

**Kratzer, David****Page 1 of 1**

WD0358

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**From:** David Kratzer [REDACTED]  
**Sent:** Tuesday, August 19, 2008 1:56 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Kansas

- 1|25.4 | I am writing to express opposition to the establishment of a National Agro and Bio-defense Facility in Kansas.
- 2|21.4 | I'm sure you have heard all the reasons for opposing this action, but to me the concern for the safety of my children and grandchildren would rank at the top of the list.
- It would only be a matter of time before an accident, whether human error, terroristic act, or natural catastrophe will occur, and it simply is not worth the risk to have such a facility in the heartland of America.
- 3|5.1 | Research is important, but where it is conducted is also important. Keeping the facility at Plum Island is the best choice.

David Kratzer  
[REDACTED] Kansas

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 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. Risks and impacts 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.

Comment No: 3                      Issue Code: 5.1

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

## Krause, Duncan

## Page 1 of 1

WD0449

**From:** Duncan Krause [REDACTED]  
**Sent:** Friday, August 22, 2008 3:56 PM  
**To:** NBAFProgramManager  
**Subject:** Comments concerning the South Milledge Avenue site, Athens, GA

1 | 24.2 | I am an Athens / Clarke County resident and have been a member of the faculty in the Department of Microbiology at the University of Georgia for 23 years, most recently as Professor and Director of the Faculty of Infectious Diseases. My purpose in writing is to convey my strong support for the NBAF initiative, and in particular the proposed South Milledge Avenue site. It is in that context that I wish to convey the following thoughts.

2 | 1.0 | As we begin to come to grips with the impact of human activity on the health of our planet, an area that remains largely underappreciated is the impact of population growth and industrialization on the emergence and re-emergence of infectious diseases. Broadly speaking, more than thirty infectious diseases have emerged or re-emerged over the last three decades. Most have a zoonotic origin, and many, such as HIV, West Nile Virus, and SARS-Cv have spread globally. Significantly, there is no indication that this pattern of emergence / re-emergence of infectious diseases will change in the foreseeable future. Coincidentally, and by analogy, for over three decades the U.S. has been in denial over the limits (not to mention the consequences) of fossil fuel consumption, until that reality hit home at the fuel pump. Are we destined to make the same mistake in confronting emerging infectious diseases? And if so, by what catastrophic scenario will we finally be brought to our senses?

3 | 15.2 | The NBAF mission will encompass the threat that infectious diseases pose to human, animal, and ecosystem health, but in order to be truly effective this will require that NBAF be situated geographically in an area that can provide the strongest possible scientific critical mass in biomedical and complementary fields to support and collaborate with NBAF staff scientists. The Athens area is uniquely qualified in this respect with a cadre of scientists having the expertise in diverse complementary fields such as Ecology, Public Health, and Veterinary Medicine, to make a significant difference in helping meet the challenge of emerging infectious disease threats and safeguard public health, our food supply, and indeed global health. It is my impression that the opposition expressed by a few local residents is largely a function of fear arising from a campaign of misunderstanding, and that most Athens / Clarke County residents appreciate the need for NBAF and support its possible location in this community.

4 | 8.2 |

Sincerely yours,

Duncan C. Krause  
 [REDACTED]  
 GA [REDACTED]

Comment No: 1                      Issue Code: 24.2

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

Comment No: 2                      Issue Code: 1.0

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

Comment No: 3                      Issue Code: 15.2

DHS notes the commentor's statement. As described in Section 2.3.1, DHS's site selection criteria included such factors as, but were not limited to, proximity to research capabilities and workforce.

Comment No: 4                      Issue Code: 8.2

DHS notes the commentor's statement.

Kren, Margo

Page 1 of 1

WD0250

**From:** Margo Kren [REDACTED]  
**Sent:** Thursday, August 14, 2008 4:41 PM  
**To:** NBAFProgramManager  
**Subject:** no nsaf in kansas

1|25.4; I am totally horrified with the thought that the Department of Homeland Security plans to build the biggest  
2|21.44; germ lab in the world on the KSU campus to study diseases like Foot and Mouth Disease which there are  
3|5.0 no vaccines or treatments. All things like human error, accidents, natural disasters like our famous  
1 cont.| Kansas tornados are all factors that clearly promote the best idea of an island (NBAF) location.  
25.4 WHY HERE? I don't understand it!

Margo Kren

[REDACTED]  
[REDACTED]  
[REDACTED] Kansas [REDACTED]  
[REDACTED]Comment No: 1      Issue Code: 25.4

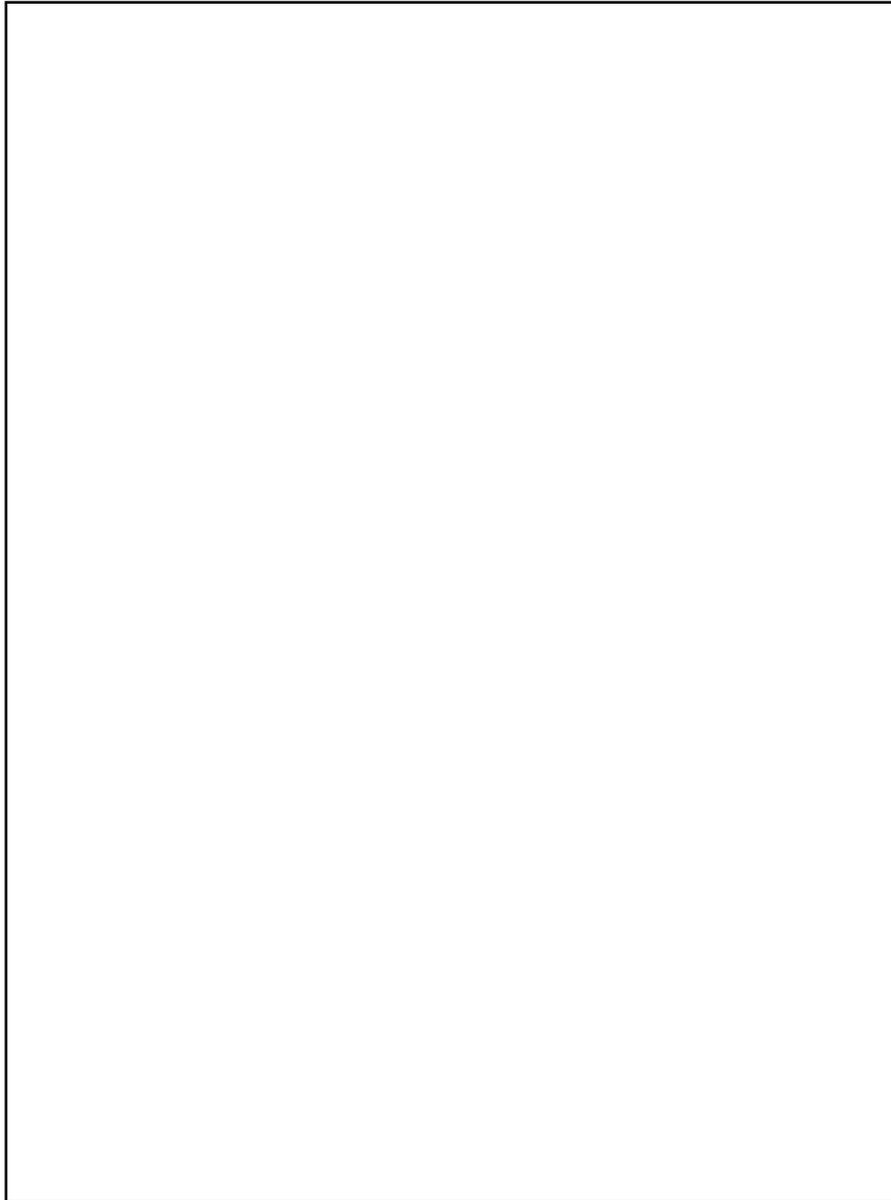
DHS notes the commenter's opposition to the Manhattan Campus Site Alternative.

Comment No: 2      Issue Code: 21.4

DHS notes the commenter's concerns. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are extremely low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release.

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

As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Training and inherent biocontainment safeguards reduce the likelihood of a release.



Comment No: 3                      Issue Code: 5.0  
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative and support for the Plum Island Site Alternative.

**Kuhnert, Gay**

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WD0136

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**From:** [REDACTED]  
**Sent:** Thursday, July 31, 2008 9:37 PM  
**To:** NBAFProgramManager  
**Subject:** No NBAF

Hello:

1|25.2 | I am writing to voice my concern over the consideration of Athens, Ga for the NBAF site.

I strongly oppose locating the NBAF in Athens, GA. I have read a lot of information about this situation and feel that this facility should not be relocated here due to the many security issues.

Sincerely,  
Gay Kuhnert

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

**Kuhnert, Gay**

**Page 1 of 1**

WD0864

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**From:** [REDACTED]  
**Sent:** Monday, August 25, 2008 10:06 PM  
**To:** NBAFProgramManager  
**Subject:** No to NBAF in Athens

1| 25.2

This email is to express my opinion that I do not want the NBAF in Athens, Ga.

Thank you,  
Gay Kuhnert

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

Lackford, Brad

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NCD011

## 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: Brad Lackford

Title: Biologist

Organization: National Institute of Environmental Health Sciences

Address: 1161 Andrews Court

City: Creedmoor State: NC Zip Code: 27552

Comment 124.3 | I am actually for building the lab here. I currently  
2121.0  
work for the NIH and am well aware of the dangers of these  
pathogens. I am also aware of the ability to work with them  
safely and the great benefit that can come from research on  
them. The Agro-defense part of the lab will be of great  
importance to the local area, as much of it is rural and dependent  
upon agriculture. I think the people of Butler & Creedmoor  
314.0  
just need to be educated about the lab and the "risks" to  
the public. There is a lot of miss information and ignorance  
in the community that needs to be addressed. But I think  
the people will appreciate the contributions the lab will have  
once they understand the nature of the research and risks.  
many of the pathogens to be studied are already in the triangle in  
labs at UNC-CH, NC State, and Duke, as well as NIEHS. Education  
about these pathogens is essential for public acceptance no matter  
where the lab is built.  
(Continued on back for your convenience)

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: 21.0  
 DHS notes the commentor's support for the NBAF and understanding that the proposed research would be safely conducted regardless of NBAF location.

Comment No: 3                      Issue Code: 4.0  
 DHS notes the commentor's support for the NBAF and understanding that the proposed research would be safely conducted regardless of NBAF location.

**Ladd, Nicholas**

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WD0711

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**From:** Nick Ladd [REDACTED]  
**Sent:** Monday, August 25, 2008 12:00 PM  
**To:** NBAFProgramManager  
**Subject:** NC citizen against NBADF

To whom it may concern,

1|25.3; I do not want National Bio- and Agro- Defense Facility (NBADF), in Butner (near Durham) or at  
2|25.0 ANY of the proposed sites. Thank you for hearing my comments and concerns.

--  
Best Wishes,

Nicholas K. Ladd  
[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: 25.0  
DHS notes the commentor's opposition to the NBAF.

LaFleur, Alice Tipton

Page 1 of 1

WD0078

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**From:** Alice Tipton [REDACTED]  
**Sent:** Tuesday, July 15, 2008 11:31 AM  
**To:** NBAFProgramManager  
**Subject:** No to NBAF locating in Athens Georgia

1) 25.2 | I have been against this from the start, and nothing I have heard or read makes me feel any different.  
2) 5.0 | To the contrary, the more I read and hear, the more opposed I become. Take this bio-lab elsewhere,  
Athens Georgia is not the place for it. Alice Tipton LaFleur, [REDACTED] Georgia.  
Thank you

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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 South Milledge Avenue Site Alternative.

**LaFleur, Alice Tipton**

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WD0355

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**From:** Alice Tipton [REDACTED]  
**Sent:** Tuesday, August 19, 2008 12:19 PM  
**To:** NBAFProgramManager  
**Subject:** Negative on NBAF in Athnes Ga

1|25.2; I am opposed to this facility for a wide variety of reasons. Safety, site choice, revulsion. Please take it to  
2|5.1 Plum Island, where it will do the most good and the least harm. Alice Tipton LaFleur

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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: 5.1  
DHS notes the commentor's support for the Plum Island Site Alternative.

LaFleur, Richard

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WD0171

**From:** R. LAFLEUR [REDACTED]  
**Sent:** Monday, August 04, 2008 10:55 AM  
**To:** NBAFProgramManager  
**Subject:** No NBAF in Athens Georgia

By now DHS should be fully aware that there is vigorous and widespread opposition in Athens, GA, to the potentially deadly NBAF facility the government is considering situating here.

1| 21.2 | The Athens community lacks confidence in both the motives of DHS and in its ability to prevent or respond to a disastrous breach of the facility, whether caused by accident or by malicious acts of terrorists or even, as in the case of the 2001 anthrax attacks, disgruntled U.S. scientists. The Athens community is fully aware that BSL-4 labs represent the highest level bio-security risk and involve research on some of the planet's deadliest pathogens, including agents that pose a danger of air-transmitted infection with incurable diseases fatal to humans; among the diseases identified by DHS for possible NBAF research are Foot and Mouth Disease, Classical Swine Fever, Japanese Encephalitis virus, and many others, and we are profoundly concerned over the fact that, as DHS reports, this list "may change based upon continued threat assessments."

