

Hutson, Martin

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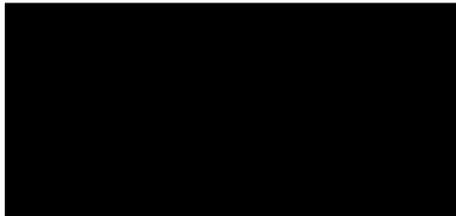
WD0314

From: Hutson, Marty [REDACTED]
Sent: Monday, August 18, 2008 8:21 AM
To: NBAFProgramManager
Subject: Athens, GA

1|24.2 | As a resident of the [REDACTED] I would like to register my support for the Bio Lab and hope that it is placed in Athens. The work in protecting our homeland is of the utmost importance and it should be supported. A vocal minority has made a bit of noise, but it is the same crowd that opposes everything. Please do not let the opinion of the few outweigh the needs of the many.

Thanks for your consideration.

Martin Hutson



Comment No: 1

Issue Code: 24.2

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

Imandt, Robin

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PD0323

August 25, 2008

Good afternoon.

1) 25.1 My name is Robin Imandt. I am a resident of [REDACTED] and I live, I'm going to guess, probably [REDACTED] miles from the Plum Island facility. I am against having it upgraded to a bio safety Level-4 for the following reasons.

2) 21.1 I feel that it can be a terrorist target; being near a nuclear reactor; being on a tip of an
 3) 19.1 island where there is no evacuation possibilities; hurricanes; and even the rising water
 4) 12.1 levels; and I feel that it would be very bad to put something like that on that island where
 boats could get close to the island and create havoc on the island, and create dangers that
 the population would not be able to escape from.

I think that it's a very bad idea to put it on Plum Island, and I am totally against it.

Thank you so much for the opportunity to give a comment.

Bye-bye.

Comment No: 1 Issue Code: 25.1

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

Comment No: 2 Issue Code: 21.1

DHS notes the commentor's concerns regarding the risk of a potential accident or terrorist event. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. Section 3.14 and Appendix E of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The TRA is "For Official Use Only" and is not available for public review. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies.

Comment No: 3 Issue Code: 19.1

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. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Plum Island Site Alternative is provided in Section 3.11.6 of the NBAF EIS. An emergency response plan, which would include area evacuation plans, would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations.

Comment No: 4

Issue Code: 12.1

DHS notes the commentor's concerns with potential island flooding. Sections 3.7.2.1.4 and 3.7.6.3.4 of the NBAF EIS describe the 3 FEMA mapped flood zone categories on Plum Island: Zone X, outside the 100 year floodplain; Zone AE, potentially inundated wetlands within the 100 year floodplain; and Zone VE, coastal inundation from wave influence. FEMA has mapped the PIADC and the potential NBAF Plum Island Site alternative as in category Zone X or outside the 100 year floodplain. Section 3.7.6.3.2 describes attributes of the PIADC's current hazardous weather plan which would be incorporated into the potential construction and operation of the Plum Island Site alternative.

Imbrogno, Bobbi Jo

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WD0257

From: Bobbi Jo Imbrogno [REDACTED]
Sent: Wednesday, August 13, 2008 10:50 PM
To: NBAFProgramManager
Subject: NBAF

1|25.2 |My name is Bobbi Jo Imbrogno and I am writing to you on behalf of my husband and myself
 |voice my opposition to the proposed NBAF in Athens, Georgia.

I was born in Harrisburg, Pennsylvania in 1979, just three weeks after the Three Mile Island near nuclear meltdown. My mother was part of the mandatory evacuation from the area. She has told us for years how even after TMI began venting radioactive material into the air, the general population was assured how safe they were. It is well known in the Central Pennsylvania area that this was not the case: three of my fellow class of 1997 graduates have been treated for thyroid cancer (which usually strikes the elderly, not otherwise healthy twenty year olds) and it was common to be asked by your family physician "You were born in 1979? Were you born in this area?" when your health history was being taken. Every morning I woke up and could see those cooling towers from my bedroom window. They were an ominous reminder of the horrible potential of human error.

I am reminded of the Hebrew proverb, "Man plans, God laughs." The TMI disaster was caused by one faulty gauge in the main control area that allowed the core to overheat. I think it is naive and idealistic to think that in building a facility in which sensitive materials are being handled that all possible contingencies can be conceived of and prepared for in advance. Therefore, I humbly ask that the Department of Homeland Security would recognize their own inherent limits as human beings and place the NBAF in a location in which when an inevitable breach does eventually occur, the damage can be easily contained. Athens, nor any other populated area, does not fit that description. It simply does not make sense to relocate a potentially hazardous, geographically isolated facility to an area populated heavily with both people and livestock.

2|21.0;
 3|5.0

Thank you for your consideration.

--Bobbi Jo Imbrogno

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 21.0

DHS notes the commentor's concern 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 on the U.S.mainland. 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.

Comment No: 3 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 suseptible wildlife species.

Ingle, April

Page 1 of 2

WD0431

From: April Ingle [REDACTED]
Sent: Thursday, August 21, 2008 11:21 AM
To: NBAFProgramManager
Subject: Comments on NBAF - Athens GA

Thank you for the opportunity to comment. These comments are submitted by Georgia River Network in reference to the proposed NBAF site in Athens, GA. Georgia River Network is a statewide organization working to protect and restore rivers across Georgia. We represent over 600 Georgia citizens and 30+ river protection organizations.

As a voice for issues that transcend GA's watersheds we want to comment on several issues that the draft EIS does not adequately address or is insufficient with regards to impacts to the Oconee River and other aquatic resources.

First, due to the size of the facility it is likely that it will result in a large amount of impervious area and therefore a large amount of stormwater. At this time, there are no specific plans that guarantee that stormwater impacts will be mitigated or prevented with installation and maintenance stormwater control practices, with the EIS stating only that they *would be considered or could* be used but not *shall be used*. The EIS cannot conclude that there will be "no direct impact" without these assurances.

1| 12.2 | During construction of the facility there is great potential for erosion and sedimentation of the river, impacting habitat and downstream communities. At this time there are no specific guarantees that erosion and sediment impacts will be mitigated or prevented. The EIS cannot conclude that there will be "no direct impact" without these assurances.

The EIS concludes that there are headwater streams located on the property and that at least some will be impacted. Specifically it states that road and fence construction would affect approximately 50 linear feet of stream, as well as the buffer zone on either side of the stream and would require a Section 404 permit from the USACE, a Section 401 Certification from the state, and a buffer variance from Clarke County. We believe that this qualifies as a "direct impact" and the EIS is in error to conclude that Operations at the proposed NBAF would have "no direct impact" on wetlands or aquatic communities. Research done here at the University of Georgia demonstrates the value of the headwater streams and the need for them to be protected and to avoid further losses. The EIS should also reflect that a buffer variance will also have to be obtained from the state for the 25 foot buffer.

Stormwater and erosion and sedimentation are also stressors to the state listed Altamaha Shiner, which is found in the Middle Oconee River. The EIS cannot conclude that there will be "no direct impact" on federal or state listed species. Due to the probability of increased erosion and sedimentation during construction, and increased stormwater flows once construction is completed, it is likely that there will be a direct impact.

2| 18.2 | We are concerned about the potential of discharge of pollutants from any waste water collection and distribution systems, animal waste pollutants and how animal wastes will be treated and

Comment No: 1 Issue Code: 12.2

DHS notes the commentor's stormwater concerns. The NBAF EIS Section 3.7.3 describes the surface water resources at the South Milledge Avenue Site alternative. Sections 3.7.3.2 and 3.7.3.3 describe potential construction and operational consequences on those resources from the proposed NBAF. As discussed in Chapter 3 Section 3.7.3.3.2, it is anticipated that with the enforcement of all regulations concerning runoff quantity and quality, and the installation of site features designed to address anticipated runoff problems, the NBAF storm water contribution is not anticipated to be substantial; however, the effluent volume and constituents would contribute to the general trend of increased storm water runoff in the ROI.

Comment No: 2 Issue Code: 18.2

DHS notes the commentor's concern. Section 3.13.2.2 of the NBAF EIS addresses the treatment and disposal of animal wastes (e.g., biological liquid waste from BSL-3 Ag areas, animal carcasses) that will be generated by the operation of the NBAF no matter where it is located. Information specific to the treatment and disposal of animal wastes at the South Milledge Avenue Site is located in Section 3.13.4. and Section 3.3.3.3.4 discusses the proposed NBAF's impact on sanitary sewage capacity and operation at the South Milledge Avenue Site. As discussed in Section 3.3.3.3.4, pending revisions to the Athens-Clarke County Sewer Use Ordinance of 2007 would reduce limits for biological oxygen demand (BOD) and total suspended solids (TSS). The NBAF would be designed and operated as necessary to prevent negative impact to the Athens-Clarke County wastewater treatment plant treatment capabilities resulting from flow rate or potentially harmful wastewater constituents.

Ingle, April

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WD0431

2 cont. | 18.2 | disposed of. We are also concerned about the disposal of other wastes, especially hazardous wastes, on site and the potential for contamination of surrounding areas, communities, the river, and downstream communities. As stated in the EIS, parts of the Middle Oconee River and several of its tributaries are already not fully supporting their designated uses due to fecal coliform contamination – an indicator of animal waste and pathogens. The EIS does not adequately address the impacts of waste disposal on the surrounding environment.

3 | 16.2 | The EIS is also incorrect in that it does not reference the impact on recreational resource that the facility will have on our Greenway Network Plan. Our current plans call for trails at this site along the Middle Oconee River and a trail linking it to trails along the North Oconee River which are not referenced in the EIS.

4 | 13.2 | Finally, this facility has potential for high level consumption of natural resources, including water and energy. The EIS does not adequately address how this facility will further impact our community's already limited supply of water, particularly that it appears from the EIS that the facility will result in consumptive use of water meaning that it will use more than it puts back resulting in a net loss of water from the Oconee River and downstream users, homeowners, and lakes. Also, the EIS does not adequately address the large amounts of energy this facility will consume contributing to the widespread impacts from energy generation. The EIS also does not adequately address the impacts of outside lighting to reduce light pollution.

1 cont. | 12.2

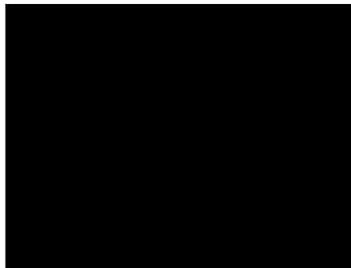
5 | 8.2

6 | 7.2

Thank you for considering our comments.

Sincerely,

April Ingle



Comment No: 3 Issue Code: 16.2

DHS notes the commentor's concern. The potential effects of the population growth associated with the NBAF on the existing recreational facilities was assessed in Section 3.10.3 of the NBAF EIS. The recreational resources within the South Milledge Avenue Study Area would not experience a significant increase in utilization rates as a result of the population increase associated with the NBAF. The study area has abundant recreational resources available.

