

Lou, May

Page 1 of 1

PD0123

August 20, 2008

Hello,

My name is May Lou. I'm a retired teacher and I live in [REDACTED] Georgia.

1| 25.2 | I am calling to say that I do not support the idea of the location of the bio hazard plan in
Athens, Georgia. I think our...I think our little city is way too small to support
something like this. I feel like our current drought situation is way too serious to support
2| 12.2 | the hundreds of thousands of gallons of water that it's going to take per day. I think it
will...maybe not tax you, but will tax the little citizens of this area.

3| 5.2 | I feel like the area in which we live, that it's so close to elementary schools, and so close
to people. It just wouldn't be a good location.

4| 24.1 | I'm really....I really am pushing for it to be in an area... it just seems logical that it should
stay at Plum Island, despite the fact that you think it would be cheaper to build new. I
don't...in my experience with building, I just think that there's always...it always costs a
lot more than you think and I really believe in recycling and re-using areas, and I think
that staying on Plum Island would be the best...the best choice at this moment and time.

Thank you for listening to me.

Bye.

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: 12.2

DHS notes the commentor's drought concerns. As described in Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. Section 3.7.3.1.1 describes the potential potable water sources, the Middle and North Oconee Rivers and the Jackson County Bear Creek Reservoir.

Comment No: 3 Issue Code: 5.2

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 effects on the Athens community including schools are discussed in Section 3.10.3.

Comment No: 4 Issue Code: 24.1

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

Lovern, Beth and Daniel

Page 1 of 1

WD0560

From: Beth Lovern [REDACTED]
Sent: Sunday, August 24, 2008 6:20 PM
To: NBAFProgramManager
Subject: NBAF opposition - Athens
Attachments: NBAFopposition.docx

Dear Mr. Johnson,

1| 25.2 I am writing to voice my strong opposition to the proposed NBAF facility that is being considered for Athens, Georgia. I am not an activist and do not protest any government entity. Instead I am a concerned stay-at-home mom who thinks my family and community will be adversely affected by the NBAF locating only a few miles from my house. There are several points regarding my opposition I would like to explain:

2| 6.2 1) The proposed location for NBAF in Athens is terrible. NBAF is too big for the spot on which it might be built. It would seriously disrupt the commute of many people, including my husband, as this is the standard way
 3| 17.2 that we drive into town. We frequent the State Botanical Gardens and my kids love the pastoral aspect of South Milledge -- all of which would be irreparably altered by the building of NBAF here. I asked myself, would I want
 4| 16.2 my favorite store to be built here? And my answer is "no."

5| 12.2 2) It is not fair that we as Athens-Clarke County residents have to be so careful with our water with mandated restrictions in drought conditions, yet NBAF will use the nearby Middle Oconee River as its own source for thousands of gallons of water each day. What will happen to the water supply for the rest of us? I would expect much higher rates that would hurt our family's already pinched economic situation. In addition, NBAF will pollute our beautiful Oconee.

6| 19.2 3) Thousands of people live near the proposed site, and they will be put at potential risk to harmful diseases, regardless of the precautions that the government might make. The Department of Homeland Security will not be able to change this perception of risk to human health in this community.

4) I don't know of anybody who lives near the proposed NBAF in Southeastern Clarke County (where I live) who supports it. They are like myself, not activists, and some are even employed by the agricultural departments of the university yet don't want to speak out for fear of their jobs being in jeopardy. When the politicians and university leaders talk about how they support it, people want to know, where is this coming from? I expect many of them will not be voted back into office.

1 cont.| 25.2 My husband and I are not opposed to the building of the NBAF on principle, but we both think it will be a terrible thing for it to come to Athens.

Thanks for considering our comments.

Beth Lovern
 Daniel Lovern

P. S. Attached is a letter-style copy of these comments

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: 6.2

DHS notes the commentor's concern. DHS held a competitive process to select potential sites for the proposed NBAF as described in DEIS Section 2.3.1. One of the criteria was that the proposed sites must be a minimum of 30 acres in size. The 67-acre South Milledge Avenue Site meets that criteria.