2| 23.0 |

As you know, Congressman John D. Dingell, chairman of the U.S. House Committee on Energy and Commerce, in his report for the investigative hearing "Germs, Viruses, and Secrets: The Silent Proliferation of Bio-Research Laboratories in the United States," remarked that "The DHS proposal to . . . move foot-and-mouth virus to the mainland U.S. is utterly baffling. Foot-and-mouth is one of the most contagious diseases in the world. We know from recent incidents in the U.K. that it can escape from even a high-level biosafety lab. And we know that any release of the foot-and-mouth virus could have a devastating effect on the U.S. livestock industry, just as it did in the U.K. in 2001." As you know quite well, countless accidents have been uncovered at similar facilities, including the University of Texas and Texas A&M, where workers were infected with anthrax, brucella, and Q-fever. U.S. Representative Bart Stupak, chairman of the Sub-Committee on Oversight and Investigations, asked recently, "Is there a point at which there are so many labs doing this research that you actually increase the chances of a catastrophic release of a deadly disease?" The answer to that question is "ABSOLUTELY YES!"

1 cont.| 21.2 |

When DHS initially announced it was considering re-engineering Plum Island to BSL-4 status, U.S. Senator Hillary Clinton and Congressman Tim Bishop responded: "We continue to stand firmly opposed to placing a Bio-Safety Level 4 facility on Plum Island due to its close proximity to major metropolitan areas." If Clinton and Bishop do not want a BSL-4 within 95 miles of Manhattan, which your own Environmental Impact Study has asserted in far and away the safest of all the sites under consideration, why should Georgians want one within 5 miles of downtown Athens, situated near the Oconee River and adjacent to our pristine State Botanical Garden? The answer is, WE ABSOLUTELY DO NOT!

3| 12.2 |  
4| 13.2 |

The University of Georgia's reasons for initially courting NBAF are clear enough: all of us--humanists and scientists alike--are dedicated to the advance of knowledge and the pursuit of research aimed at improving the human condition. Though others might interpret UGA's motives less generously, I'll concede this may have been a reasonable objective for UGA's initiative. But if UGA were to host such a potentially deadly, highly vulnerable facility, it should be situated on one of the University's most remote properties, distant from metropolitan areas; researchers might find this less convenient, but consciences would be clearer and our students and citizenry safer. An immensely better solution, however, would be to upgrade Plum Island to house this facility--unquestionably the safest solution, as concluded by your own Environmental Impact Study.

5| 5.0 |

Comment No: 1                      Issue Code: 21.2

DHS notes the commentor's lack of confidence in the DHS and concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen. The 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 low for all site alternatives. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, then site-specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area.

Comment No: 2                      Issue Code: 23.0

DHS notes the commentor's concern that all possible pathogens that may be studied at the NBAF are not listed in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Section 2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluate of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required.

Comment No: 3                      Issue Code: 12.2

DHS notes the commentor's concerns regarding the Oconee River. As described in Sections 3.7.3.2 and 3.7.3.3, if the South Milledge Campus Site is selected the NBAF would be held to all local, state, and federal buffer, erosion control, stormwater, and spill prevention planning and permitting requirements.

Comment No: 4                      Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the Botanical Garden. 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. 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 South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be

preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9 of the NBAF EIS. Although the NBAF EIS acknowledges the potential for significant wildlife impacts in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 5                      Issue Code: 5.0

DHS notes the commentor's preference. The proposed NBAF requires BSL-4 capability to meet mission requirements (DHS and USDA). PIADC does not have BSL-4 laboratory or animal space, and the existing PIADC facilities are inadequate to support a BSL-4 laboratory. Upgrading the existing facilities to allow PIADC to meet the current mission would be more costly than building the NBAF on Plum Island, as discussed in Section 2.4.1 of the NBAF EIS.

Comment No: 6                      Issue Code: 15.2

DHS notes the commentor's concern. The economic effects of the NBAF at the South Milledge Avenue Site are included in Section 3.10.3 of the Draft NBAF EIS. Labor income during construction is projected at approximately \$150 million while operation of the NBAF would generate approximately \$28 million in wages annually. The risk of a pathogen release from the proposed NBAF at each of the proposed sites was evaluated in Section 3.14 of the Draft EIS and was determined to be low for all sites.

Comment No: 7                      Issue Code: 12.2

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

Comment No: 8                      Issue Code: 19.3

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 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 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. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. DHS 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.

A site-specific emergency response plan would be developed and coordinated with the local emergency management plan regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF. The type of, duration, and geographical extent of quarantine would be determined by the authorities depending on the pathogen released and contamination level.

Comment No: 9

Issue Code: 25.2

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

LaFleur, Richard

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WD0171

6| 15.2 | ACC officials who initially supported siting NBAF have certainly had second thoughts: DHS and others promoting the facility tout the project's supposed benefits, including estimates of increased employment opportunities and other such incentives, especially tempting with unemployment high and recession looming. But analyses of the financial benefits, originally grossly exaggerated, have been vastly scaled back, and too little attention has been given to associated risks and costs. The huge NBAF installation would occupy and despoil 66 acres of pastoral UGA land, use more than 100,000 gallons of water a day (essential to dealing with the deadly bio-wastes that would be flushed into our sewer system, but a further strain in our extreme 100-year drought), and tax countless other resources, including finances that could be directed to far better, more constructive, and more humane purposes.

7| 12.2 |

Officials in the North Carolina Research Triangle area, who initially welcomed NBAF, wisely changed course and withdrew their support. One consideration was the poignant statement issued by a group of 40 local physicians, which concluded:

8| 19.3 | The Department of Homeland Security will run NBAF and is interested in studying biological weapons viruses there, in part, because even a tiny amount can result in massive devastation. Infections are most likely to occur in people who are nearest the source of the leak, but viruses can travel in the air for up to 40 miles.  
*If you or a family member become infected with any of the BSL-4 diseases that the government may bring to Butner, there will be nothing that any of us can do to cure you, and it is highly likely that you will be quarantined.*

9| 25.2 | Doubtless many Athens physicians would agree. How many of the prospective physicians and physicians-in-training at the proposed new UGA/Medical College of Georgia medical facility would be eager to locate to an Athens that is home to one of the world's largest, deadliest BSL-4 bio-defense facilities? How many parents of future UGA undergraduates, knowing the facts, would be so hopeful of sending their children to our care? How many residents of North Georgia, now increasingly aware of the profound risks NBAF represents, would welcome a decision to locate the facility in Athens? The UGA-headed consortium that drafted the invitation to DHS to consider Athens as a potential site NEVER CONSULTED UGA'S FACULTY; the Mayor of Athens, who drafted a "welcome letter" to DHS at the request of that consortium, NEVER CONSULTED THE CITIZENS OF ATHENS and NEVER CALLED FOR A DISCUSSION AND VOTE BY THE COUNTY COMMISSIONERS, Athens' elected representative body. Thus that initial consortium proposal lacked meaningful input and support from the university and the community. What little support for NBAF did eventually emerge in the Athens and UGA communities has now steadily and dramatically diminished, while the opposition has vastly expanded over the past year: as I hope and expect you have become increasingly aware in recent months, NBAF is NOT WELCOME in Athens, Georgia.

*R.A. LaFleur,* 

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## Laging, William

## Page 1 of 1

WD0416

**From:** William Laging [REDACTED]  
**Sent:** Wednesday, August 20, 2008 2:29 PM  
**To:** NBAFProgramManager  
**Cc:** william.lag >> William Laging  
**Subject:** National Bio and Agro-defense Facility in Manhattan, Kansas

My family has owned and operated a farm located approximately 25 miles from Manhattan, Kansas. My Great Grandfather purchased the farm in 1896, I own it today. It is primarily a cow / calf operation.

I read with interest the news report about locating the National Bio and Agro-defense Facility in Manhattan, Kansas. Although Kansas State University has great people working and studying on the campus, and although I believe they will take the greatest precautions to protect the local environment, I know that mistakes happen and accidents happen.

1|21.4 | If an accident happens and foot and mouth disease escapes into the environment, my farm along with all the farms in the [REDACTED] would be immediately subjected to an out break of disastrous proportions. We would have little choice but to destroy millions of animals.

I know that Kansas needs jobs. All states do, but this research facility brings a lot of risk along with the jobs.

2|5.1 | If I were allowed to vote on the location of this facility, I would vote to keep it on Plum Island, N.Y. where a research lab currently exists. If an accident happened on Plum Island, there would be a good opportunity to contain it on the island and it would certainly not be in the heart of cattle country.

3|25.4 | Thank you for allowing me to express my opposition to the location of this facility in Manhattan.

William Laging

Comment No: 1                      Issue Code: 21.4

DHS notes the commentor's concern regarding the impact from a release of Foot and Mouth Disease (FMD) from the NBAF operation at the Manhattan Campus site. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. 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. While the risk of an accidental release of a pathogen is extremely low, the economic effect would be significant for all sites. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident. However, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Section 3.10.9 and Appendix D of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free. 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.

Comment No: 2                      Issue Code: 5.1

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

Comment No: 3                      Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative.

Lambert, Jimmy

Page 1 of 1

WD0813

**From:** Jimmy T. Lambert [REDACTED]  
**Sent:** Monday, August 25, 2008 5:41 PM  
**To:** nbafterprogrammanager@dhs.gov  
**Subject:** No to NBAF Athens location

- 1| 5.2 | I would like to register my opposition to the proposed NBAF location in Athens, GA.  
 2| 13.2 | I feel that the location of this facility on Milledge Av. would be detrimental to the community in a number of ways.  
 3| 2.0 | First it would be placed on a very sensitive sight next to the State Botanical Gardens and near Whitehall Forest.  
 4| 5.1 | Secondly I feel that it is an example of the current administrations use of fear as a basis for research and as such will not be an efficient vehicle for the proposed research.  
 5| 5.1 | Finally, I would state tat if it is of high importance(to the tune of \$650,000,000 for construction) that it would be worth the added expense of keeping it in a safer location i.e. Plum Island, even though the cost would be higher.

Sincerely,  
 Jimmy Lambert  
 Concerned Citizen [REDACTED] GA

Comment No: 1                      Issue Code: 5.2

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

Comment No: 2                      Issue Code: 13.2

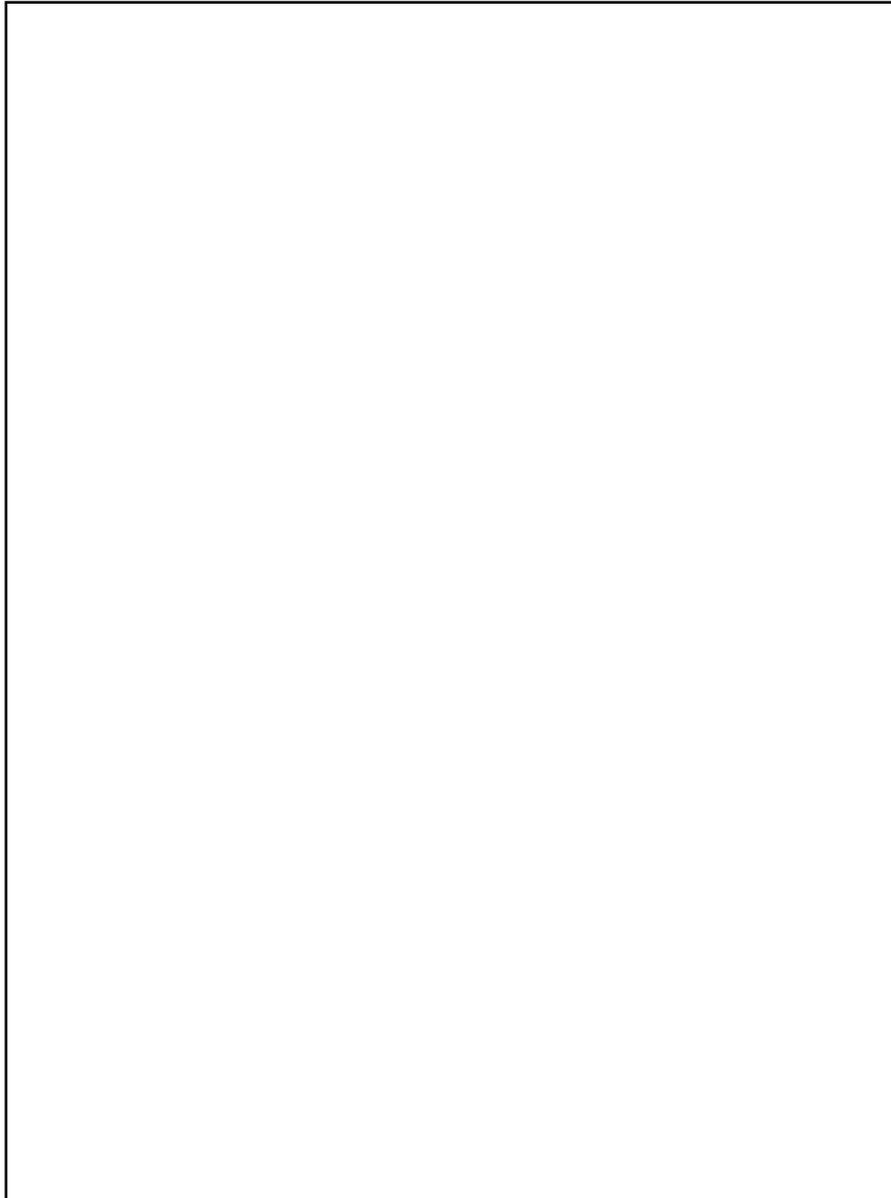
DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the Botanical Garden and Whitehall Forest. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden or Whitehall Forest. 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 South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the Botanical Garden and Whitehall Forest. Mitigation measures would include low impact development (LID) techniques, BMPs, and a stormwater pollution prevention plan; which would minimize the potential for adverse stormwater runoff impacts on aquatic species.

Comment No: 3                      Issue Code: 2.0

DHS notes the commentor's lack of trust in the federal government. Section 3.14 and Appendix E of the NBAF EIS state that the specific objective of the hazard identification is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Appendix B describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operation of the NBAF then site-specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed the NBAF.

Comment No: 4                      Issue Code: 5.1

DHS notes the commentor's support for the Plum Island Site Alternative. Cost is only one of the factors that will be considered by the decision-maker in the ROD. While the potential costs of proposed actions are not a factor in the environmental impact analysis presented in the NBAF EIS,



cost information is summarized in Section 2.5 of the NBAF EIS to provide pertinent information to the DHS Under Secretary for Science and Technology so that he may make a more informed decision with respect to the alternatives presented in the NBAF EIS. DHS made the Site Cost Analysis available to the public on the NBAF Web page (<http://www.dhs.gov/nbaf>).

Lambert, Wanda

Page 1 of 1

WD0849

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**From:** wanda.lambert [REDACTED]  
**Sent:** Monday, August 25, 2008 8:14 PM  
**To:** NBAFProgramManager  
**Subject:** No to NBAF in Athens

1|5.2

I would like to register my opposition to the proposed NBAF location in Athens, GA. I feel that the location of this facility on Milledge Av. would be detrimental to the community in a number of ways. Please do consider this location for placement

Wanda Lambert.

Comment No: 1      Issue Code: 5.2

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

Landis, Tresa

Page 1 of 1

WD0481

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**From:** Tresa Landis [REDACTED]  
**Sent:** Friday, August 22, 2008 12:03 PM  
**To:** NBAFProgramManager  
**Subject:** I support NBAF in Kansas

ello,

1) 24.4 | I want to express my support for the NBAF in Kansas.

2) 8.4 | It is clear that the Manhattan site offers many advantages for the lab including  
--access to excellent K-State faculty researchers  
--the adjacent Bioscience Research Institute (BRI) that could be utilized from day 1 to work on BSL-3 pathogens  
--location in the Animal Health Corridor  
--proximity to livestock and agriculture producers  
--strong state and local support

1 cont.)  
24.4 | I urge you to place the NBAF in Kansas.

*Tresa*

Tresa Landis

Comment No: 1                      Issue Code: 24.4

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

Comment No: 2                      Issue Code: 8.4

DHS notes the information provided by the commentor.

Lariviere, Richard

Page 1 of 1

WD0343

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**From:** Richard Lariviere [REDACTED]  
**Sent:** Tuesday, August 19, 2008 8:27 AM  
**To:** NBAFProgramManager  
**Cc:** Thomas Thornton  
**Subject:** NBAF in Kansas

James Johnson  
DHS Science and Technology Directorate (Mail Stop #2100)  
245 Murray Ln. SW; Bldg. 410  
Washington, DC 20528

Dear Mr. Johnson,

1|24.4 | I wish to add my voice to those who are in favor of locating the proposed National Bio and Agro-Defense Facility in Kansas.

This matter has been the object of intense scrutiny and evaluation in Kansas, and the clear consensus among political, scientific, academic, and popular opinion is that Kansas provides a superb location for NBAF.

Speaking in my professional capacity, I can assure you that the University of Kansas will put whatever resources it can into this project. We feel strongly that a fair evaluation of the economic, scientific, and industrial assets places Kansas in the strongest position to deliver on the requirements of the NBAF. It should, for the benefit of all, be located in Kansas.

Sincerely,

--  
Richard W. Lariviere  
[REDACTED]

Comment No: 1

Issue Code: 24.4

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

Larson, Dean

Page 1 of 1

08/25/2007 07:06 FAX [REDACTED] [REDACTED] 001  
FD0053

8/21/08

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

Dear Sir,

I appreciate the opportunity to make comment concerning the placement of the National Bio and Agro-Defense Facility. I am a 51year resident farmer in Northeast Kansas. I have watched with concern the developments in Manhattan Kansas associated with the wooing of your department to select Kansas as a destination for the level BSL-4 facility. I am sure this occurs at any locale where promise of federal money and relatively high income jobs are promised. I have several questions that I cannot find good answers for. They are as follows:

1) Why consider a separate BSL-4 location in the center of the country when we already have these facilities in 4 locations scattered throughout our country?

2) How do you, and why would you want to, transport these organisms which could be so devastating, right to the heart of our country?

3) Why place any facility in a location which lacks: a)major rail, air, or integral major highways b) places dangerous organisms in an area where there is little defense or community awareness of real or possible terrorism c) not exactly a chosen destination spot for progressive scientists d) a location with few if any natural boundaries which may help in containment or protection.

4) Why not upgrade present facilities in areas where you already have the infrastructure in place? ie.. skilled scientists, trained support personnel, suppliers, housing, security, etc.

In summary I am firmly against this facility being placed in an area that may be only politically correct, not necessarily the best for our country as a whole. Thank you for your attention to my comments.

Sincerely,

Dean Larson  
[REDACTED]  
[REDACTED], Ks. [REDACTED]

Comment No: 1 Issue Code: 1.0

DHS notes the commentor's suggestion. Section 2.4.3 of the NBAF EIS describes other alternatives considered including using existing facilities. However, as was noted in this section, there are no other facilities in the U.S. capable of conducting the research required to meet the DHS and USDA missions.

Chapter 1, Section 1.1 of the NBAF EIS identifies DHS's mission as the study of foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal or benefit of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen.

Comment No: 2 Issue Code: 17.4

DHS notes the commentor's concerns regarding the handling and transport of packages containing pathogens. The general regulations governing the required NBAF handling and transport of packages containing pathogens, and a discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. Section 2.2.2.3 provides detailed information on the handling and transport of packages containing pathogens. Additionally, an analysis of accidental releases during transportation is provided in the NBAF EIS under Section 3.14, Health and Safety. Information regarding the existing road conditions and potential effects to traffic and transportation from the Manhattan Campus Site is provided in Section 3.11.4 of the NBAF EIS. With regard to the shipment of pathogens, no specific transportation corridors have been evaluated. Should a decision be made to build NBAF and a site selected, transportation routes would be identified in accordance with a standard shipment procedure with the route optimized for safety and security.

Comment No: 3 Issue Code: 17.4

DHS notes the commentor's concerns regarding the adequacy of the transportation infrastructure to support the construction and operation of the NBAF at the Manhattan Campus Site Alternative. An evaluation of the existing transportation infrastructure to include road conditions and potential effects to traffic and transportation from the Manhattan Campus Site Alternative is provided in Section 3.11.4 of the NBAF EIS.

Comment No: 4 Issue Code: 21.4

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed,

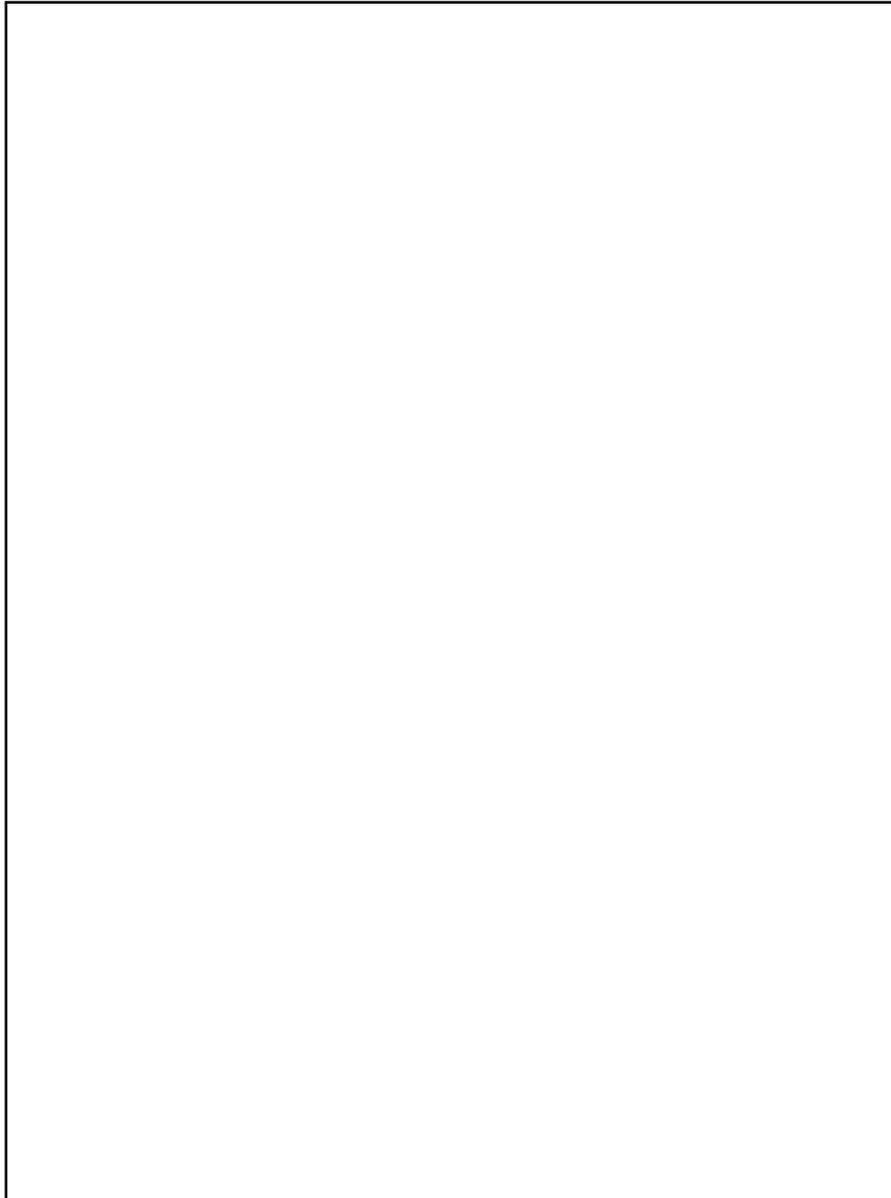
constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, 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. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. DHS 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.

Comment No: 5                      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 Site Alternative has a lower potential impact in case of a release, the probability of a release is low at all sites.

Comment No: 6                      Issue Code: 5.0

DHS notes the commentor's support for the Plum Island Site Alternative. As discussed in Section 2.4.1 of the NBAF EIS the proposed NBAF would require BSL-4 capability. The current facility on Plum Island, PIADC, does not have BSL-4 laboratory space, and the existing infrastructure is inadequate to support a BSL-4 laboratory. Refurbishing the existing facilities and obsolete infrastructure to allow PIADC to meet the new mission would be more costly than building the NBAF



on Plum Island. In addition, for the existing facility to be refurbished, current research activities might have to be suspended for extensive periods.

Comment No: 7

Issue Code: 25.4

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

LaRue, Larry

Page 1 of 1

WD0461

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**From:** [REDACTED]  
**Sent:** Thursday, August 21, 2008 7:57 PM  
**To:** NBAFProgramManager  
**Subject:** Facility support

1| 24.2 | My wife and I are in support of the facility proposed for location in Athens, Georgia.

Mr. and Mrs. Larry LaRue  
[REDACTED] GA [REDACTED]

Comment No: 1      Issue Code: 24.2  
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

Lassen, Don

Page 1 of 1

PD0153

August 21, 2008

1| 25.4

Yes, this is Don Lassen from ██████████ Kansas ██████████. And I want to put my comment against maintaining this center in Manhattan, Kansas. One thing is that we have had leaks in research facilities around the world since 1960 – one at Plum Island where it is now – we had one more chance, that if we moved it at Manhattan where it could travel quickly and spread to states, very quickly, as it's centrally located. I know that's probably one of the reasons you want it there. But I think that we need to think more in the way of not just money but for containment. And that's why I'm against bringing it to Manhattan, Kansas or anywhere like that.

2| 5.0

I appreciate it and thank you.

Comment No: 1

Issue Code: 25.4

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

Comment No: 2

Issue Code: 5.0

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

Laster, Jonathan

Page 1 of 1

WD0532

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**From:** John Laster [REDACTED]  
**Sent:** Sunday, August 24, 2008 10:21 PM  
**To:** NBAFProgramManager  
**Subject:** Support for Athens Location for National Bio- and Agro-Defense Facility

I am writing to express my support for the National Bio- and Agro-Defense Facility to be located in Athens, Georgia.

1 | 24.2

The Athens area is home not only to many of the world's brightest scientific minds in the area of agriculture and biological research, but also to a rich agricultural tradition. This region has historically supported the introduction of new products and techniques often discovered at the University of Georgia, and has benefitted greatly from the practical application of the natural sciences, most recently in the area of poultry farming.

Examples of the harmonious existence of farming and domestic life abound in this area, from the poultry research farms in Athens that face a major shopping center, to the handsome suburban golf-course communities of Oconee County which are good neighbors with the large poultry farms in the area--a situation which would be unheard of in most of the country. This community has proved that it can be the ideal partner for such an important facility, and that the center will not only be an integral and appreciated part of our life, but also a way for us to give back to both the study of science and to this great nation which has benefitted this area so much.

Sincerely,

Jonathan E. Laster  
[REDACTED]  
[REDACTED] GA [REDACTED]

Comment No: 1      Issue Code: 24.2

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

**Laufenberg, Jim**

**Page 1 of 1**

**WD0450**

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**From:** Jim Laufenberg [jbl@gxbio.com]  
**Sent:** Friday, August 22, 2008 3:51 PM  
**To:** NBAFProgramManager  
**Cc:** Angela Kreps  
**Subject:** NBAF in Kansas

1| 24.4

As an executive in the bioscience industry and located in the state of Kansas, I would like to emphasize how well suited we are to house NBAF. I have found ready access to local scientific expertise, business related state resources, and research organizations.

Kansas is a great place to work and has a phenomenal animal and agricultural knowledge base. I want to wholeheartedly endorse the efforts to bring NBAF to our state.

Sincerely,  
Jim Laufenberg  
President and CEO  
ImmunoGenetix  
8527 Bluejacket Street  
Lenexa, KS 66214  
888.744.9246  
[jbl@gxbio.com](mailto:jbl@gxbio.com)  
[www.ImmunoGenetix.com](http://www.ImmunoGenetix.com)

Comment No: 1

Issue Code: 24.4

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

**Laws, John**

**Page 1 of 1**

PD0217

August 22, 2008

1| 24.5 | This is John Laws. I am a resident of [REDACTED] Mississippi and I'm calling to express my support of the National Bio and Agro Defense Facility being located in Flora, Mississippi.

Thank you.

Comment No: 1

Issue Code: 24.5

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

Leafstedt, James

Page 1 of 2

WD0105

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**From:** Benjamin Richey [brichey@usaha.org]  
**Sent:** Friday, July 25, 2008 10:24 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF EIS Comments

July 25, 2008

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

To Whom it May Concern:

The United States Animal Health Association (USAHA) is appreciative of the opportunity to comment on the Environmental Impact Study for the National Bio- and Agro-Defense Facility (NBAF).

1|24.0 High containment biosafety level (BSL)-3, BSL-3 Ag, and BSL-4 laboratory space is vital to our ability for early detection and response to any potential emerging and foreign animal disease or bioterrorist event.

Laboratories must be capable of handling disease agents in a manner that allows the safe handling of diagnostic materials and the ability to conduct research to detect and prevent emerging and exotic infectious agents.

These same laboratories assist livestock producers, veterinarians, pet owners, wildlife managers and public health professionals in every state on a daily basis by providing surveillance and diagnostic services for these diseases.

In 2007, USAHA approved the following resolution:

*The United States Animal Health Association (USAHA) supports continuing operation of existing, and construction of new, high-containment biosafety laboratories. Furthermore, USAHA recommends funding and coordination by federal agencies, including the United States Department of Agriculture (USDA), for maintaining regulatory oversight of these laboratories.*

USAHA encourages the Department of Homeland Security, with collaboration of USDA, to use the EIS as part of its thorough review for the decision-making process to provide facilities that best meet the need of the U.S. animal emerging and foreign diseases research, surveillance and diagnostics.

Sincerely,

Comment No: 1      Issue Code: 24.0  
DHS notes the commentor's support for the NBAF.

**Leafstedt, James**

**Page 2 of 2**

**WD0105**

James W. Leafstedt  
President, USAHA

\*\*\*\*\*

United States Animal Health Association  
PO Box 8805  
St. Joseph, MO 64508  
Phone: 816-671-1144  
Fax: 816-671-1201  
www.usaha.org

Lechtenberg, DVM, PhD, Kelly

Page 1 of 3

WD0675

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**From:** Midwest Veterinary Services [mvs@mvsinc.net]  
**Sent:** Monday, August 25, 2008 9:03 AM  
**To:** nbafprogrammanager@dhs.gov  
**Subject:** re: Letter  
**Attachments:** letter.pdf

<sup>1</sup>24.4 | Please find attached a letter of support and my views that the NBAF belongs in Kansas.

Kelly F. Lechtenberg, DVM, Ph.D.  
Midwest Veterinary Services  
1443 Hwy 77  
Oakland, NE 68045  
402-685-6502 (office)  
402-685-6008 (fax)  
e-mail: [mvs@mvsinc.net](mailto:mvs@mvsinc.net)

Comment No: 1      Issue Code: 24.4

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

## Lechtenberg, DVM, PhD, Kelly

## Page 2 of 3

1 Lechtenberg Letter to Support Manhattan, KS NBAF Site WD0675

**M** IDWEST  
**V** ETERINARY  
**S** ERVICES, INC.

Prepared by Kelly F. Lechtenberg, DVM, PhD. Dr. Lechtenberg is the president of Midwest Veterinary Services Inc. and Logan Valley Feeders Inc. of Oakland, NE where he feeds cattle, farms and practices veterinarian medicine. He can be reached at (402) 685-6502 or by e-mail; [kelly@mvsinc.net](mailto:kelly@mvsinc.net).

2|2.0 Kansas has been selected as one of the six possible sites to serve as the focal point of our nations defense against biologic weapons and agro-terrorism for the next generations. In my opinion, Kansas is clearly the most appropriate location for this facility.

1Cont.|24.4

3|23.0 The scientific endeavors to be conducted inside the layers of safety of the NBAF will make all possible sites equally safe. The predecessor facility at Plum Island is located on an island because that was part of biosecurity plan of the day. All aspects of security and biosecurity systems have evolved to the point that a strip of water no longer contributes significantly to the overall biosecurity plan. I am familiar with the proposed biosecurity technology and I am comfortable that location of the NBAF in Manhattan, Kansas will be safe.

4|23.0

3Cont.|23.0

5|21.0 As a third generation Nebraska livestock producer, I am certainly concerned about the impact that a foreign animal disease break could have on the animals involved, livestock producers, their families, and the small towns and cities across the country that are intimately tied to agricultural economy. I want to see the brightest minds in the world and the most experienced animal husbandry personnel working to protect our food supply from those that would choose to harm us and our economy. I believe that locating the facility in Kansas provides that highest access to and highest retention of the personnel needed. I'd like to see the NBAF operated and staffed by people that grew up in the livestock industry and became scientist rather than by scientist that found a good job at a lab. The bio-security of the NBAF is not only about science, but about integrity and commitment to bio-security. I pray that the NBAF is ultimately staffed by a high percentage of people that are ultimately protecting their own 3<sup>rd</sup>, 4<sup>th</sup> and 5<sup>th</sup> generation family traditions and livelihoods in production agriculture.

1Cont.|24.4

3Cont.|23.0

1443 Highway 77 OAKLAND, NE 68045-5515 PHONE(402) 685-6502 FAX(402) 685-6008

Comment No: 2 Issue Code: 2.0

DHS notes the commentor's statement.

Comment No: 3 Issue Code: 23.0

DHS notes the commentor's opinion that the proposed NBAF research could be safely conducted at the Manhattan Campus site.

Comment No: 4 Issue Code: 23.0

DHS notes the commentor's statement.

Comment No: 5 Issue Code: 21.0

DHS notes the commentor's statement.

Lechtenberg, DVM, PhD, Kelly

Page 3 of 3

2 Lechtenberg Letter to Support Manhattan, KS NBAF Site

WD0675

1Cont.,24.4;  
6|15.4

As a businessman, is impossible to ignore the economic implication to the local economy. Our small company has just over 30 employees. I appreciate the impact of providing good jobs. NBAF will be good for Manhattan and the surrounding region. The NBAF in Kansas will be good for the nation.

7|8.4

Collaborative scientific opportunities abound if the NBAF is placed in Manhattan. The proposed site is adjacent to Pat Roberts Hall, the recently completed BL-3+ Ag facility and to the College of Veterinary Medicine. KSU is the home to the finest food animal veterinary program in the world. The work conducted in the NBAF will primarily be on food producing animals. It makes sense to have access to the finest food animal veterinarians in the world with continuous access to the young scientist that will come through the program at KSU.

8|1.0;  
1Cont.,24.4

As a veterinarian and scientist, I understand the concern of our nation's producers. Infectious disease agents can be ravaging, but they are not magic. Our challenges lie in obtaining most complete understanding possible of the infectious agents of national security interest. Our opportunity for a safer future lies in our ability to learn more about the risks we face, educate of those involved and continue to develop procedures and technologies to mitigate risks posed by our enemies. I believe that those opportunities will be realized most completely, most efficiently and most securely in Manhattan, KS.



Comment No: 6 Issue Code: 15.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative. The economic effects of construction and operation of the NBAF at the Manhattan Campus Site Alternative are included in Section 3.10.4 of the NBAF EIS.

Comment No: 7 Issue Code: 8.4

DHS notes the commentor's statement.

Comment No: 8 Issue Code: 1.0

DHS notes the commentor's statement.

LEcuyer, Christina

Page 1 of 1

WD0843

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**From:** Christina L'Ecuyer [bizco@bluevalley.net]  
**Sent:** Monday, August 25, 2008 7:39 PM  
**To:** NBAFProgramManager  
**Subject:** nbaf in Manhattan, KS

1| 5.4 | NBAF belongs in Kansas on the merits due to our unique ability to protect America's food supply and  
2| 8.4 | agricultural economy. It is the best location to provide the research expertise and infrastructure, access  
to talent, proximity to animal-health industry, public support and state cost share. It is centrally located in  
the agro science/animal health corridor, and has the essential educational, cultural and quality of life  
requirements for the personnel who would man the facility as well.

3| 24.4 | Thank you for choosing Kansas.

Christina L'Ecuyer  
Washington County Economic Development  
Business Coordinator  
785 325 2638  
www.washingtoncountyks.net

Comment No: 1                      Issue Code: 5.4

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

Comment No: 2                      Issue Code: 8.4

DHS notes the commentor's statement.

Comment No: 3                      Issue Code: 24.4

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

Lee, Anita

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WD0013

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**From:** Ken or Anita Lee [kenlee@gwtc.net]  
**Sent:** Wednesday, June 25, 2008 9:40 PM  
**To:** NBAFProgramManager  
**Cc:** Ken or Anita Lee; Bill Kluck; Craig & Pat Shaver  
**Subject:** Letter to Department of Homeland Security on Plum Is. Res.  
**Attachments:** Plum Island Resolution.doc

## Meade County Natural Resource Committee

June 23, 2008

Department of Homeland Security:

This resolution was written by the Meade County, South Dakota, Natural Resource Committee and passed unanimously by the Meade County, South Dakota, Commission on June 6<sup>th</sup>.

Cattle production is the number one industry in this county, as it is in much of the state. This issue is vitally important to the producers of this state, as it should be to all residents.

<sup>1/25.0</sup> We don't understand why the Department of Homeland Security would think moving this dangerous facility into cattle country would make our homeland more secure! We should remember Dwight Eisenhower's words when he warned of 'destroying from within that which we are trying to protect from without'.

Sincerely,  
Meade County  
Natural Resource Committee,  
Anita Lee, Reporter  
[Kenlee@gwtc.net](mailto:Kenlee@gwtc.net)  
15870 209<sup>th</sup> Place  
Sturgis, SD, 57785

Comment No: 1

Issue Code: 25.0

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

Lee, Anita

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### Meade County Resolution against moving the Plum Island Animal Research Facility

*Whereas*, foot and mouth disease is deadly to cattle, sheep, goats, deer, elk, antelope, and bison, and

*Whereas*, foot and mouth virus can be carried on a worker's breath or clothes, or vehicles leaving a lab, and is so contagious it has been confined to Plum Island, New York, for over 50 years—far from commercial livestock. The existing lab is 100 miles northeast of New York City, accessible only by ferry or helicopter. Researchers there who work with live viruses are not permitted to own animals, and they must wait at least a week before attending events where animals might perform, and

*Whereas*, an epidemic in 2001 devastated Britain's livestock industry when the government slaughtered 6 million sheep, cows, and pigs. In 2006, Britain's health and safety agency concluded that another outbreak of the virus probably escaped from a site shared by a government research center and a vaccine maker, and

*Whereas*, in Surrey, England, in 2007, there was a release of foot and mouth disease from a lab which was discovered only after cattle were found to be infected. The outbreak was traced to cracked sewer lines, which leaked material, creating mud, which was carried off the site by automobiles, and

*Whereas*, wildlife is a part of the custom and culture of all states and the numbers greatly surpass the wildlife population in England, and

*Whereas*, cleanup of a foot and mouth outbreak includes preemptive slaughter of all susceptible animals, and animals and insects which carry the virus. Buildings which cannot be adequately decontaminated must be burned, and travel in the contaminated area must be controlled, and

*Whereas*, A 2002 Purdue University study estimated an outbreak of Foot-and- Mouth disease would cost the US livestock industry 10 to 33 billion dollars. The cost in worldwide food shortages and increased food prices is immeasurable, and

*Whereas*, animals can be vaccinated against foot and mouth but this action would remove the United States from the 'Foot and Mouth Free' list and prohibit beef export, and

*Whereas*, Control of the Research facility was transferred from the Department of Agriculture to the Department of Homeland Security in 2003. The DHS wants to move the facility to a site in Georgia, Texas, Kansas, North Carolina, or Mississippi. The new lab will also study diseases that can be transferred from animals to humans, and

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*Whereas*, if one of these diseases is released, the consequences for the community may be very grave. These diseases can be transmitted, variously, by air, mosquitoes, ticks, and other parasitic insects, and by contact with a person or surface material bearing the disease. Incubation periods vary considerably, which means that by the time an outbreak is discovered, the disease may have spread considerably. Because there are no treatments for these diseases, infected animals must be quarantined and destroyed. As to those diseases to be studied at the site which can also affect humans, it remains to be seen how Homeland Security will choose to deal with infected humans, or those suspected of carrying the infection, and

*Whereas*, the lab at Plum Island has had at least one accidental pathogen release within the facility, and

*Whereas*, The Department of Homeland Security is currently investing money to improve and upgrade the Plum Island facility, and

*Whereas*, Plum Island is on the list of possible sites for the new National Bio-and Agro-Defense Facility which is planned to replace the existing facility, and

*Whereas*, over half of the 50 largest pharmaceutical companies, including Bayer, GlaxoSmithKline, Novartis, Hoffman-LaRoche, Astra Zeneca, and Merck, are foreign companies.

*Therefore be it resolved* that the facility remain on Plum Island New York, where it can be isolated from both domestic and wild animals.

*Be it further resolved* that if the present facility at Plum Island must be closed, we rely on the expertise at all the existing laboratories in other countries to develop treatments or vaccines for these diseases.

Moved, passed, and adopted this \_\_\_\_\_ day of \_\_\_\_\_, 2008

Meade County Commission

Approved: \_\_\_\_\_  
Robert Mallow, Chairman

Attest: \_\_\_\_\_  
Lisa Schieffer, Auditor