Comment No: 4 Issue Code: 13.2

DHS notes the commentor's concern regarding potential effects on wetlands, aquatic species, and water quality at the South Milledge Avenue Site. Based on the current preliminary design, construction of the NBAF would directly impact approximately 50 linear feet of stream. DHS appreciates your identification of the error in the first sentence of Section 3.8.3.2.2. This error has been corrected in this Final EIS. As described in Section 3.8.3.2.2, stream impacts would impact aquatic resources within the impacted 50-foot reach. However, a properly designed road crossing would have little or no adverse effect on downstream aquatic resources. The impacted stream, which extends into the fenced pasture, has been severely impacted by loss of buffering vegetation and erosion and sedimentation. No wetlands would be impacted at the South Milledge Avenue Site. During the final design phase, impacts to wetlands and waters of the U.S. will be avoided if possible, minimized if unavoidable, and as a last resort mitigated through creation, restoration, banking and other means in consultation with U.S. Army Corps local District. If unavoidable stream impacts remain, DHS would provide mitigation such as restoration of the unaffected stream segments. As described in Section 3.8.3.2.3, best management practices and requirements for a stormwater pollution prevention plan would mitigate potential erosion and sedimentation impacts during the construction process. As described in Section 3.8.3.3.3, low impact design (LID) features would be used to minimize the potential for adverse impacts associated with stormwater runoff from the completed facility. Preliminary LID measures that are being considered include pervious pavement in both parking lots and pedestrian walkways, capturing and using roof runoff for landscape watering, and grading parking lots to filter storm water through landscaped areas. As described in Section 3.3.3.1.4, sewage acceptance criteria and pretreatment requirements would apply to the wastewater discharged from the proposed NBAF. The Athens-Clarke County Sewer Use Ordinance of 2007 provides limits on specific pollutant discharges to the Middle Oconee Wastewater Treatment Facility. The NBAF would be designed and operated as necessary to comply with Athens-Clarke County Middle Oconee Wastewater Treatment Facility criteria and avoid the discharge of potentially harmful wastewater constituents. Implementation of approved erosion control measures, utilization of LID storm water pollution prevention measures, and compliance with wastewater treatment standards would prevent significant impacts on downstream aquatic resources such as the Middle Oconee River. Therefore, the Altamaha shiner is not likely to be adversely affected by the NBAF.

Comment No: 5 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes. As discussed in Chapter 3 Section 3.7.3.3.2, it is anticipated that with the enforcement of all regulations concerning runoff quantity and quality, and the installation of site features designed to address anticipated runoff problems, the NBAF stormwater contribution is not anticipated to be substantial; however, the effluent volume and constituents would contribute to the general trend of increased stormwater runoff in the region.

Comment No: 6 Issue Code: 8.2

DHS notes the commentor's concerns about the impact of electric power consumption by the NBAF operation at the Umstead Research Farm Site Alternative. Section 3.3.7 of the NBAF EIS includes an assessment of the current electrical power infrastructure at the Umstead Research Farm Site, the potential impact and effects from construction and operation of the NBAF, and annual electrical power usage projections.

Comment No: 7 Issue Code: 7.2

DHS notes the commentor's concern regarding light pollution at the South Milledge Avenue Site. Nighttime lighting could be mitigated with the use of shielded lighting and/or shielded fixtures that direct light downwards and can be used to keep light within the boundaries of the site and use of the minimum intensity of lighting that is necessary to provide adequate security.

Irvine, James

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PD0197

August 22, 2008

1| 25.4

Yes. This is James Irvine. I live in [REDACTED] Kansas and I am definitely against bringing that lab to Manhattan or Kansas State College because I have agricultural and other things that I don't think it's a good thing for this area. So I vote no. Don't put it here.

Thank you. Bye.

Comment No: 1

Issue Code: 25.4

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

Irvine, John

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08/25/2008 10:23 FAX 785 539 2358

IRVINE REAL ESTATE

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FD0084

1) 25.4 As a rancher and concerned citizen I strongly oppose the locating of NBAF in Manhattan, Kansas.
 2) 21.4 I am the sixth generation of my family to live in the Manhattan area. I hope my children and
 3) 15.4 grandchildren can live and thrive here as past generations have, in safety and security. I view
 NBAF as a threat to the safety of my family and the security of our livelihood.

4) 21.4 If there were a 100% guarantee that there would never have a leak, I would support bringing the
 research to Manhattan. Additionally, I wholeheartedly respect and admire those who research
 deadly pathogens for the common good. Anyone willing to risk their own safety for the benefit of
 others defines altruism. However, the risk of a pathogenic release from this facility is possible.
 Due to the fact that NBAF poses such risk to that which it strives to protect, the Manhattan
 location is not appropriate.

5) 21.4 Representatives of Kansas State University advocating NBAF siting in Manhattan stated that, "In
 the interest of intellectual honesty..." they were unable to assure that there would never be a
 release of pathogens from the facility. Instead they talk about how much our technology has
 advanced in bio-research facilities. I am not convinced by this idealism that technology has
 advanced to a point that human error, mechanical failure, and acts of God are a thing of the past.
 Furthermore, as greater numbers of individuals work with these pathogens, so to increases the
 probability of another Bruce Ivins.

3 cont.) 15.4 As a cattleman, our business is already difficult; why would we voluntarily expose ourselves to
 another risk. It is easy for those promoting the facility to argue for the Kansas site because their
 livelihoods are not at stake. There are half a million cattle within a short drive of Manhattan and
 millions of head within the State of Kansas. Bringing Foot and Mouth Disease into the heart of
 cattle country is simply put, a bad idea. One only has to look at the misery and economic loss
 FMD caused in Great Britain. The U.S. beef industry is still suffering the effects of a single case
 of BSE in 2003. Export markets comprise a portion of U.S. beef sales. When we lose export
 markets, our industry loses its profit margin. Not only would our export markets suffer from a
 release, domestic consumers of beef will also pull back.

1 cont.) 25.4 The support of bringing NBAF to Manhattan for the most part is not local. Tom Thornton,
 President and CEO of the Kansas Bioscience Authority and NBAF "in Manhattan" advocate, in a
 recent letter to the Manhattan Mercury, conveyed a message that support is wide and deep in the
 Kansas community for NBAF. I disagree with this representation. Support is deep with those
 hungry for the dollars, jobs, and prestige. Beyond that, there is little width to the support. I was
 part of a petition drive that generated 1000 signatures opposing NBAF in Kansas, all within the
 past 2 weeks. If this drive were started a year ago, DHS would see many times that number.
 Getting signatures was about as difficult as giving away ice cream on a hot summer day. Those in
 our local and surrounding area do not want to share our community with these diseases affecting
 both animals and humans.

Should there ever be a release from a local facility people like Mr. Thornton, who moved here
 from Illinois two years ago, will pack up and leave. Those of us who have built our lives here are
 the ones who would suffer. Who's voice should receive more weight?

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern. The risk of an accidental release of a pathogen is extremely
 low. Risks to human populations at each alternative site were evaluated and discussed in Section
 3.14 and Appendix E of the NBAF EIS. The economic effects of an accidental release are presented
 in Section 3.10.9 of the NBAF EIS. The economic impact of an outbreak of foot and mouth disease
 virus has been previously studied and could result in a loss of \$4.2 billion in the Manhattan, Kansas
 area over an extended period of time. The economic loss is mainly due to foreign bans on U.S.
 livestock products. Should the NBAF Record of Decision call for the design, construction, and
 operations of the NBAF at the Manhattan Campus Site, site specific protocols would then be
 developed in coordination with local emergency response agencies and would consider the diversity
 and density of populations residing within the local area, to include agricultural livestock. DHS would
 have site-specific standard operating procedures and emergency response plans in place prior to the
 initiation of research activities at the proposed NBAF. Emergency response plans will include the
 current USDA emergency response plan for foot and mouth disease (FMD) which includes
 compensation for livestock losses. FMD is not a public health threat. Cats, dogs, birds and other non-
 cloven hoofed household pets are also not affected by FMD.

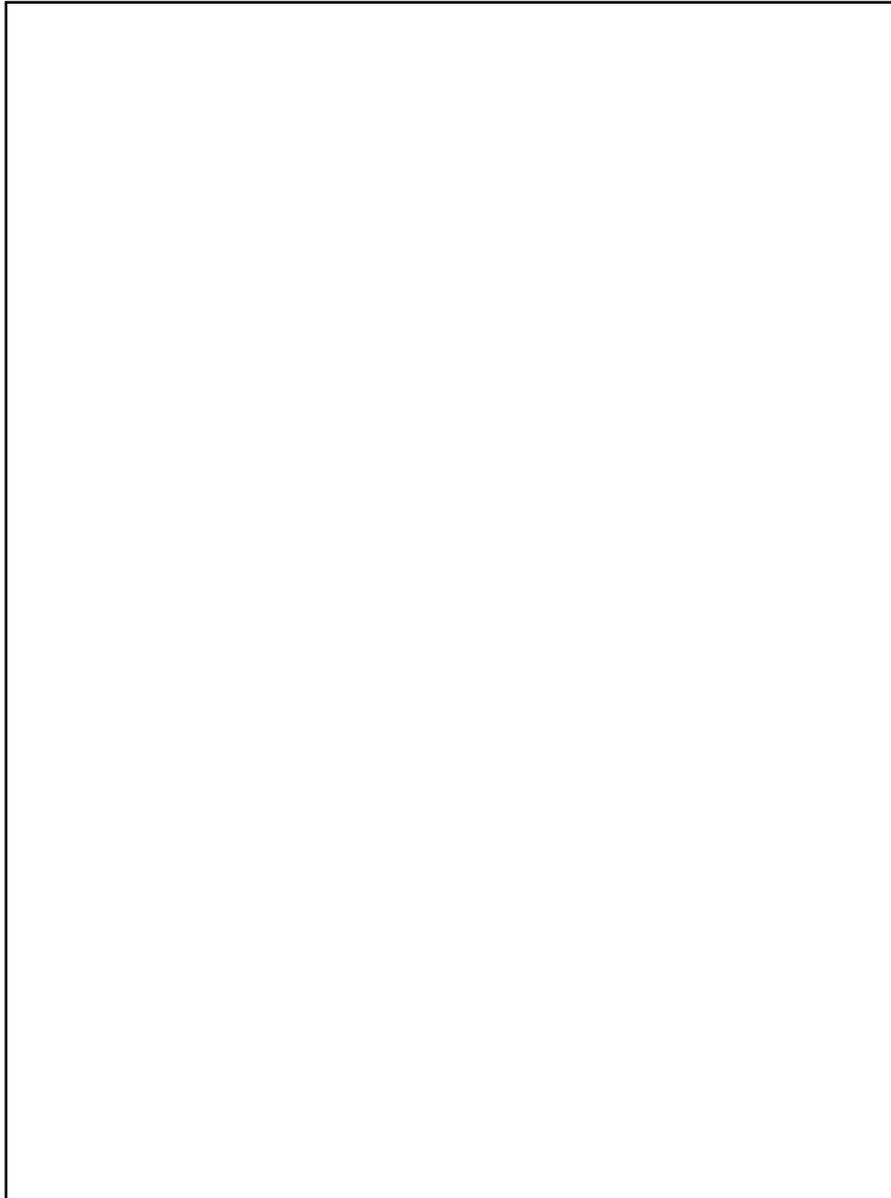
Comment No: 3 Issue Code: 15.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative. A discussion of
 health and safety is included in Section 3.14 of the NBAF EIS. Risks of accidental pathogen release
 were found to be low at all site alternatives. In the event of an FMD outbreak, severe economic
 impacts are anticipated due to disease control measures, and temporary export bans of meat and
 animal products. The potential effects to livestock-related industries is discussed in Section 3.10.9
 and Appendix D of the NBAF EIS. The primary economic effect of an accidental release would be the
 banning of U.S. livestock products regardless of the location of the accidental release, which could
 reach as high as \$4.2 billion nationally until the U.S. was declared foreign animal disease free.

Comment No: 4 Issue Code: 21.4

DHS acknowledges commentor's statement that safety at the NBAF is not guaranteed. DHS also
 notes that the risk of an accidental release of a pathogen from the NBAF is extremely low. 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.