Comment No: 3 Issue Code: 17.2

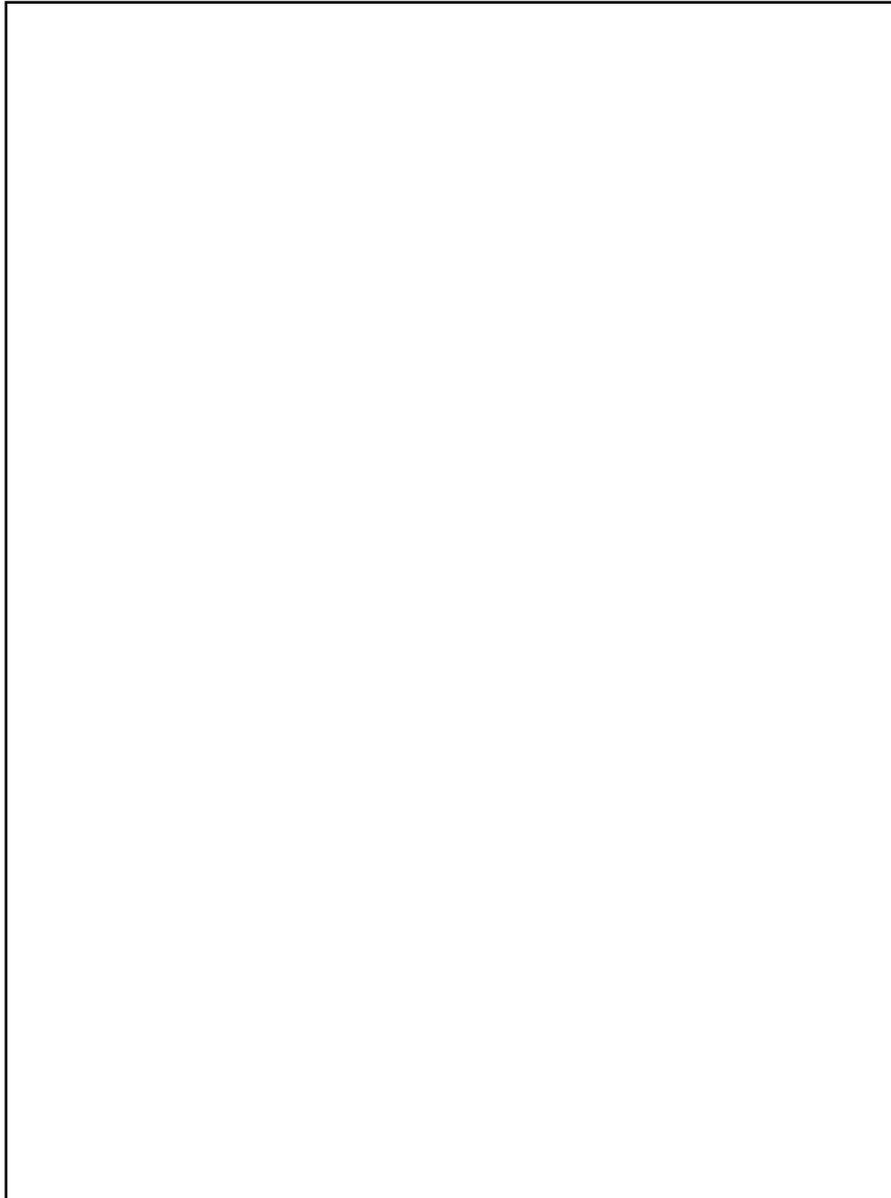
DHS notes the commentor's concern about the traffic congestion in the area of the South Milledge Avenue Site and the future impact of the NBAF operation on the area's transportation infrastructure. A discussion of the planned improvements to the area's primary transportation corridors of South Milledge Avenue and Whitehall Road to alleviate current and future traffic congestion resulting from the NBAF operation at the South Milledge Avenue Site is located in Section 3.11.3.3.1 of the NBAF EIS. All planned improvements are per the recommendations of the Department of Transportation and the Public Works Department as of 2007.

Comment No: 4 Issue Code: 16.2

DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 of the NBAF EIS, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. However, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden as indicated in Sections 3.8.3.2 and 3.8.3.3. Only minimal indirect effects would occur from operations due to increases in light and noise.

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. The South Milledge Avenue Site alternative would have access to 3 surface water resources: the North Oconee River, the Middle Oconee River, and the Jackson County Bear Creek Reservoir. The access to 3 surface water resources will help ensure the availability of water in the event that any one of those sources becomes inadequate. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.13.4 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid



waste. Sections 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 6 Issue Code: 19.2

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 of the NBAF EIS. The risks were determined to be low for all site alternatives. 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. 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.

Lowery, Ronda

Page 1 of 1

WD0274

From: Ronda Lowery [REDACTED]
Sent: Thursday, August 14, 2008 5:05 PM
To: NBAFProgramManager
Subject: sites

1|24.5; I would like to say that I think the National Bio and Agro Defense Facility would be a great asset to Flora.
2|15.5; Flora and the surrounding community would be a great area for the facility to locate to. I am all in favor
for this industry to help our economic growth and quality of life for our citizens. Please select Flora as the
site for the NBAF.

Ronda Lowery
[REDACTED] MS

Comment No: 1 Issue Code: 24.5

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

Comment No: 2 Issue Code: 15.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative. The economic and quality of life effects of the NBAF at the Flora Industrial Park Site Alternative are included in Section 3.10.5 of the NBAF EIS.

Lowry, Doug

Page 1 of 2

WD0383

From: Doug Lowry [REDACTED]
Sent: Tuesday, August 19, 2008 7:24 PM
To: NBAFProgramManager
Subject: Athens Ga Comment

1| 24.2 My name is Doug Lowry. I am the [REDACTED] for [REDACTED]. The National Bio and Agro-Defense Facility, has become one of the most important opportunities that Athens-Clarke County has seen in a generation.

cont| 1| 24.2 Although the decision to locate this facility here will ultimately rest with federal officials, local government may nonetheless play a vital role in the success of these efforts. Other things being equal, the federal government officials in charge of deciding on the location of these facilities are less likely to choose to locate in a community where they believe a facility will be unwelcome by the citizens. For this reason, it is very important that local government officials who have been elected to represent local citizens make their views known about the NBAF.

2| 15.2 Virtually everyone recognizes that we need to attract industry that brings high paying jobs. Athens-Clarke County is one of the poorest counties in the country with a population of over one hundred thousand. Every issue that has the potential to affect economic development and financial opportunities for our citizens, especially the poorest among us, is paramount in considering any issue, including the NBAF proposal. I would like to emphasize those on the lowest end of the economic ladder because I agree with Franklin Roosevelt when he said in his second Inaugural address, "The test of our progress is not whether we add more to the abundance of those who have much; it is whether we provide enough for those who have too little."

The only issue more important than raising the standard of living of our citizens, is protecting the safety of all residents, who are also our families, our friends and our neighbors.

If I believed that any economic development proposal would harm the people or the resources of our region, I would lead the opposition to that proposal. I have been gratified to learn that every one of the elected officials, government representatives and every employee of the University of Georgia with whom I have spoken feel exactly the same way.

I know some people's mistrust of our current federal administration has led them to believe that this facilities true purpose is different than what has been presented. I also distrust much of what we have been told by the

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: 15.2

DHS notes the commentor's support for the South Milledge Avenue Site Alternative. The economic effects of the NBAF at the South Milledge Avenue Site are included in Section 3.10.3. Labor income during construction is projected at approximately \$150 million while operation of the NBAF would generate approximately \$28 million in wages annually.

Lowry, Doug

Page 2 of 2

WD0383

Bush/Cheney regime. I will never defend many, if not most of the actions of our current federal administration.

However, we must not let our disgust and anger with the administration in Washington blind us to a genuinely safe, once in a lifetime opportunity to bring in great jobs, and not just few great jobs because eventually the new jobs, and their multiplicative effect, could number in the thousands.

I truly regret the mistrust that exists between our citizens and our federal government. At the same time, I believe, this mistrust has created a response to this proposal from a small minority of citizens that is not accurate in its target. Because of these misdirected actions, the risks that are inherent in this facility are being overblown and the benefits overlooked. The facts are that NBAF will be a safe facility that will be operated in a responsible manner and will become a tremendous economic benefit to our entire region.

I understand some people are fearful of the proposed NBAF facility, and if I believed everything that has been said by the minority who are opposed to all such facilities, I too would oppose the NBAF. If I believed every false rumor, if I believed the orchestrated campaign of misinformation about the dangers of the facility, I would be a leader in a fight to stop this NBAF research center proposal. However, let me say here to all of you, that I do not believe these false rumors. I do not believe this campaign of misinformation and I will not allow my support of this valuable proposal to be swayed by the fear mongering of a few people.

cont| 1| 24.2 My name is Doug Lowry. I am the elected representative for [REDACTED] in [REDACTED] and I enthusiastically support the initiative to bring NBAF to Athens.

Lowther, Natalya

Page 1 of 2

WD0546

From: Natalya Lowther [REDACTED]
Sent: Monday, August 25, 2008 1:25 AM
To: NBAFProgramManager
Subject: Public comment: I oppose NBAF on the mainland

- 1) 25.0
2) 5.0 I am writing to formally register my opposition to the proposal to build a National Bio-and Agro-Defense Facility anywhere in the US mainland.
- 3) 27.0 I raise sheep on a small sustainable farm about [REDACTED] miles downwind and downstream from [REDACTED] KS. I've been following a highly selective breeding program for over 12 years. My aging parents live in [REDACTED] area, as does my sister and her family. Many of my friends here send their children to [REDACTED] for college. Through my church and shepherding activities, I have friends and business connections throughout the US and Canada.
- 4) 25.4 NBAF in Manhattan threatens all that. I say NO.
- 2 cont.) 5.0 NBAF belongs on an island, where natural physical barriers reinforce man-made ones, as a backup in case of releases. On my farm, in pasture and garden, I've seen before my very eyes how even large life forms can be spread through agencies we humans can't control.
- 5) 21.4 There are too many very real risks in siting such a facility in a location like Manhattan. At best, there is human error and mechanical failure. Even with redundancies, these can wreak unpredictable havoc. Next, this site is also in an area near a geological fault line, where tornados have repeatedly caused significant damage, where ice storms can create devastating problems with power transmission. Such powerful natural forces cannot be reliably controlled or predicted. Then there are more sinister scenarios that are all too easy to imagine, but have happened in various other contexts in recent years: terrorist acts, psychopaths, acts of war.
- It seems like only a matter of time before a release of some disease organism could occur from such a facility. If that happened:
- 6) 19.4 My sheep might have to be slaughtered, wasting years of breeding and ruining me financially.
- Manhattan could be quarantined, making it impossible for me to see my family. Friends' families might also be affected if students are unable to return home to their families.
- A quarantine could put thousands of lives at risk, as Manhattan depends on basic supplies and services from a broad geographical area.
- I might not be able to cross the border to visit my friend's farm in Canada. Friends from Canada might not be able to return home after coming here.
- My farm depends on volunteers from across the country and around the world. International travel in all directions from Manhattan could be severely affected by other countries exercising biosecurity measures in the event of a release.
- On occasion, I use veterinary resources at KSU for sheep health challenges. If Manhattan were quarantined, I and thousands of other livestock, horse, camelid, and other animal owners would be cut off from this essential resource.
- Fort Riley might have to be included in a quarantine to contain a outbreak, which might seriously put

Comment No: 1 Issue Code: 25.0

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

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's suggestion. As described in Section 2.4.3 of the NBAF EIS, other potential locations to construct the NBAF were considered during the site selection process but were eliminated based on evaluation by the selection committee. It was suggested during the scoping process that the NBAF be constructed in a remote location such as an island distant from populated areas or in a location that would be inhospitable (e.g., desert or arctic habitat) to escaped animal hosts/vectors; however, the evaluation criteria called for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. The Plum Island Site is an isolated location as was suggested while still meeting the requirements listed in the Expressions of Interest.

Comment No: 3 Issue Code: 27.0

DHS notes the commentor's statement.

Comment No: 4 Issue Code: 25.4

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

Comment No: 5 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.

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.

Lowther, Natalya

Page 2 of 2

WD0546

national security at risk.

6 cont. | 19.4

I am not saying that I oppose doing the research that will be conducted at these facilities. It just makes sense to do it somewhere physically separated from the busy, complex web of human and animal life in a bustling town like Manhattan. If there were an outbreak, there would be so many ready hosts to exacerbate it, and so many vectors to carry it unpredictably within and outside any quarantine area. There are a lot of wildlife and natural areas in and around Manhattan, even in the most developed areas. I've observed on my own farm how soil can be carried long distances by tiny creatures such as moles, worms, birds, ants, etc. Once an organism escaped, there would be no stopping it. And there are so many large population centers literally downwind and downstream--Topeka, Lawrence, Kansas City and more. Where would it stop?

2 cont. | 5.0

So, build it if you will, but please put it on an island far from livestock production areas.

Thank you,
Natalya Lowther



KS

Get thousands of games on your PC, your mobile phone, and the web with Windows®. [Game with Windows](#)

Comment No: 6

Issue Code: 19.4

DHS notes the commentor's concern. 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. 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 the NBAF. 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. Procedures and plans to operate the NBAF will include community representatives as described in Section 2.2.2.6 of the NBAF EIS.

Luebke, Paul

Page 1 of 1

WD0533

From: Rep. Paul Luebke [REDACTED]
Sent: Sunday, August 24, 2008 11:01 PM
To: NBAFProgramManager
Subject: your NBAF proposal for Butner, NC

Dear DHS Officials,

As an 18-year member of the North Carolina House of Representatives, with special expertise in issues of economic development, I write to oppose the option of Butner as the site for a new NBAF.

1| 25.3 Butner is part of a fast-growing metropolitan area, encompassing not only the county in which the town is located (Granville County), but also the neighboring counties which include the cities of Durham, Raleigh, Cary, Chapel Hill-Carrboro, and Hillsborough. With so many persons living close to Butner, that town should be eliminated from consideration by DHS

officials.

2| 5.5 By contrast, the Mississippi region that is one of the NBAF sites is far less-populated. More importantly, central Mississippi needs the economic stimulation that the influx of scientists, and others working on the NBAF, would bring.

As I understand the press reports, most persons in central Mississippi are happy that their state is on your "short list."

Thank you for your consideration of this letter.

Sincerely,
 Rep. Paul Luebke
 House District 30
 Senior Chair, House Finance Committee

Comment No: 1 Issue Code: 25.3

DHS notes the Representative's opposition to the Umstead Research Farm Site Alternative due to its proximity to population.

Comment No: 2 Issue Code: 5.5

DHS notes the Representative's opposition to the Umstead Research Farm Site Alternative in favor of the Flora Industrial Park Site Alternative.

Lynn, David

Page 1 of 1

PD0102

August 19, 2008

1|24.2 My name is David Lynn and I live at [REDACTED] Georgia. I serve as an elected official on the [REDACTED] representing [REDACTED]

I'd like to voice my support for the proposed NBAF facility in Athens, Georgia.

Thank you very much.

Comment No: 1

Issue Code: 24.2

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

Lyon, Charlotte

Page 1 of 1

WD0208

From: Charlotte Lyon [REDACTED]
Sent: Wednesday, August 06, 2008 9:05 PM
To: NBAFProgramManager
Subject: Oppose the Bio Defense Lab in Granville County, North Carolina

Dear Directorate Johnson,

1|25.3 | As a property owner in [REDACTED] and a resident in [REDACTED] I am emailing to let you know I strongly
 2|12.3 | oppose the National Bio Agro Defense Facility being put in Granville County. Many residents, including
 3|21.3 | those that reside on my property, rely on well water for drinking and all other purposes. Wake County's
 water supply is from the Falls Lake, which is downstream from the proposed site. I do not think this facility
 is safe, nothing is 100% safe, and the risk is too high.

Place this facility elsewhere if you must, but not in Granville County, Wake County or any area near here.

Sincerely,

Charlotte Lyon

Comment No: 1 Issue Code: 25.3

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

Comment No: 2 Issue Code: 12.3

DHS notes the commentor's watershed concern. Section 3.13.8 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 3 Issue Code: 21.3

DHS notes the commentor's concern. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 and Appendix E of the NBAF EIS. 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 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.

Lyon, Janie

Page 1 of 1

125.3

NCD009

I do not ^{want} this A10 in Butler
we have fought for Butler before
& we will again.

Janie Lyon

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	TOLL-FREE FAX
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	1-866-508-NBAF (6223)

Comment No: 1 Issue Code: 25.3

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

Lyon, Otho C. and Ernestine

Page 1 of 3

MD0101

YOUR COMMENTS TO DEPT. OF HOMELAND SECURITY NEEDED!!

Deadline: August 25, 2008

Send to:

MAJOR PROBLEMS WITH THE DRAFT ENVIRONMENTAL IMPACT STATEMENT — NAT'L BIO- AND AGRO- DEFENSE FACILITY

- 1| 23.0 | Draft EIS
- Doesn't show any site-specific design details for the facility, thus making it nearly impossible to determine whether it is adequate to prevent escape of potentially lethal organisms.
- Fails to include in its risk assessment calculations the increased risk to public health and the environment as the facility ages, particularly if inadequate funds for safety systems, maintenance and upgrades are available.
- Doesn't list the items (such as a Central Utilities Plant, the cost of running utility services to the site, the cost of prepping the site and building the concrete pad) that the host locality and state are expected to pay for, nor the site-specific costs for those items.
- 2| 20.0 | Doesn't include an assessment of the impact on health and safety of over 7,000 residents of hospitals, residential schools and prisons located within a few miles of the proposed facility.
- cont.| 1| 23.0 | Fails to discuss facility security.
- 3| 21.0 | Fails to discuss the available emergency response in the event of a release, or the lack of relevant training for local first responders.
- cont.| 1| 23.0 | Fails to provide for adequate monitoring or public disclosure of organisms being studied on site or any releases identified.
- 4| 12.0 | Fails to look at the potential impacts of stormwater from the site to public streams and reservoirs, except during the construction phase for the Facility, when potential air emissions and spills could result in impacts on waters such as Falls Lake that serve as public recreational waters or drinking water supplies.
- 5| 15.0 | States that the economic impact of a release of highly transmissible Foot and Mouth Disease could be "significant" but vastly underestimates the impact at about \$4 Billion dollars, while a release in Great Britain (an island nation with smaller livestock industry) caused more than \$17 Billion in losses.

Comment No: 1 Issue Code: 23.0

DHS notes the commentor's concern that site-specific design details for the NBAF are not included in the NBAF EIS. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The analysis conducted in the NBAF EIS was based on conceptual design plans posted on the DHS website. More detailed design plans would be developed as the project moves into the final design phase. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols, including detailed construction plans, would be developed 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.

DHS notes the commentor's concern for security for the NBAF operation at the Umstead Research Farm site. Regardless of location, the NBAF would have the levels of protection and control required by applicable DHS security directives. 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. A separate Threat and Risk Assessment (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 would be 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-biocontainment pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

DHS also notes the commentor's concern with monitoring for disease releases. DHS would have site-specific standard operating / monitoring procedures 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.

DHS notes the commentor's concern with the potential use of contractors to secure the NBAF. The decision to use government or private security forces to protect the NBAF has not been made. In all likelihood that decision will be made after the NBAF Record of Decision (ROD) is issued. Should the ROD call for the design, construction, and operations of the NBAF then site specific decisions would include the determination to use government or private security forces to protect the NBAF. Regardless of the decision, NBAF would have the levels of protection and control required by applicable DHS security directives.

Comment No: 2 Issue Code: 20.0

DHS notes the commentor's concern. DHS is aware of and has considered the presence of the health and correctional facilities, described in Section 3.10.7.1 of the NBAF EIS. 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. A site-specific emergency response plan would be developed and coordinated with the local emergency response agencies for all potential emergency events including accidents at the NBAF, and which would include stipulations for any special-needs populations including institutionalized populations.

Comment No: 3 Issue Code: 21.0

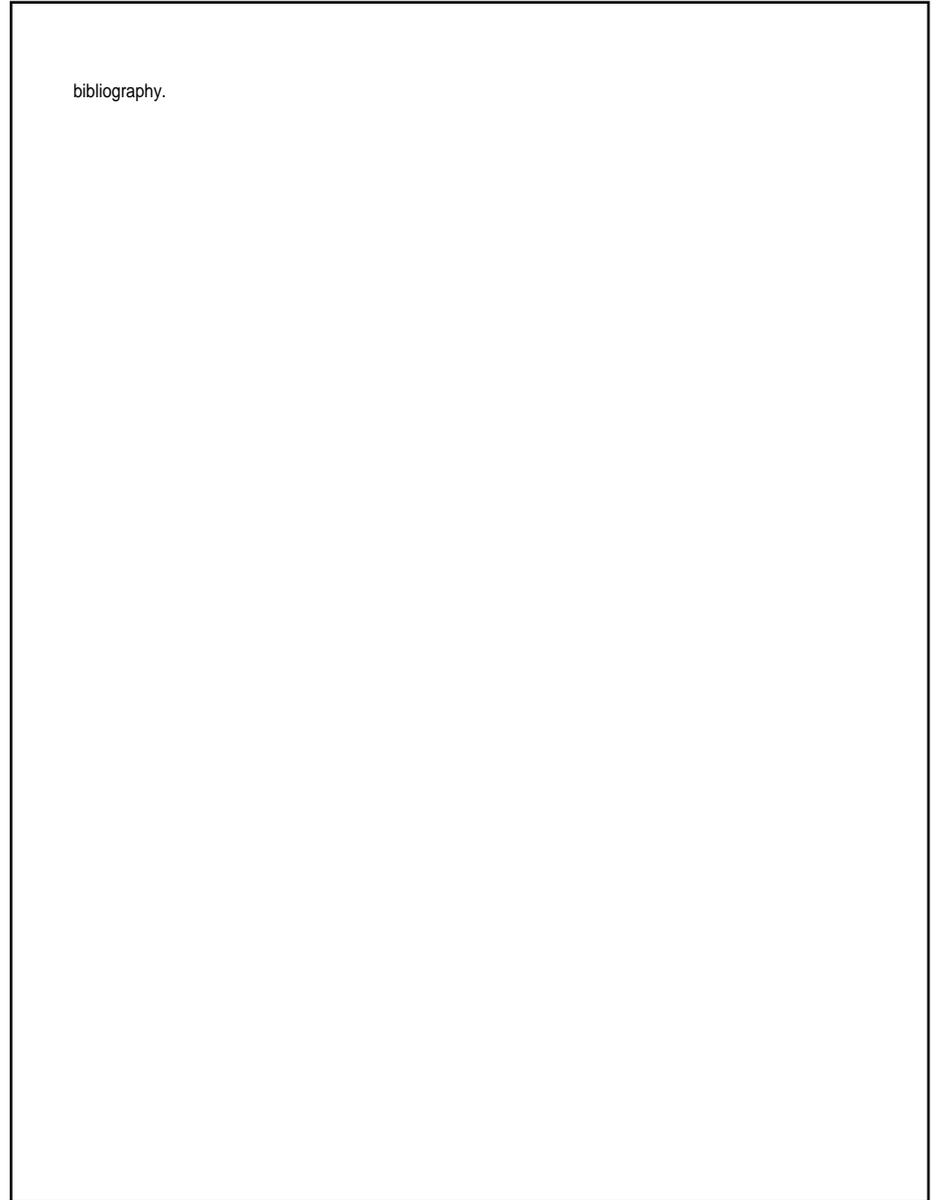
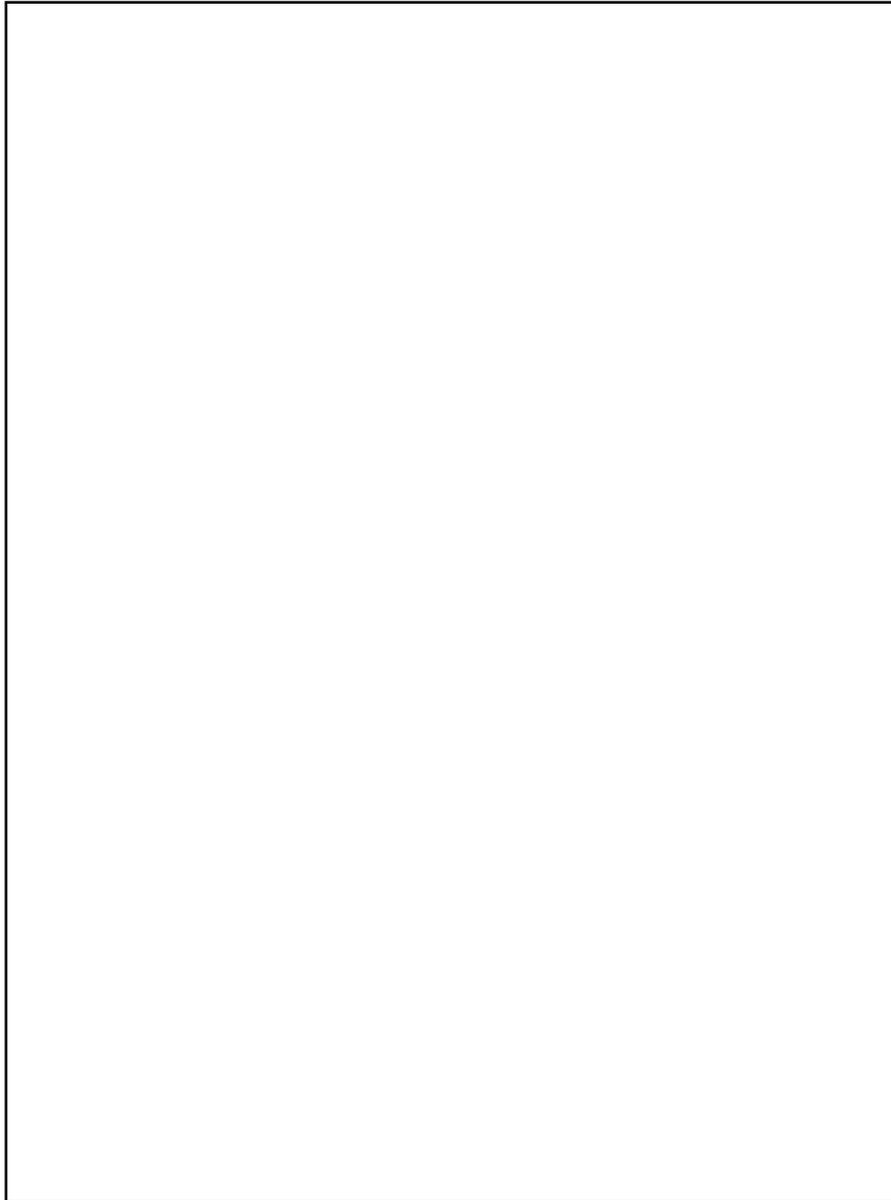
DHS notes the commentor's concern that site specific operational, safety, security and emergency response plans are not included in the NBAF EIS. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The analysis conducted in the NBAF EIS was based on conceptual design plans posted on the DHS website. More detailed design plans would be developed as the project moves into the final design phase. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific operational, safety, security and emergency protocols and plans would be developed that would consider the diversity and density of human, livestock and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans would also include training for local law enforcement, health care, and fire and rescue personnel.

Comment No: 4 Issue Code: 12.0

DHS notes the commentor's stormwater runoff concern. Sections 3.3 and 3.7 of the NBAF EIS describe standard methods used to prevent and mitigate potential spills and runoff affects. Such methods as but not limited to are vegetated swales, retention ponds, pervious pavement, and beneficial reuse of captured or redirected stormwater. The NBAF operation will be required to prepare and implement operational SWPP and SPCC plans.

Comment No: 5 Issue Code: 15.0

DHS notes the commentor's concerns. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the potential economic effect would be significant for all sites. Appendix D presents a range of potential economic outcomes based on studies, simulations, and documented outbreaks of the relevant pathogens in other countries. The Appendix also makes specific reference to the significant economic impacts that resulted from the outbreak of FMD in England during 2001. For further detail on these studies, DHS refers the commentor to the



Lyon, Otho C. and Ernestine

Page 2 of 3

MD0101	
cont. 3 21.0	<p>Treats all accident scenarios with diseases as though their transmissibility and host characteristics will not change. In fact, dozens of diseases that were originally transmissible only between animals have acquired new characteristics that allowed them to become “zoonotic” and then human-to-human transmissible, such as Ebola virus and HIV.</p> <p>Completely fails to include accident scenarios such as the apparent sabotage by high level biodefense researchers that lead to the Anthrax letters which killed five people in 2001.</p>
cont. 4 12.0	<p>Doesn't account for the increased risk due to the plan to put facility wastewater in underground tanks, with lower level containment, potentially contributing to groundwater contamination.</p> <p>Doesn't account for the fact that the publicly owned SGWASA wastewater treatment plant, with a poor record of holding industries accountable for toxic pollution piped to the plant, has no facilities or testing to remove these dangerous disease organisms.</p>
6 18.0	<p>Fails to identify the system(s) to be used to dispose of the waste and carcasses from the hundreds of animals to be housed at the facility, nor to discuss the potential impacts to air, water bodies, groundwater, and safety from those system(s).</p>
7 19.0	<p>Fails to include any analysis of the potential consequences of a release of diseases such as Newcastle disease and avian flu, particularly given our State's significant poultry production.</p>
cont. 1 23.0	<p>Doesn't discuss the potential consequences of having a non-governmental private contractor operate the facility, which DHS states it is contemplating. How will this impact maintenance, transparency, and public accountability?</p>

Comment No: 6 Issue Code: 18.0

Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As discussed in this section, the final design for the NBAF will probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements.

Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4. of the EIS (Air Quality) assumes that the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse impact. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 of the EIS (Infrastructure) assumes that alkaline hydrolysis will be used to assess the maximum sanitary sewage impacts.

Comment No: 7 Issue Code: 19.0

DHS notes the commentor's concerns regarding the pathogens which NBAF would study. By definition and as identified in Chapter 1, Section 1.1 of the NBAF EIS, BSL-4 facilities are specifically designed to safely handle exotic pathogens that pose a high risk of life threatening disease in animals and humans through the aerosol route and for which there is no known vaccine or therapy. It is because of the risks posed that NBAF is needed in order to provide a modern, integrated high-containment facility to safely and effectively address the accidental or intentional introduction into the U.S. of animal diseases of high consequence. 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.

Lyon, Otho C. and Ernestine

Page 3 of 3

MD0101

Name and complete address:

Otho C Lyon

[REDACTED]

Comment:

would you want your family to live this
close to such a site,

Macomber, Jr., John

Page 1 of 1

PD0036

August 2, 2008

15.1 My name is John H. Macomber, Jr. I live in [REDACTED] New York, and I am 100 percent in favor of upgrading Plum Island Disease Laboratory. It does a wonderful job for this country. We need it and it can't be any worse than any of the other atomic energy plants around us....which I also happen to agree with....so, please make a note of that.

I think Plum Island should be upgraded.

Thank you very much.

Comment No: 1 Issue Code: 5.1

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

Maczka, Paul

Page 1 of 1

WD0664

From: Paul Maczka [REDACTED]
Sent: Friday, August 22, 2008 5:41 PM
To: NBAFProgramManager
Attachments: Paul Maczka.vcf

1|24.5: I live and own a business in [REDACTED] area and would like to support the idea of locating
2|15.5: the facility here. I feel that such a facility could bring high quality jobs and provide opportunities
to that highly educated Mississippians do not currently have available to them. It would also
bring highly educated people to our state who could increase our diversity and improve our
quality of life.



Comment No: 1 Issue Code: 24.5

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

Comment No: 2 Issue Code: 15.5

DHA notes the commentor's support. Section 3.10.7.5 of the NBAF EIS discusses the employment effects of the NBAF operations at the Flora Industrial Park Site. Between 250 and 350 workers are expected to be employed at the proposed NBAF facility, including scientific and support staff and operations, maintenance and security staff. In addition to the jobs at the NBAF facility, the operations and maintenance of the facility would generate an estimated additional 167 jobs at other businesses and organizations located in the three-county area.

Maddox, Caroline**Page 1 of 1**

WD0173

From: CAROLINE CLEVELAN MADDOX [REDACTED]
Sent: Monday, August 04, 2008 3:51 PM
To: NBAFProgramManager
Cc: [REDACTED]
Subject:

To whom it may concern:

- 1| 25.2 | I am writing in protest to the National Biological & Agriculture Defense Facilities that are proposed for the Clarke/Oconee County area. For an area of Georgia with a growing population of young people I find it absolutely preposterous that the government would consider placing a facility in a community that could house potential dangers for the population at large. I am aware that the university is known for its agricultural and biology programming, but there is no need to put the university students and families in the community in a potentially hazardous environment. I hope you will take my thoughts into consideration.
- 2| 19.2 |

Kindest Regards,

Caroline Maddox

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 19.2

DHS notes the commentator'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 of the NBAF EIS. The risks were determined to be extremely low for all site alternatives. 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. 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.

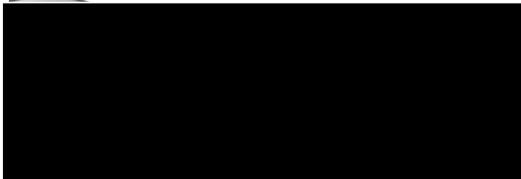
Magee, Amy

Page 1 of 1

WD0131

From: Amy Magee [REDACTED]
Sent: Tuesday, July 29, 2008 10:50 PM
To: nbafterprogrammanager@dhs.gov
Subject: no to nbafter

125.3 | I do not want the bio center located in North Carolina.



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

Mah, Ann

Page 1 of 1

WD0453

From: Larry & Ann Mah [lmah@cox.net]
Sent: Friday, August 22, 2008 3:28 PM
To: NBAFProgramManager
Subject: support for Manhattan

1| 24.4

This is to support the nomination of Manhattan for the NBAF location. Manhattan meets all the criteria set forth in terms of access to talent, expertise, and a location close to those active in the animal health industry (much of the world's animal science research is right here in the Manhattan-Kansas City corridor). We have wide public support for this project and the state government is willing to back that with resources, as we have all during this process. I urge you to put politics aside and choose Manhattan, the best location for NBAF.

Regards,

Ann Mah
State Representative - District 53
Kansas

Comment No: 1 Issue Code: 24.4

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

Majersky, Lisa

Page 1 of 1

WD0138

From: info@athensfaq.org on behalf of Lisa Majersky [REDACTED]
Sent: Thursday, July 31, 2008 11:07 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1|25.2 | The DEIS clearly shows that the Athens, GA site is neither safe nor compatible from an environmental standpoint for the construction of NBAF.
- 2|21.0 | The DEIS discloses an "insectary" where disease-spreading mosquitoes and other "vectors" will be bred. It also discloses that any release of pathogen, because of our warm, humid climate, could cause the disease to become permanently established in our community.
- 3|9.2 | And, how can we as a community evaluate the environmental impact of incineration of thousands of pounds of infected carcasses in Athens, GA when the DEIS only mentions it as a possibility?
- 4|13.2 | Also, the DEIS seems to gloss over the effect of NBAF on the environment of the State Botanical Garden and Important Bird Area in Athens, GA.
- 5|12.2 | NBAF has been promoted by ever-changing "facts" put out by UGA and DHS. Why do you choose to gloss over the real dangers presented by NBAF in the middle of our community? How does DHS propose to deal with our 100-year drought that is still persisting? Do you plan to "trust" Mother Nature just as you ask us to "trust" technology and training to keep a catastrophic accident from occurring?
- 2 cont. | Logic says that the NBAF will be a prime symbolic target for domestic or foreign terrorists, and therefore should not be in the middle of a populated area such as Athens.
21.0
- 1 cont. | Please do not act irresponsibly in the face of such overwhelming evidence. NBAF should not be in Athens.
25.2 | We are strongly opposed to NBAF and will continue to actively work against any effort to bring NBAF to our community.

Sincerely,
 Lisa Majersky

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 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. A discussion of insectary operations is contained in Section 2.2.1 and elsewhere in the NBAF EIS. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, also provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. In addition, information has been added to Chapter 2 regarding operations and containment of arthropod vectors. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the South Milledge Avenue Site is specifically addressed in Section 3.8.9 and Section 3.10.9.1 as well as in Section 3.14.4.1 (Health and Safety). Section 3.10.9.1 discusses the relative suitability of the regional climate of the South Milledge Avenue Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.3.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Comment No: 3 Issue Code: 9.2

DHS notes the commentor's air quality concerns. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Section 3.4.1 describes the methodology used in assessing potential air quality consequences at each site. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used

during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards.

Comment No: 4 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the Important Bird Area (IBA). 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 Botanical Garden with the Whitehall Forest IBA. 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 the Whitehall Forest IBA. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Birds are not susceptible to diseases that may be studied at the NBAF. Although the Draft 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 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: 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.

Mann, Anthony

Page 1 of 2

WD0230

From: info@athensfaq.org on behalf of A. Mann [REDACTED]
Sent: Monday, August 11, 2008 4:48 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Why am I opposed to the placement of National Bio- and Agro-Defense Facility (NBAF) on the southern perimeter of the UGA campus? That site lies exactly 5000 feet from my home on Simonton Bridge Road in Oconee County. My parents have lived there for twenty six years.

Six years ago, at age 19, I was afflicted with Amyotrophic Lateral Sclerosis (ALS, or Lou Gehrig's Disease). ALS is a neuro-degenerative disease that usually kills both upper and lower motor neurons and causes degeneration throughout the brain and spinal cord. It was first described in 1869, but still today, the cause of ALS is not completely understood. There is no cure. Over a period of a few years, the nerves die, resulting in total paralysis. Since the patient retains all mental acuity and tactile sensations, yet is totally paralyzed, some call it "locked in." Without the use of my hands, using "eye-gaze" computer assisted technology, I am writing a book and titling it "Living in a Dying Body."

The disease arises spontaneously and mysteriously, making seemingly random attacks on previously healthy adults. ALS can strike anyone, anytime. Most commonly, the disease strikes people between the ages of 40 and 70. As many as 30,000 Americans have the disease at any given time.

1| 27.0

Lou Gehrig first brought international attention to the disease in 1939 when he abruptly retired from baseball after being diagnosed with ALS. Other notable victims of ALS are: Jim "Catfish" Hunter, Senator Jacob Javits, actor David Niven, creator of Sesame Street Jon Stone, World Welter-weight Boxing Champion Ezzard Charles, NBA Hall of Fame basketball player George Yardley, golf caddie Bruce Edwards, musician Lead Belly, singer Dennis Day, composer Dimitri Shostakovich, former vice president of the United States Henry A. Wallace and U.S. Army General Maxwell Taylor. ALS patients living with the disease include: Stephen Hawking (professor of mathematics at Cambridge University), and two past UGA football players, Danny Danzler and David Schwak.

ALS victims do not suffer pain, but most lose their ability to breathe, thus they die a long slow death by suffocation. It has been called the worst disease known to mankind. In order to assist in the daily bodily functions of the ALS patient, most families incur tremendous expenses and often bankruptcy.

In 2004, I had to withdraw from UGA in my junior year and was moved back into my parent's home. In order to facilitate my needs, my "clinic" -- a house addition -- was erected and furnished with the basics in medical and equipment for my 24-hour care.

Medical science cannot explain how my disease happens. And, science cannot find a cure. Why? Because there are not enough research dollars. Why? Because ALS is so rare that it does not have the public awareness that other diseases do.

Accidents happen. Scientists make mistakes. If a mishap should happen to occur at NBAF, and families near the site are forced to evacuate their homes, what is to become of me -- and my family? My equipment would fill a good sized truck. Would DHS be willing to assist in my re-location? Where could I go during a quarantine of the area around the NBAF site? My family is not rich and cannot afford to move to another home -- far distant from the DHS research on lethal pathogens for which there is no known cure or remedy. I already have the worst disease known to mankind.

5| 25.2 | Since DHS and the University of Georgia cannot answer these questions, my parents and I are opposed to NBAF being placed so near private residential areas in Clarke and Oconee Counties.

Comment No: 1 Issue Code: 27.0

DHS notes the commentor's statement; however, it is not within the scope of the NBAF EIS, which evaluates the environmental impact of the no action alternative and the alternatives for constructing and operating the NBAF.

Comment No: 2 Issue Code: 21.2

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B 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: 3 Issue Code: 19.2

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 of the NBAF

EIS. The risks were determined to be extremely low for all site alternatives. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. The need for an evacuation under accident conditions is considered to be a very low probability event. An evacuation would not be necessary if FMDV were accidentally released from NBAF, since FMDV is not a public health threat. 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 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: 20.2

DHS notes the commentor's concern. A site-specific emergency response plan will 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.

Comment No: 5 Issue Code: 25.2

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

Mann, Anthony

Page 2 of 2

WD0230

6| 5.0 | If their research is as vital as the scientists claim, then why can't they conduct it in a remote area of this vast United States?

Anthony C. Mann


Comment No: 6 Issue Code: 5.0

DHS notes the commenter's concern. As described in Section 2.4.3 of the NBAF EIS, other potential locations to construct the NBAF were considered during the site selection process but were eliminated based on evaluation by the selection committee. It was suggested during the scoping process that the NBAF be constructed in a remote location such as an island distant from populated areas or in a location that would be inhospitable (e.g., desert or arctic habitat) to escaped animal hosts/vectors; however, the evaluation criteria called for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. The Plum Island Site is an isolated location as was suggested while still meeting the requirements listed in the Expressions of Interest.

Mann, Barbara

Page 1 of 1

WD0261

From: [REDACTED]
Sent: Thursday, August 14, 2008 9:28 AM
To: NBAFProgramManager
Subject: No NBAF in Athens!

1|25.2 | I will be at the meeting today in Athens to OPPOSE the NBAF facility in Athens.

Barbara Mann

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

Mann, James

Page 1 of 2

WD0239

From: info@athensfaq.org on behalf of J. Mann [REDACTED]
Sent: Monday, August 11, 2008 4:51 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

1|25.2 | I am OPPOSED to the selection of the site on the University of Georgia campus for the proposed National Bio- and Agro-defense Facility.

The Georgia state law states: "No distilled spirits ... may be sold ... within 200 yards of any school building, educational building, school grounds, or college campus..." Why should not there be an even greater distance regulation that prohibits the state or federal government from conducting experiments on biological hazards within a minimum distance from private residences and college campuses? The proposed NBAF for Clarke County Georgia lies within the University campus. And, it lies within 500 yards from several private homes (and suitable building sites equally close).

2|5.2 | There are many state-owned properties all over the State of Georgia that could suit such a NBAF facility. Almost all of them already have the infrastructure required for the NBAF. The closing of military bases in Georgia, includes Historic Fort McPherson (Atlanta's seventh largest employer with 4,141 jobs, the most of any of the four bases slated for closure in Georgia). Why could not one of these bases be the site for the NBAF? All of the infrastructure required for the NBAF must surely be in place on each one of them.

1 cont. | After considerable study of the situation, I have concluded that if the NBAF is built in Athens, Georgia, the
 25.2 | following negative impacts may result:

3|6.2 | