just arouses all sorts of concern in me. I worry about contamination to the area. I worry about people becoming ill here, people having to evacuate their homes. I worry about... just mass danger really, to people. I also worry about what it will do to property value. I mean this is a booming area here near RTP, and people love to move here and work here, and property values have held steady here. And I foresee where this could have potentially detrimental effects on property value and that sort of thing. And I just don’t see where...from the article I read in the Independent...how it really would help the State of North Carolina enough to be willing to take on the kind of potential liabilities that that sort of facility in this area could bring.

So I just want to voice my strong opposition to it.

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

Comment No: 1                        Issue Code: 25.1

[*I have lived in Plum Island for 60 years. I oppose the bio safety Level-4 facility on Plum Island.*]
The bio agro defense facility is not wanted in Butner, North Carolina. It will be deadly to
the people and to the area, and the whole southeastern area.
Please no bio agro lab in this area. It is not wanted.
Hi,

I'd like to say that I am not interested in having the bio lab here in North Carolina. Please reconsider and build it somewhere else.

Thank you.
Yes, I am highly opposed to this facility being built in Butner, North Carolina. I think it is bad for the growth of this community. It could actually be of danger to the people. Thank you.
Yes, I live in Kansas and I feel it should be located in Kansas State. It’s wrong for it to be in the center of our country. It’s not a safe place (this phone message is unclear).

Thank you.
August 5, 2008

Yes Sir,

We live in the . We do not need to have Plum Island ignored. It has done well where it is. Keep it at Plum Island. We don’t need it.

Thank you.

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