Comment No: 5 Issue Code: 21.4



DHS notes the commentor's concern regarding the possible of accidental release. 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. As described in Section 2.2 of the NBAF EIS, 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 NBAF would be equipped to withstand the normal meteorological conditions that are present within the geographic area of the selected site. 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.

Irvine, Marlene

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

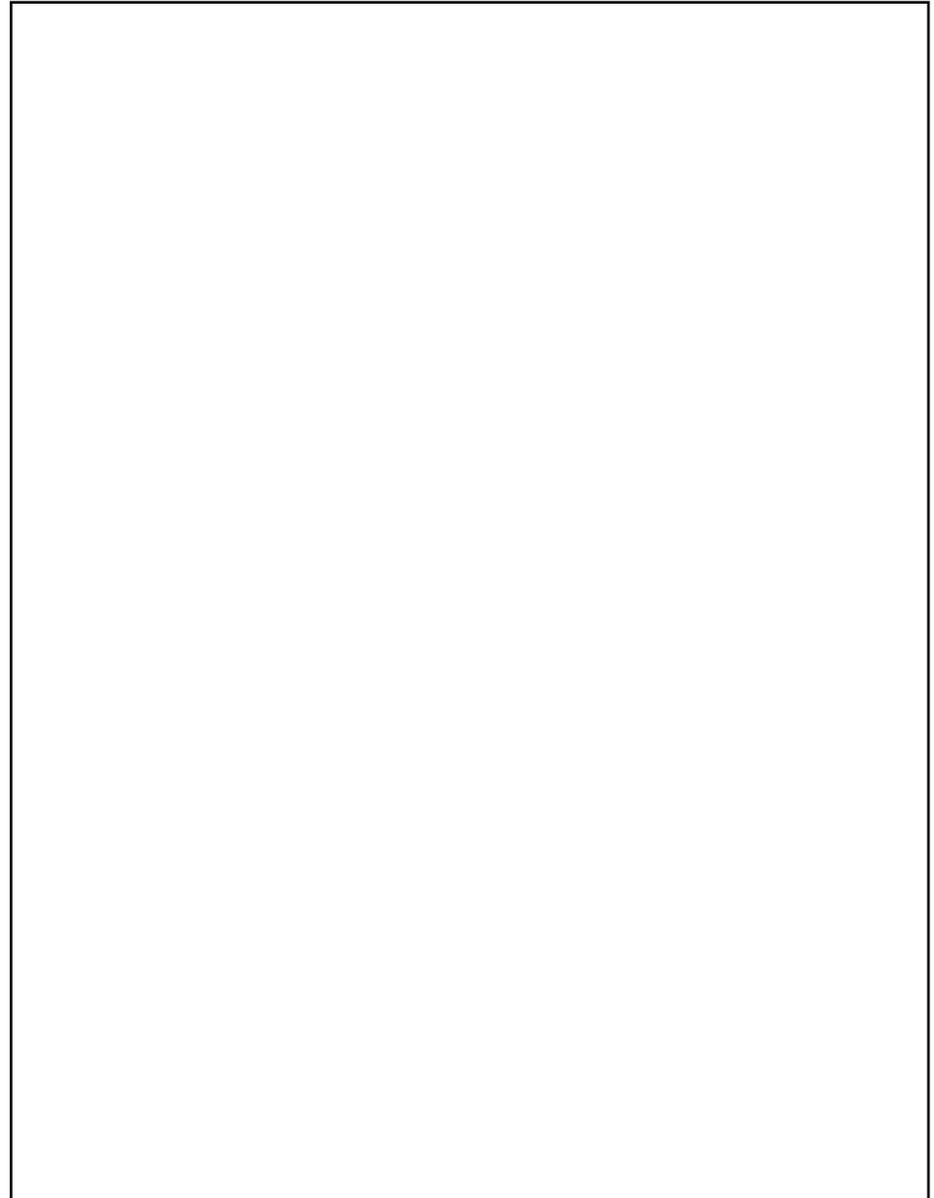
Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.

Name: Marlene Irvine
Title: concerned citizen in Manhattan, KS
Organization: _____
Address: _____
City: _____ State: KS Zip Code: _____

Comments:
see 4 pages following
Thank you

(Continued on back for your convenience)

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

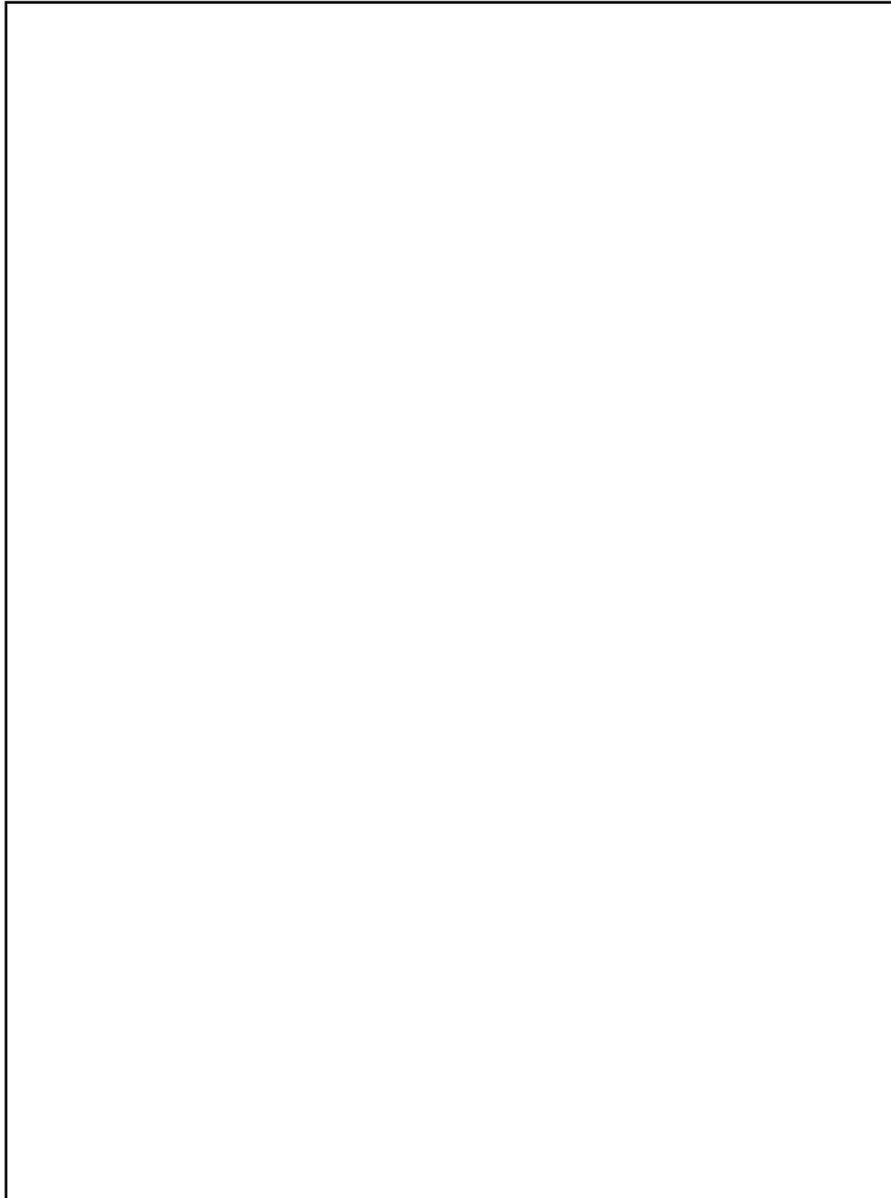


Irvine, Marlene

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| 08/25/2008 23:52 FAX 785 539 2356 | | IRVINE REAL ESTATE | 002 |
| | | | FD0088 |
| 1 25.4 | | I am writing to express my extreme opposition to the proposed NBAF in Manhattan, KS. In fact I think the responsible thing to do is to keep it where it is. I realize the cost will be more initially. However, the cost of a leak could be disastrous. I have former clients that live in New Rochelle, NY. They have a boat that they take to the Ocean. When I told them of the proposed NBAF, they look so funny! They both immediately said, "Why would they bring it to a populated area?" They told me that when they boat they have to stay far away and no one can fly over the facility. My former client added, "My son will be long gone before it comes here, if it does." "They just want to bring it to an area where there is not any opposition, it's the easiest." Well, there is opposition! | |
| 2 15.0 | | | |
| 3 5.0 | | | |
| | | My best friend's daughter saw my parents at the NBAF meeting held at Kansas State University. She informed me that it was the first time she had ever heard opposition. There were University meeting and preparation, given same amount of time and preparation as the University, the opposition would have appeared huge! The educated in this matter have scrambled to inform as many as possible in a short period of time. I heard comments like, "You have got to be kidding." Most people are too busy to take time to read outside of their profession. In addition, there are many people that would like to oppose and would oppose if the decision is to come to Manhattan, they simply fear the repercussions of having their name out there before it is really necessary. They feel a strong sense of intimidation they have families to provide for. | |
| 4 4.0 | | | |
| | | There are two excellent examples that I can initially think of as a way of expressing concern for the security aspect: Dr. Bruce Ivens and an MIT-educated Pakistani, know as, Aafia Siddiqui . We educated Aafia Siddiqui, as we would educate many others. I do not find a problem with this. However I do have a problem with security. If the trade Center can be destroyed with as much security as there was in that location, Manhattan, Kansas, would be disastrous! We do not have any barriers like Plum Island. Our lives are just as important as the decision makers of this proposed NBAF Lab. Many of | |
| 5 21.4 | | | |

| | |
|---|------------------|
| Comment No: 1 | Issue Code: 25.4 |
| DHS notes the commentor's opposition to the Manhattan Campus Site Alternative. | |
| Comment No: 2 | Issue Code: 15.0 |
| DHS notes the commentors concerns. The potential economic effects of an accidental release are discussed in Section 3.10.9 and Appendix D of the NBAF EIS. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the economic effect would be significant for all sites. | |
| Comment No: 3 | Issue Code: 5.0 |
| As described in Section 2.3.1 of the NBAF EIS, 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. Nevertheless, it has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. | |
| Comment No: 4 | Issue Code: 4.0 |
| DHS notes the commentor's concern regarding perceived coercion of local residents. DHS is committed to free and open public involvement during development of the NBAF EIS and welcomes comments. The decision on whether or not the NBAF is built and, if so, where it will be built, will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment. The DHS Under Secretary for Science and Technology Jay M. Cohen, with other department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published. | |
| Comment No: 5 | Issue Code: 21.4 |
| DHS notes the commentor's concern about intentional subversive acts. 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. 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. 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.

Irvine, Marlene

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08/25/2008 23:53 FAX 785 539 2358

IRVINE REAL ESTATE

003
FD0088

the people that want to bring this facility to Manhattan, Kansas have dollar signs in mind for their personal gain, not the common desires for the continued success of Manhattan, Kansas and The United States of America.

I have additional concerns:

6| 18.4

It is commonly known that the City of Manhattan has had sewage problems. The sewage from the proposed NBAF could not be handled. There are certain streets in the "Northview" subdivision that have constant sewage backups in the basements or sub-grade apartment levels. When this problem occurs, the City dumps the raw sewage into the storm drains. The storm drains go to the river and service the Topeka and Lawrence, Kansas drinking water supply. Would you drink this water? This is already a bad situation, which could be made disastrous. In fact, with our last water bill we received a pamphlet titled: "How to Prevent Sewer Backups". This is a situation where a select few are trying to add more problems before fixing the existing problems. At Plum Island, the disposed research items are allowed to disperse in a greater body of water, without a concern for sewage backups.

7| 11.4

As I write, our Tuttle Creek Reservoir is being "earth quake" strengthened, another reason to keep this facility out of Manhattan, Kansas.

1 cont.| 25.4

While I agree that this research is needed, it would be foolish to think we don't need research, not here in Manhattan, Kansas or anywhere on the mainland!

Comment No: 6 Issue Code: 18.4

DHS agrees that existing infrastructure at any chosen NBAF location has to be adequate to handle proposed NBAF operations. Section 3.3.4.3.4 of the NBAF EIS explains that the City of Manhattan, Kansas is currently designing a new wastewater treatment plant and that the wastewater discharge projections for the proposed NBAF are being incorporated into the design criteria for the new plant. As discussed in this section, the NBAF would be designed and operated as necessary to prevent negative impact from either flow rate or constituents to the capabilities of the City of Manhattan wastewater treatment plant.

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. 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.

Irvine, Marlene

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08/25/2008 23:54 FAX 785 539 2358 IRVINE REAL ESTATE 004

FOXNews.com - Pakistani Woman Extradited to New York for Alleged Attack on U.S. Soldiers ... Page 4 of 3

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There is not enough security for this women U.S. in Kansas!

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NEW YORK — An MIT-educated Pakistani woman once identified as a possible Al Qaeda associate has been brought to New York to face charges she tried to kill U.S. agents and military officers during an interrogation in Afghanistan, federal prosecutors said.

Aafia Siddiqui, who was shot and wounded last month during the confrontation, was expected to be arraigned Tuesday in federal court in Manhattan on charges of attempted murder and assault, U.S. Attorney Michael Garcia said in a statement. A lawyer for her family said the allegations are false.

Siddiqui, 38, was stopped by police on July 17 outside a government building in central Afghanistan's Shabari province, according to a spinning campaign. Police searched her handbag and discovered documents containing recipes for explosives and 27 critical weapons and identifying "various landmarks in the United States, including New York City," according to the complaint, which did not identify the landmarks.

Police also found maps of Ghazni on her, including the provincial governor's compound and the mosque he prayed in, said governor spokesman Sayed Ismail Jahanfar.

Siddiqui also was carrying "chemical substances in gel and liquid form that were sealed in bottles and glass jars," the complaint said. It did not elaborate. Jahanfar said she was carrying "liquid soap."

The next day, six teams of FBI agents and U.S. military officers prepared to question her, Siddiqui grabbed a rifle, pointed it at an Army captain and yelled that she wanted to leave, prosecutors said. An interpreter pushed her rifle aside as she fired two shots, which missed, they said. One of two shots fired by a soldier in response hit her in the torso.

Even after being hit, Siddiqui struggled and shouted in English "that she wanted to kill Americans" before the officers subdued her, the complaint said.

Authorities believe she fled the country from Pakistan, crossing the border at Chaman border post into the southern Kandahar province, he said. She spent two days in Kabul before going to Ghazni.

The family attorney, Elaine Whitfield Sharp, called the charges "a tall story."

Sharp disputed the U.S. government's earlier claims that Siddiqui had gone underground for several years before her capture. The family suspects that after she was shot with her three children who in "August of 2003, she was secretly held and possibly tortured before U.S. authorities finally brought charges to justify her detention.

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Comment No: 8 Issue Code: 27.0
DHS notes the information provided by the commenter.

8/27.0

Irvine, Marlene

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08/25/2006 23:55 FAX 785 539 2358 IRVINE REAL ESTATE Q 005
 FOXNews.com - Pakistani Woman Extradited to New York for Alleged Attack on U.S. Soldiers ... Page 2 of 3

"I believe she's become a terrible embarrassment to them, but she's not a 'terrorist,' Sharq said. 'If or if she comes out, people will see she did nothing wrong.'"

At the time of the incident, Afghan officials gave conflicting accounts of what transpired between Siddiqui and the U.S. interrogators.

Gen. Khan Mohammad Mujizat, police chief in central Ghazni province, initially said police argued with the Americans over giving up custody of Siddiqui. But he later said there was no argument and that the woman snuggled at one of the U.S. soldiers, drawing the general's attention.

U.S. military officials declined comment at the time.

On Tuesday, an Afghan official in Ghazni said the woman took the weapon while U.S. officials were arguing with Afghan security officials over the custody rights. The official spoke on condition of anonymity because he was not authorized to speak about the case.

At a 2004 news conference, then-Attorney General John Ashcroft and FBI Director Robert Mueller II identified Siddiqui as one of seven people the FBI wanted to question about the suspected ties to Al Qaeda.

U.S. authorities said at the time that Siddiqui had received a biology degree from the Massachusetts Institute of Technology and was a doctoral student in neurobiological sciences at Brandeis University, outside Boston, in 2001 before returning to Pakistan shortly after Sept. 11.

Though they never alleged she was a full-fledged member of Al Qaeda, authorities said they believed Siddiqui could be a "liar," someone with knowledge of the United States who supported other operatives trying to slip into the country and plot attacks.

Siddiqui is charged with one count each of attempted murder and assault. If convicted, she faces up to 20 years in prison on each charge.

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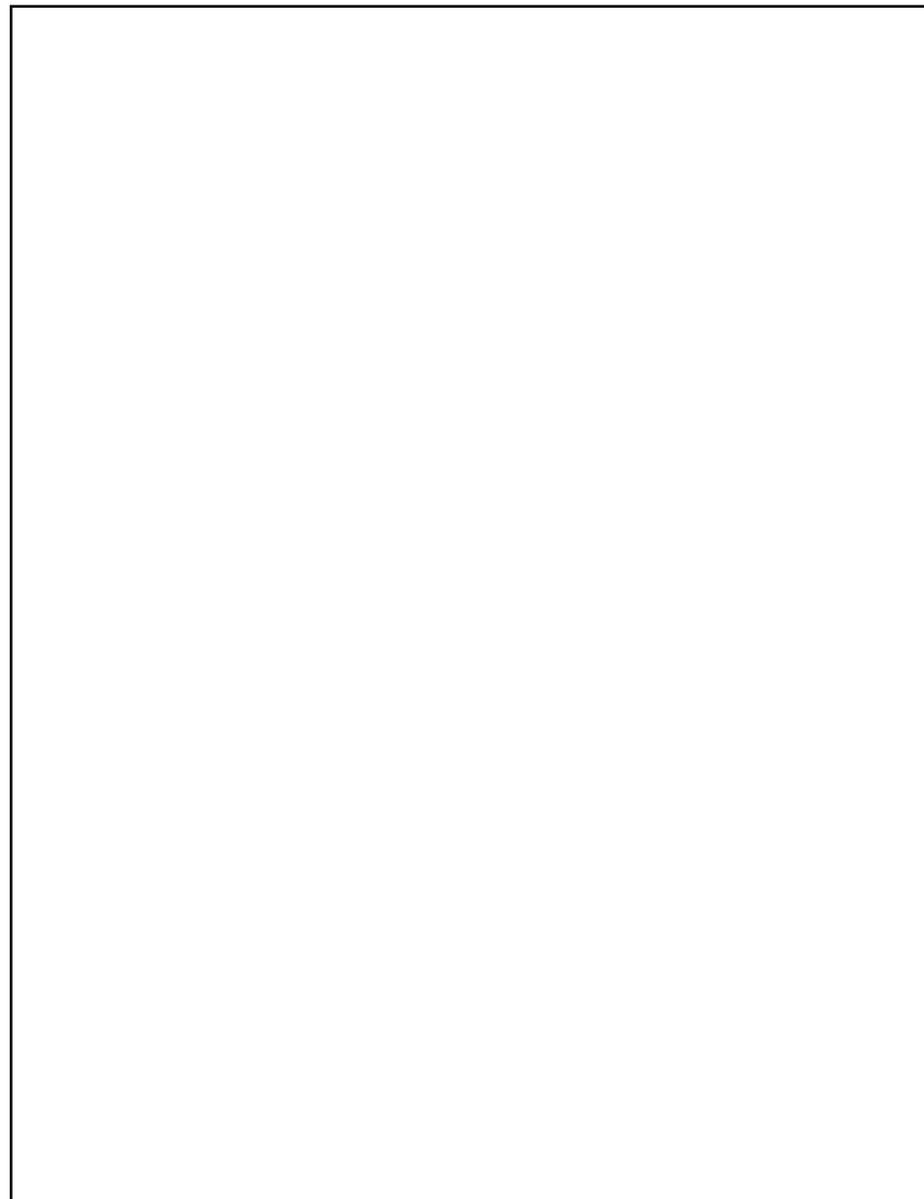
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Irvine, Mary Beth

Page 1 of 3

07/31/2008 12:43 FAX [REDACTED] 001
FD0007

[REDACTED]

FAX TRANSMISSION REPORT

DATE: 7/31/08

TO: NBAF

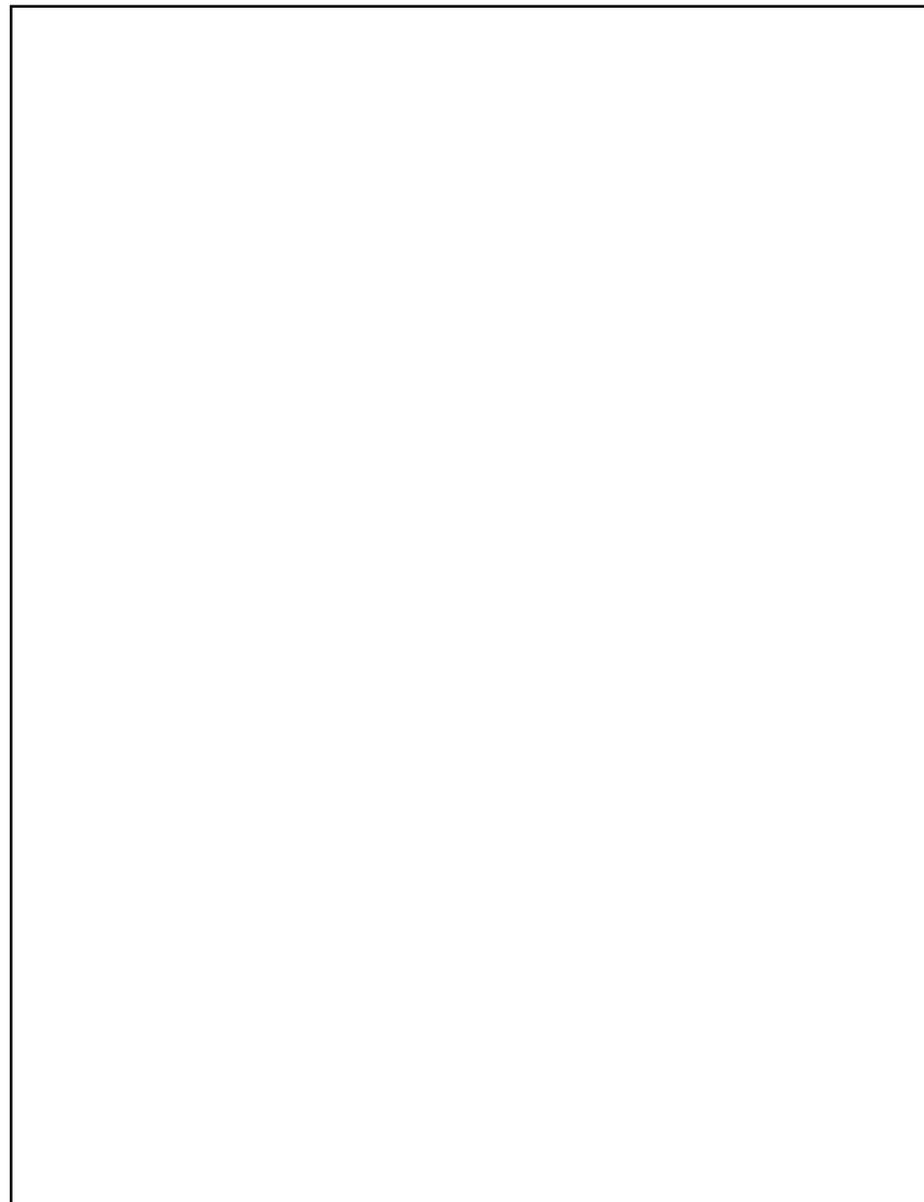
FROM: MARY BETH IRVINE

FAX NUMBER: 1-866-508-6223

NUMBER OF PAGES INCLUDING COVER: 3

COMMENTS: _____

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Irvine, Mary Beth

Page 2 of 3

07/31/2008 12:44 FAX [REDACTED]

002

FD0007

1| 25.4

I am writing to express my strong opposition of the NBAF facility at Manhattan, Kansas. We live within three miles of this proposed facility with our registered cattle and farming operation.

My husband and I are both third generation farm families and we have two sons involved with our operation. We also have a daughter and son-in-law who have a cattle and farming operation a short distance from Manhattan. Our sons have children who also have a strong desire to continue this heritage that mean so much to our family.

I cannot believe that such a facility would be located at Kansas State University, a agriculture school, where all six (6) of our children received their education and graduated with great pride. We worked hard to educate our children and they graduated without grants, student loans, etc. due to our hard work as a farm family. Now you are proposing to completely devastate families such as ours who are trying hard to make a living in this great state of Kansas.

2| 21.4

I understand that your proposal facility is supposed to be built sound but there is absolutely no guarantee for human error or acts of God that could happen. Only God knows the problems that could occur. We all know the problems that have occurred in New York on Plum Island. I am sure that facility was also built to be secure. In Kansas we cannot risk problems that could occur such as those that have occurred in the Plum Island facility.

3| 15.4

I understand also that this proposed facility according to our state and local officials are dreaming of an economic boom to our area and to the state. I believe they should also be aware that a leak in this facility could also lead to an economic disaster not only to our state but to the United States as well. We do not need this facility in

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 acknowledges commentor's statement that safety at the NBAF is not guaranteed. DHS also notes that the risk of an accidental release of a pathogen from the NBAF is extremely low. 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. As described in Section 2.2 of the NBAF EIS, 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 NBAF would be equipped to withstand the normal meteorological conditions that are present within the geographic area of the selected site. All laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Training and inherent biocontainment safeguards reduce the likelihood of a release.

Comment No: 3

Issue Code: 15.4

DHS notes the commentor's concern. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively.

Irvine, Mary Beth

Page 3 of 3

07/31/2008 12:44 FAX [REDACTED] 003
FD0007

4| 19.4 | Manhattan or any other state that would jeopardize the animal industry or the risk that
5| 24.1 | could occur with human diseases. It should be isolated on Plum Island or another area
6| 5.0 | that would be similar.

Mary Beth Irvine

[REDACTED] KS [REDACTED]

Comment No: 4 Issue Code: 19.4
DHS notes the commentor's concern. Risks to human populations at each alternative site were evaluated and discussed in Section 3.14 and Appendix E of the NBAF EIS. The risk of an accidental release of a pathogen from the NBAF is extremely low.

Comment No: 5 Issue Code: 24.1
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative.

Comment No: 6 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives and support for the Plum Island Site Alternative or similar location.

Irvine, Paul

Page 1 of 1

PD0050

August 8, 2008

Yes,

1|25.4 | This is Paul Irvine at ██████████ Kansas, and I am very concerned with this proposition that the NBAF be located in Manhattan, right in the middle of cattle country. I think that does not even exhibit any common sense whatsoever. And, according to the GAO report that I have received, they do not suggest that it should ever be put on a mainland of the United States.

2|21.4 | I also have a serious problem with the idea that in light of this person that had access to the anthrax and spread it out and killed five people, and has subsequently committed suicide, and if we get some mentally deranged person in there or someone with a mental problem or any other kind of a problem that could be very detrimental, and they could take this out of the lab or accidentally, or on purpose, and spread it around and cause a serious, serious problem.

And with that, I would thank you very much for your time.

1 cont. | Please do not put NBAF in the middle of the heart of cattle country. That would be a
25.4 | total disaster. It's unbelievable that they would even consider that.

Thank you very much.

Good bye.

Comment No: 1 Issue Code: 25.4

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

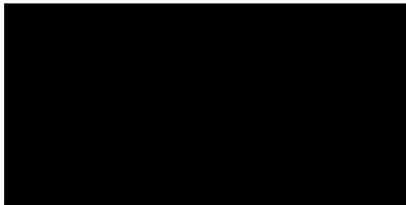
Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern regarding a criminal action perpetrated by an NBAF employee. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The TRA is "For Official Use Only" and is not available for public review. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Section 3.14 of the NBAF EIS investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release 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. As further set out in Section 3.14.3.4, all employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures.

Irvine, Paul

Page 1 of 3

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DATE: 8/20/08

TO: DEPARTMENT OF HOMELAND SECURITY

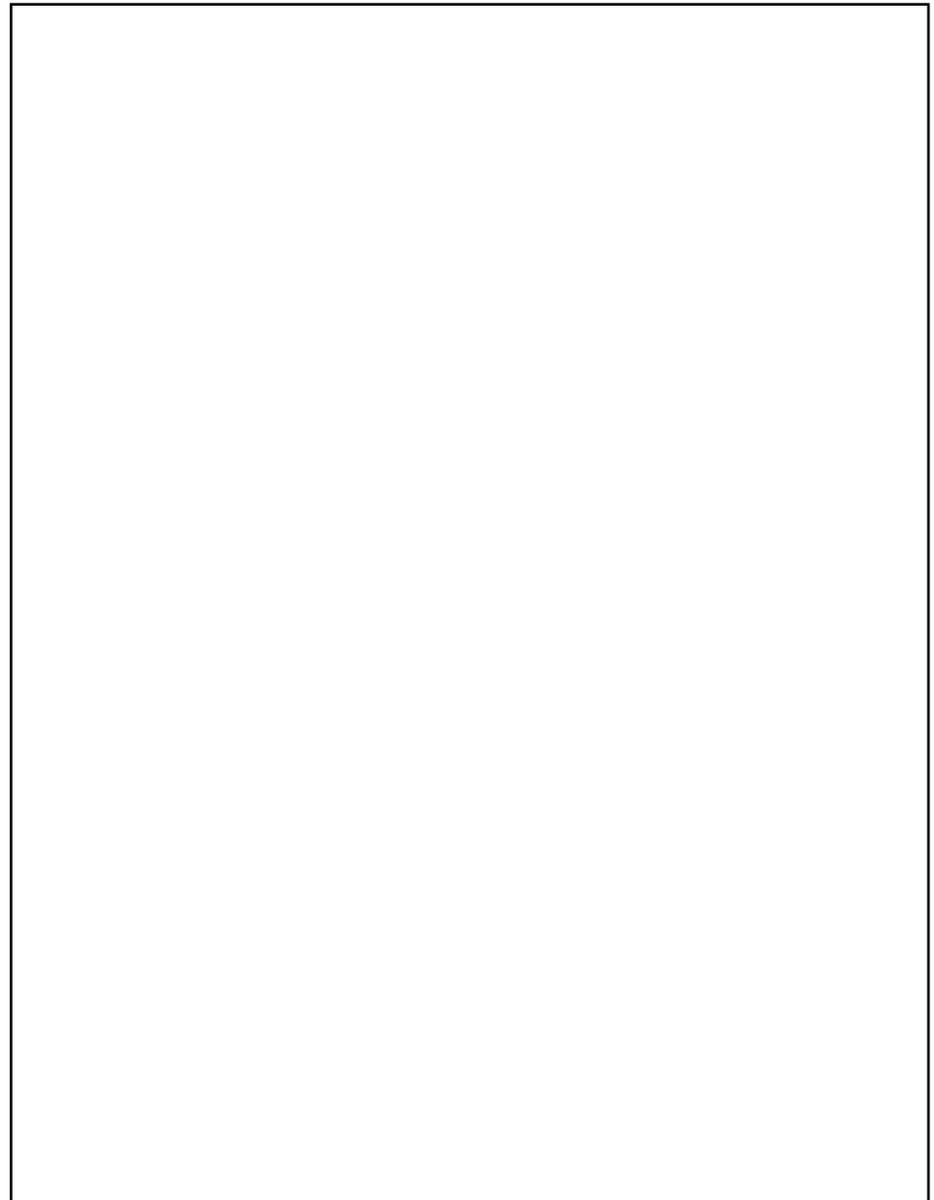
FROM: PAUL IRVINE

FAX NUMBER: 1-866-508-NBAF

NUMBER OF PAGES INCLUDING COVER: 3

COMMENTS: HERE'S THE LETTER IN OPPOSITION TO THE NBAF FACILITY
PERIODIC IN MANHATTAN, KS.

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Irvine, Paul

Page 2 of 3

08/20/2008 16:11 FAX 785 539 2358 IRVINE REAL ESTATE 002 FD0029

NATIONAL BIO AND AGRO-DEFENSE FACILITY
Draft Environmental Impact Statement
Comment Form

DEPARTMENT OF
 HAWAII
 LAND SECURITY

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: Don Whiffon & Ade Whiffon
 Title: Private Citizens
 Organization: N/A
 Address: [Redacted]
 City: [Redacted] State: KS Zip Code: [Redacted]

Comments: We oppose the installation of the National Bio-Agro-Defense Facility on Mainland Kansas. The consequence of a security failure dominates all the advantages the NBAF holds. NBAF has apparently failed to properly maintain its building. Maintenance in its self a safety factor. Would there be an emergency? We must consider & analyze the population's pros & cons. The Manhattan, Kansas, a very favorable reception of NBAF's location at KSU. Analyze this, 90% of those taking part in the evening's programs, were directly or indirectly involved in the local infrastructure of the City, Country, state, national & on the KSU. This group focused on

1| 25.0
 2| 5.0
 3| 21.0
 4| 23.0
 5| 4.4

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

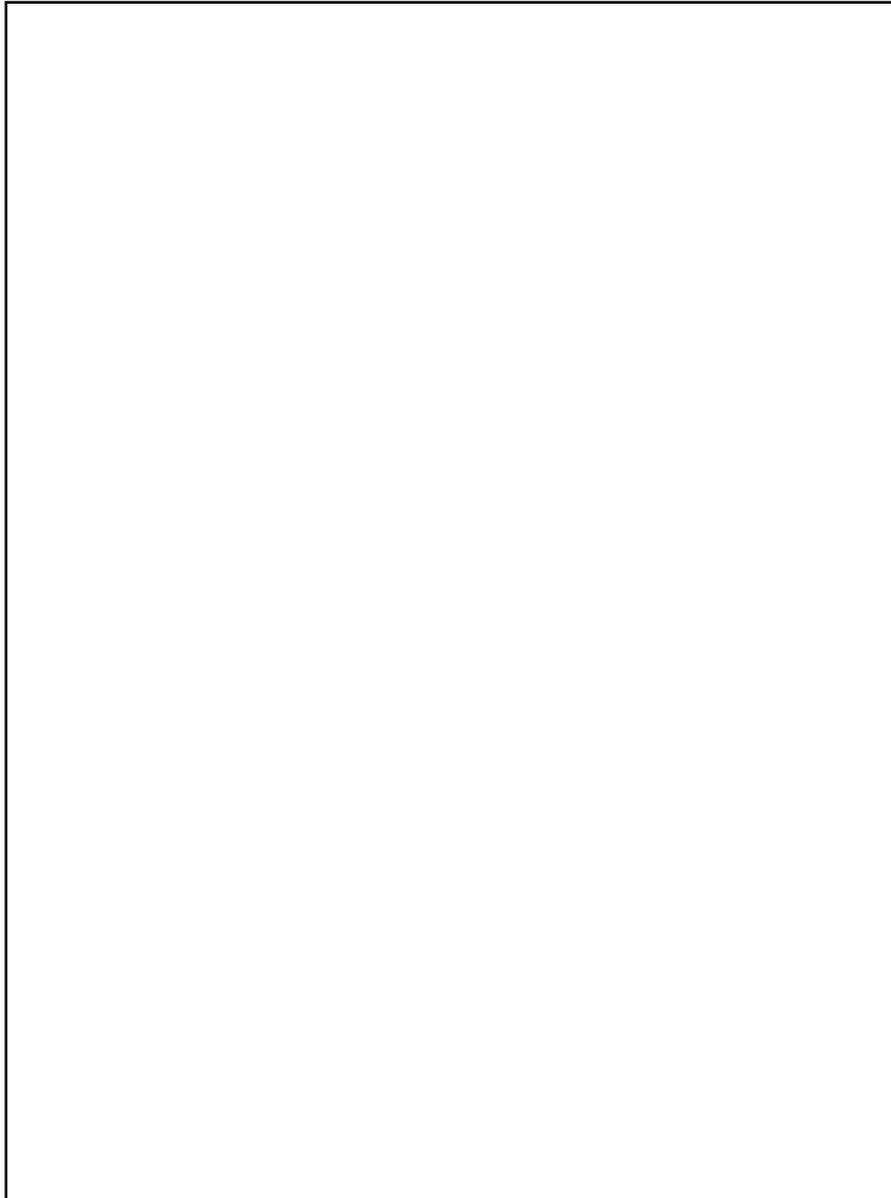
(Continued on back for your convenience)

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

Comment No: 2 Issue Code: 5.0
 DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 21.0
 DHS notes the commentor's 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, including releases due to weather events. 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, including institutionalized populations, residing within the local 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.

Comment No: 4 Issue Code: 23.0
 DHS notes the commentor's statement regarding the importance of long term maintenance to the safety of the NBAF operation. DHS would maintain the NBAF and ancillary facilities in compliance with applicable environmental, safety, and health requirements and provide adequate funding for safe operation and long-term maintenance.



Comment No: 5 Issue Code: 4.4
DHS notes the commentor's opinion. DHS is committed to free and open public involvement during development of the NBAF EIS and welcomes comments. DHS's decisions on whether the NBAF should be built, and, if so where, will be based on environmental analyses, public and agency comments, mission requirements, national policy considerations, life-cycle costs, site characterization, security, and other programmatic considerations.

Irvine, Paul

Page 3 of 3

08/20/2008 16:13 FAX 785 539 2358 IRVINE REAL ESTATE 003
 FD0029

5 cont. 4.7
 6) 23.4

Contributions to the local economy, the number one priority. Not a conducive factor for retired & working class Americans. This lab will fall in the category of "Level 4" right now. This "right now" was expressed at meeting. This to me indicates this level 4 is only a starting point with all intentions of going to a higher level that resembles "right now". I question and every concerned citizen should too.

(Signature)
 Ada L. Whitton

THANK YOU FOR YOUR COMMENTS

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

| | |
|---|--|
| <p>U.S. MAIL</p> <p>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</p> | <p>TOLL-FREE FAX</p> <p>1-866-508-NBAF (6223)</p> |
|---|--|

Comment No: 6 Issue Code: 23.0

DHS notes the commentor's concern regarding the biosafety level of facilities within the NBAF operation. Chapter 1, Section 1.1 identifies the NBAF as a high containment facility (including BSL-3 and BSL-4) to safely and effectively address the accidental or intentional introduction into the U.S. of animal disease of high consequence. A listing and definition of the four levels of biosafety facilities are also included in Chapter 1, Section 1.1 of the NBAF EIS. If, in the future, any proposed research at the laboratory would exceed the parameters studied in this EIS, supplemental analysis under NEPA would be undertaken.

Isaac, Yvonne

Page 1 of 1

WD0681

From: Yvonne Isaac [REDACTED]
Sent: Monday, August 25, 2008 9:31 AM
To: NBAFProgramManager
Subject: National Bio and Agro-Defense Facility (NBAF) - Flora, MS

1|24.5
Gentlemen - My firm has recently opened a Southern branch office in [REDACTED] MS. We have done so not only to support our development project, Old Capitol Green, but because we believe in the State of Mississippi and it's ability to create sustainable development and opportunities for its citizens. We heartily and enthusiastically support the location of the National Bio and Agro-Defense Facility (NBAF) in Flora, MS.

Yvonne R. Isaac
[REDACTED]

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

Isshak, Andrea

Page 1 of 1

WD0047

From: Andrea Isshak [REDACTED]
Sent: Wednesday, July 09, 2008 2:48 AM
To: NBAFProgramManager

1|25.2

Hello, my name is Andrea Isshak. I am a student at the University of Georgia and am a fellow resident of [REDACTED], Ga. I'm sure you have gotten plenty of opinions on why the bio terror lab being built in Athens, Ga is a bad idea. In my opinion, I don't think it's safe to be built ANYWHERE on the mainland. I am not against what you test, how the tests are being conducted, or your methods. My main concern is WHERE you build this facility. Building it anywhere near people, plant life, animals, ect. will only result in disaster. I don't think it's a good idea to risk it; our country has suffered enough damage and destruction, don't let this one be another mistake. Georgia already has the CDC. We don't need another facility like it, especially one so damaging to our environment.

2|5.0:

My father, 2 uncles, and my late aunt are ALL doctors. I understand how serious it is to find cures to disease; I also understand the methods used to test and research them. But building this facility on the U.S mainland is a ridiculous idea! Heaven forbid this facility gets attacked! Then what?! All these incurable diseases will run rampant across the U.S killing millions. I feel like this is giving who we're fighting against a freebie. It was VERY easy for them to infiltrate our country, just imagine what they would do if they attacked the bio terror lab.

3|21.0

I've made all the points that I've needed to make. Please, when you do make this decision, think about the welfare of the U.S citizens first. I have lost faith in this administration, and I feel that if this bio terror lab gets built in Athens, Ga or anywhere else in the U.S, I will have lost faith in our government and the ideals that we "claim" to live by, forever.

Sincerley,

Andrea Isshak

It's a talkathon -- but it's not just talk.
http://www.intalkathon.com/?source=EML_WLH_Talkathon_JustTalk

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

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

Comment No: 3 Issue Code: 21.0

DHS notes the commentor's concerns regarding the risk of a potential accident or terrorist event. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. 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 an accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. Section 3.14 and Appendix E of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The TRA is "For Official Use Only" and is not available for public review. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies.

Iupe, William

Page 1 of 2

Aug-21-08 03:53pm From: CARR (RIGGS (INGRAM

T-74 P. 01/02 F-246

CARR, RIGGS & INGRAM LLC
282 Commerce Park Drive
P O Box 2418, Ridgeland, MS 39158-2418
Phone: 601.853.7050
Tollfree: 1.800.487.8551
FAX: 601.853.9331
www.cricpa.com

FD0038



To: U.S. Department of Homeland Security
From: Bill Iupe

Fax: 1-866-608-6223
Pages: 2 page including cover page

Phone:
Date: August 21, 2008

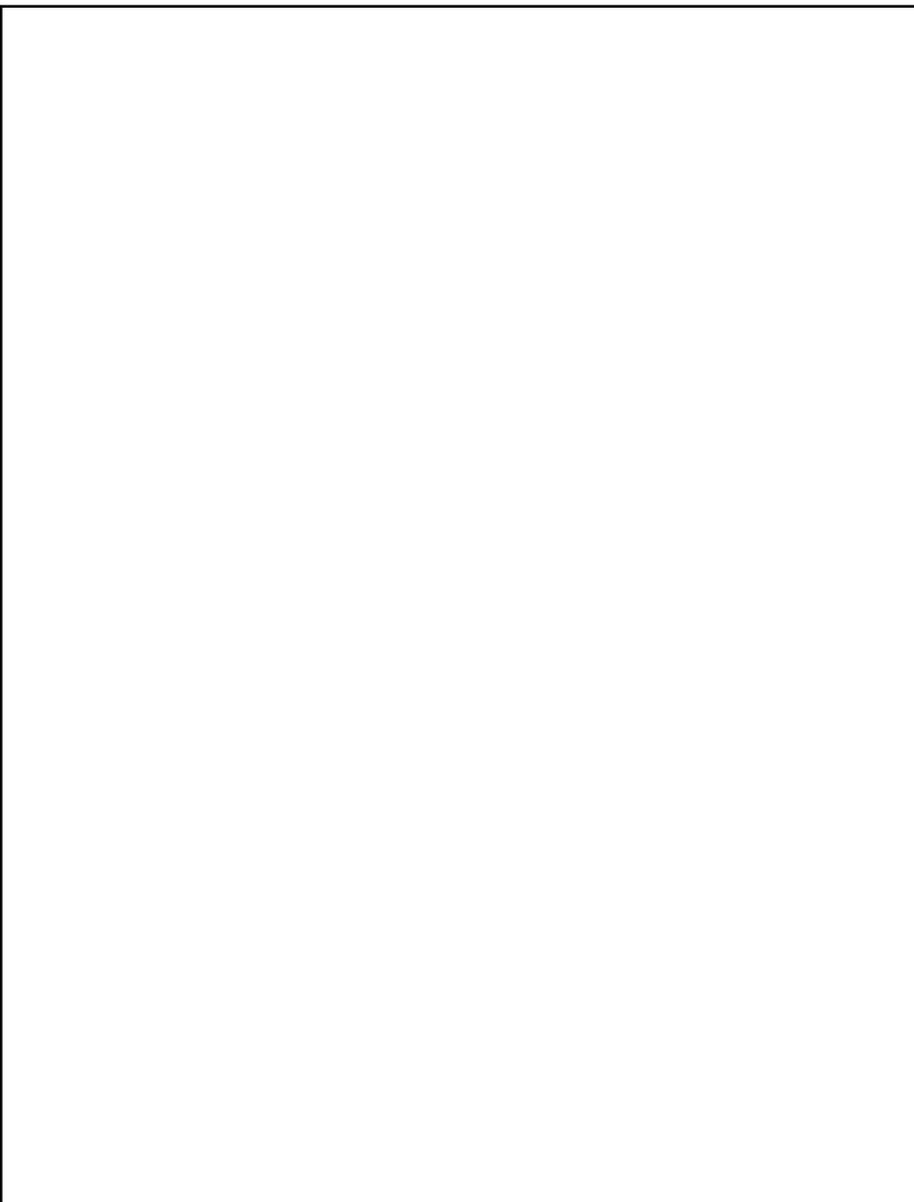
Re: Support for National Bio and Agro-Defense Facility ("NBAF") to Mississippi

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• Comments:

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Iupe, William

Page 2 of 2

Aug-21-08 03:53pm From-CARR (RIGGS INGRAM)

T-174 P.02/02 F-246



By facsimile

CARR, RIGGS & INGRAM, LLC
282 Commerce Park Drive
P.O. Box 2418
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www.cricpa.com

August 21, 2008

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

Re: Support for National Bio and Agro-Defense Facility ("NBAF") to Mississippi

To Whom It May Concern:

I am a resident of [redacted] Mississippi - the same county that the proposed NBAF will be located. I am confident that all steps will be taken to make sure the facility will be safe and secure. It is with that confidence that I support the location of the facility to the Flora, Mississippi site.

Although I was born, raised, and educated in Mississippi, I spent the first ten years of my professional career in Atlanta, the home of the Center for Disease Control ("CDC"). Never once did I fear the impact of the CDC and that is one reason I am confident in my support for the NBAF.

My three children attend the Madison County Public Schools and I am a graduate of Mississippi State University where we take great pride in our veterinarian school. We believe that the collaboration between our educational institutions, our private sector, and our public sector to not only attract, but to support this venture is second to none. We believe the selection of the Flora, Mississippi location will assist in keeping our bright young people in our state.

Our state has raised and educated many talented people that have left the state for perceived better professional opportunities. I would like to believe that my teenage daughter who aspires to be a veterinarian with a degree from Mississippi State University will have the opportunity to one day work in this facility.

We appreciate your consideration of Flora, Mississippi as the host of the NBAF facility.

Thanks for listening,

[Signature]
William W. Iupe

American Institute of Certified Public Accountants
Alabama Society of Certified Public Accountants
Florida Institute of Certified Public Accountants
Georgia Society of Certified Public Accountants
Mississippi Society of Certified Public Accountants
Tennessee Society of Certified Public Accountants
AICPA Alliance for CPA Firms
Center for AICPA Quality

1 | 24.5

Comment No: 1

Issue Code: 24.5

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

Ivancic, Joanne

Page 1 of 1

WD0081

From: [REDACTED]
Sent: Wednesday, July 16, 2008 9:46 AM
To: NBAFProgramManager
Subject: Comments on NBAF DEIS

1| 24.1 | Facilities working with deadly pathogens for which there are no cures, no treatment and/or no prevention methods should be protected by the most strict security we can devise. At this time, the location on Plum Island appears to be superior to any non-island location. In addition, this location and the security and safety procedures in place--and ones developed with new technologies, protects the public in the area in addition to the facilities.

There can never be an entirely safe place--not even in the deep bowels of a mountain, I suppose. Any location to which the activities now performed in this facility (or research on newly developed pathogens) must be more secure, more safe, farther away from inhabited areas, not detrimental to existing life (human or otherwise) or resources (such as watersheds, etc.)

2| 5.0 | The activities undertaken at Plum Island and such facilities are too dangerous to be located
3| 21.0 | anywhere near populated areas. I fear as it is for the security of the water and the people living
4| 19.0 | near this location as it is. It should not be moved unless, the government can prove significant increases in safety, security, protection of local populations and environment.

Joanne M. Ivancic
[REDACTED]

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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 support for the Plum Island Site Alternative.

Comment No: 3 Issue Code: 21.0

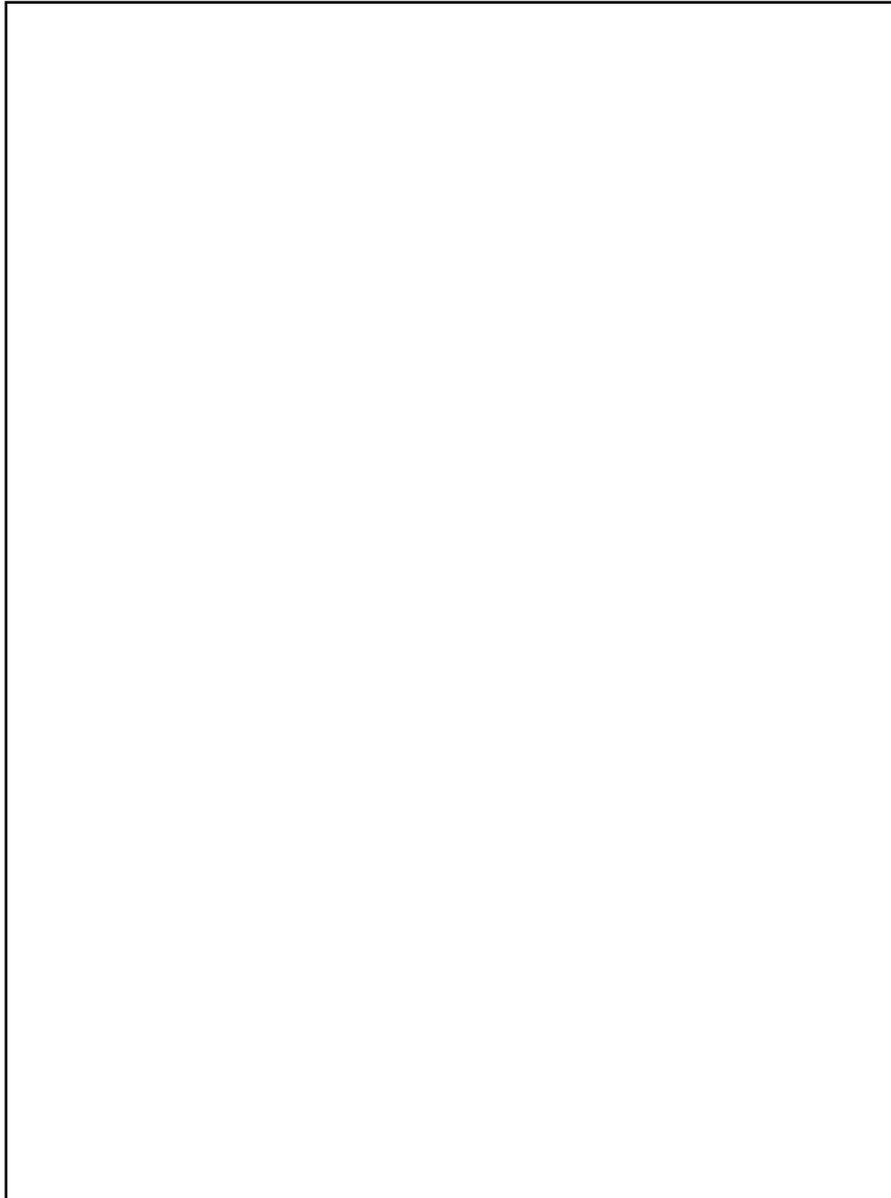
DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. 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.

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, including releases due to weather events. 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 NBAF EIS describes biocontainment lapses and laboratory-acquired infections in the United States and worldwide. 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 Animal and Plant Health Inspection Service 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, including institutionalized 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: 4 Issue Code: 19.0

DHS notes the commentor's position and concern for locating NBAF on a mainland site. 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 on the mainland.

Jackson, Barbara

Page 1 of 1

PD0022

July 24, 2008

1| 25.1 | My name is Barbara Jackson. I am a [REDACTED] resident, and I am absolutely against Plum Island getting any bigger than it is. I don't even want it there at all. But for you people to put us in the position of not having any choice to get off this island if anything happens, is absolutely a disregard for human life, and I don't understand you people at all.

Comment No: 1

Issue Code: 25.1

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

Jackson, Robert

Page 1 of 1

CD0907

From: [REDACTED] on behalf of Robert Jackson [REDACTED]
Sent: Monday, August 25, 2008 5:02 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1) 25.2 | I am strongly opposed to having NBAF in our community of Athens, GA.
 2) 15.2 | The proposed Athens, GA site is neither safe nor compatible from an environmental standpoint for the construction
 3) 21.2 | of NBAF. The proposed site is also located too close to a large student population of over 35,000 students. In case of
 an accident or terrorist attack the proximity of such a facility is much too close to this large populated area.

4) 13.2 | The proposed site is also immediately adjacent to the State Botanical Garden, the Oconee River and the designated
 5) 16.2 | Important Bird Area in Athens, GA. Hikers use the trails that would border this site and the river is used for fishing,
 6) 23.0 | rafting and canoeing. This is very troublesome since the DEIS discloses an "insectary" where disease-spreading
 mosquitoes and other "vectors" will be bred.

7) 12.2 | Athens, Georgia is also in the midst of the worst drought in over 100 years. Severe water restrictions were imposed
 last year hurting many businesses and affecting every homeowner in Athens-Clarke County. Economic measures
 have been put into legislation to charge homeowners and businesses a higher water rate if they exceed their previous
 low "winter" water use amount. This drought may be just the beginning of a 20 year cycle or permanent condition
 due to global warming and the extra strain that the NBAF facility would bring to our water supply is irresponsible to
 the residents of the community.

1 cont.) 25.2 | I am strongly opposed to NBAF and will continue to actively work against any effort to bring NBAF to our
 community.

Sincerely,

Robert Jackson
 [REDACTED]

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: 15.2

DHS notes the commentor's concern. As described in Section 2.3.1 of the NBAF EIS, DHS's site selection criteria included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. Nevertheless, it has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the Draft EIS and the risks were determined to be low for all site alternatives.

Comment No: 3 Issue Code: 21.2

DHS notes the commentor's concerns regarding the risk of a potential accident or terrorist event. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. 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 an accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. Section 3.14 and Appendix E of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The TRA is "For Official Use Only" and is not available for public review. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies.

Comment No: 4 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden, Important Bird Area (IBA), and Middle Oconee River. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden or IBA. Terrestrial, aquatic, and rare and endangered species that occur in the vicinity of the proposed NBAF are addressed in Sections 3.8.3.1.3, 3.8.3.1.4, and 3.8.3.1.5 of the NBAF EIS. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden with 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 forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and Whitehall Forest. Mitigation measures would include low impact development (LID) techniques, BMPs, and requirements for a stormwater pollution prevention plan; which would minimize the potential for adverse impacts associated with erosion and stormwater runoff. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 5 Issue Code: 16.2

DHS notes the commentor's concern regarding effects to recreation. The effects on recreational amenities in the vicinity of the South Milledge Avenue Site Alternative are described in Section 3.10.3 and would not be significantly affected by construction or operation of the proposed NBAF.

Comment No: 6 Issue Code: 23.0

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. 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, vector

escape 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. 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: 7 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges regional drought conditions. The NBAF EIS Chapter 3 Section 3.7.3.3.1 describes the NBAF's potential potable water use at the South Milledge Avenue Site alternative as approximately 118,000 gallons per day approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF's annual potable water usage is comparable to 228 residential homes' annual potable water usage. The NBAF EIS Chapter 3 Section 3.10.3 describes the potential socioeconomic affects from the South Milledge Avenue Site alternative.

James, William R (Randy)

Page 1 of 1

Aug 20 08 04:36p [redacted] p.1
FD0031

| | |
|--|--|
| F A X William R. James [redacted]  | To: DHS Fax number: (866)508-6223 |
| | From: William R. James Fax number: [redacted] |
| | Date: 8/15/2008 |
| | Regarding: NABF, Flora, Mississippi |
| | Phone number for follow-up: [redacted] |

Comments:

1| 24.5 **As a business leader, a resident of Mississippi and past president of the Greater Jackson Chamber Partnership, I have researched the NABF effort to locate in Flora, Mississippi. It is my opinion that this facility would pose no threat to the environment or the people in the area. I also believe that protecting our nation's security against bioterrorism has now become a major issue in order maintain the security that the people of our great country are accustomed to.**

If the facility is located in our state, it would provide much needed help by bringing new jobs to the area and helping to boost a sluggish economy throughout the area.

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

Jarrard, Deborah

Page 1 of 1

WD0665

From: [REDACTED] on behalf of Deborah Jarrard [REDACTED]

Sent: Friday, August 22, 2008 5:41 PM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

To Whom It May Concern:

This letter is to notify you that I am vehemently in opposition to locating the NBAF in Athens, Georgia.

1|25.2

Although I was unable to make the last hearing, I want my opposition on the record. Due to a recent newspaper article, I had the impression that Athens was no longer in the running - and therefore did not attend. This opinion also holds true for several of my friends who are in opposition and asked me to pass this along to you.

2|21.1;

3|12.2;

2Cont|21.1

1Cont|25.2

Other than obvious safety considerations, the humidity, water situation, amount of farms and agribusinesses, and population density in Clark and surrounding counties truly makes Athens a ridiculous choice!

I vote NO and wish my vote to be counted!

D. Jarrard

Comment No: 1

Issue Code: 25.2

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

Comment No: 2

Issue Code: 21.2

DHS notes the commentor's concern 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 on the U.S. mainland. 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.

Comment No: 3

Issue Code: 12.2

DHS notes the commentor's opinion. Several factors will affect the decision on whether or not the NBAF is built, and, if so, where. The EIS itself will not be the sole deciding factor. The decision will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable Federal, state, and local laws and regulatory requirements; 4) consultation requirements among the Federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Jenkins, Don

Page 1 of 1

08/01/2008 12:39 [REDACTED] PAGE 01
FD0005

[REDACTED]

Fax

To: James V. Johnson **From:** Don Jenkins, Human Resources Leader
Fax: 866/508-6223 **Pages:** 1 (including cover sheet)
Re: **Date:** 8/1/2008

Urgent For Review Please Comment Please Reply Please Recycle

Mr. Johnson,

1| 24.3 | I am from Granville County and I support the Bio Disease Lab being in this county. We are very much an agricultural area and we are sensitive to the needs to prevent diseases in animals.

2| 8.3 | I would ask you to ignore the silly protests and build the Lab in the Butner, North Carolina location. The proximity to the major universities makes this location a prime place as the Universities stand ready to help and support in any way.

I am an environmentalist and hold a lifetime fishing license, but believe in the ability to contain any diseases within the facility.

Thank you for your consideration, and feel free to contact me if I may be of assistance.

Yours truly,

Comment No: 1 Issue Code: 24.3
DHS notes the commentor's support for the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 8.3
DHS notes the commentor's support for the Umstead Research Farm Site Alternative.

Jenkins, Linda

Page 1 of 1

WD0580

From: Linda Jenkins [REDACTED]
Sent: Sunday, August 24, 2008 1:45 PM
To: NBAFProgramManager
Subject: Point to consider - against NBAF in Athens, GA

1|2.0 | The reason you're looking for a location to build the NBAF facility is
because the one in Plum Island is obsolete. What steps are being taken
to prevent the new one from being obsolete in 50 years? The same steps
that were taken 50 years ago - to prevent the obsolescence of the Plum
Island facility? I thought so. Why should my grandchildren have to deal
2|5.1 | with a defunct facility 50 years from now. Keep it on Plum Island.

Linda Jenkins

[REDACTED] GA [REDACTED]

Comment No: 1 Issue Code: 2.0

DHS notes the commentor's concerns regarding the design life of the NBAF. The design life of the NBAF is 50 years. The U.S. Congress and the President are responsible for determining funding priorities for government programs. DHS spends funds in accordance with congressional intent. DHS would maintain the NBAF and ancillary facilities in compliance with applicable environmental, safety, and health requirements and provide for safe operation and maintenance for the 50 year design life of the facility.

Comment No: 2 Issue Code: 5.1

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

Jenkins, Thomas M. and Linda E.

Page 1 of 2

WD0595

From: Thom Jenkins [REDACTED]
Sent: Sunday, August 24, 2008 9:52 AM
To: NBAFProgramManager
Cc: [REDACTED]
Subject: Points to Consider for NBAF Anywhere

NBAF Program Manager:

- 1) The suite of pathogens at Plumb Island is stated to be 41 genotypes. Research involves genetic manipulation, resulting in multiple variations - with significant increases in risks should there be an accidental or purposeful release of these pathogens. This argues for a maximally sequestered location, such as Plumb Island.
- 2) NBAF is designed to be a viable facility for the next 50 years. Athens has been in a 10year+ period of declining rainfall, and those who watch the weather radar can tell you that when a storm comes in from the Gulf of Mexico, which is the primary pattern for delivery of rain, the metroplex of Atlanta either splits the storm or sends it to the north of Athens. It takes a powerful storm to overcome this heat silo effect, and therefore, we can expect continuing declines in rainfall in Athens. Do the professional climatologists at NOAA have a forecast for the Athens area that is different from our experience and if so, how do they justify it? Do they have an explanation for the continuing 10 year+ decline of rainfall in Athens (we are now - August 24 - a foot short of the declining average). Given the water intensity of this facility, the continuing decline in water supplies across the state of GA - in part due to abundant large military and other Federal installations - what is your contingency plan for reducing water consumption at NBAF? Or - are you relying on hope for better rainfall? Or - are you relying on the 800 lb gorilla strategy to claim more than a fair share of water for NBAF. Regardless of the answers - the fragility of the water situation in GA argues against locating NBAF here. If there must be an NBAF, the water requirements argue for a Plumb Island location.
- 3) Another looming shortage is energy - from both oil and natural gas. Oil production worldwide has plateaued since 2005. Natural gas production will plummet when existing North American supplies are exhausted, as seems likely. The coal that is left, just like the oil that is left, is more difficult to extract, of lower quality and of lower net energy returned for energy invested. All this adds up to trouble for a facility like NBAF over the next 50 years. It adds up to trouble for those who unfortunately live in the vicinity of NBAF. What are your contingency plans for an ongoing energy emergency? Is the next step to build a nuclear power plant for NBAF?
- All these issues argue for keeping NBAF - if we must have one - at Plumb Island. While the DEIS asserts that construction at Plumb Island is the highest cost alternative, the contingent economics of NBAF argue that it should indeed be sited at Plumb Island, since at that location all the contingencies are more readily managed - from all cost perspectives (legal, environmental, health effects, risk management, energy, etc).**

Comment No: 1 Issue Code: 24.1

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative in favor of the Plum Island Site Alternative based on risks to residents. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated in populated areas such as Athens. An example is the Centers for Disease Control and Prevention located in downtown Atlanta.

Comment No: 2 Issue Code: 12.2

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

Comment No: 3 Issue Code: 8.0

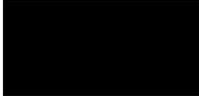
DHS notes the commentor's concern regarding the sustainability of oil and natural gas as fuel sources for electrical power generation. A discussion of the electrical power infrastructure, to include a brief description of the type of generating plants operated by each area's utility company, is provided in Section 3.3.2 through Section 3.3.8 of the NBAF EIS. For the NBAF operation at the South Milledge Avenue Site, the electrical utility operates a network of 14 generating plants fueled by coal, nuclear and oil in addition to 20 hydroelectric dams.

Jenkins, Thomas M. and Linda E.

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WD0595

Sincerely,
Thomas M. and Linda E. Jenkins



Johns, Heather

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NCD017

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: Heather Johns

Title: _____

Organization: _____

Address: _____

City: _____ State: NC Zip Code: _____

Comments:

While the responses to questions were educated from an intellectual standpoint, you demonstrate a basic lack of understanding of rural life and what happens in our area on a day to day basis. The assumption that the deer population can be contained in any city is preposterous.

The numbers presented in the case of release don't tell the real story of impact on this area. Most of the small farmers in the area would lose everything if they lost their livestock. We own horses for fun and as an investment. If we lost them because of disease the amount would only be in the tens of thousands (a small amount in the big picture), but enough to bring significant difficulty financially to our family. Most people here can't afford insurance on their livestock.

(Continued on back for your convenience)

Comment No: 1 Issue Code: 21.3

DHS notes the commentor's concern regarding the impact to the wild deer population from a pathogen release. A discussion of the potential effects to deer populations from pathogens is included in Section 3.8.9 of the NBAF EIS. A worst-case scenario in which deer become infected with the FMD virus, disease-induced mortality and depopulation control measures could result in loss or reduction of local deer populations. However, from a historical basis, the effects of FMD on wild deer populations throughout the world are limited in that the virus burns it self out. In either case, white-tailed deer are capable of rapid population growth and would recover in time. The effects to the local community would be primarily economic in nature, from loss of livestock product export and recreational hunting (see Section 3.10.9).

DHS notes commentor's concern. The potential economic effects resulting from an accidental release of FMD is discussed in Appendix D and Section 3.10.9 of the NBAF DEIS. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as \$4.2 billion until the U.S. was declared foreign animal disease free. In comparison to \$4.2 billion from the Kansas FMD modeling scenario, the estimated total economic costs for the South Milledge Avenue Site is the second lowest out of all site alternatives, with the Plum Island Site Alternative being the lowest, and is estimated at \$3.35 billion. Approximately \$154 million is attributed to industry disruption losses and \$94 million is attributed to government costs incurred during containment activities. The cattle and pork industries in Georgia and in the counties adjacent to the proposed South Milledge Avenue Site in particular are relatively small. In 2008, animal production activity in the six-county region generated \$559 million in industry output. The majority was from poultry and egg production (\$512 million), which is not expected to be at risk from the accidental release of pathogens from the facility.

Johns, Heather

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NCD017

1 cont.
21.3

loss would be significant for every individual though the numbers would be insignificant in the big picture.

212.0

An even greater concern is the funding for the project 10, twenty or fifty years from now. You assume great and marvelous things now, but what will our children be left with when funding this project is no longer a priority. Pinn Island is a case in point. If it had been adequately funded and overseen we wouldn't be having this conversation.

THANK YOU FOR YOUR COMMENTS

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

U.S. MAIL

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

TOLL-FREE FAX

1-866-508-NBAF (6223)

Comment No: 2

Issue Code: 2.0

DHS notes the commentor's statement. The U.S. Congress and the President are responsible for determining funding priorities for government programs. DHS spends funds in accordance with congressional intent. DHS would maintain the NBAF and ancillary facilities in compliance with applicable environmental, safety, and health requirements and provide for safe operation and maintenance.

Johns, PhD, Douglas

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WD0237

From: [REDACTED]
Sent: Monday, August 11, 2008 8:36 PM
To: NBAFProgramManager
Subject: Expressing opposition to NBAF in Butner NC

1|25.3 | My name is Douglas Johns and I am writing to express my opposition to locating a National Bio and Agro-Defense
 2|21.0 | Facility in Butner NC. I hold a PhD from the University of Washington School of Public Health and have a
 1 cont. | background in Toxicology and Human Health Risk Assessment. While I am indeed very concerned over the
 25.3 | potential health risks associated with this facility, I am even more concerned that the will of the people is not being
 | respected or addressed. I have lived in this area for only a short time, but it is very clear to me that the vast majority
 | of Granville County residents are opposed to this facility. They want nothing to do with you, and because of their
 | passion and loud voices, I don't think you want anything to do with them either.

Thank you for your time and consideration.

Douglas Johns, PhD
 [REDACTED]

Comment No: 1 Issue Code: 25.3

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

Comment No: 2 Issue Code: 21.0

DHS notes the commentor's concern for the effects to human health and safety. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 and Appendix E of the NBAF EIS. The risks were determined to be extremely low for all site alternatives. 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. NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. 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.

Johnson, Chuck

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WD0585

1| 24.4 |

From: Chuck Johnson [REDACTED]
Sent: Sunday, August 24, 2008 12:33 PM
To: NBAFProgramManager
Subject: I support NBAF in Kansas

It's good for the country.
It's good for Kansas.

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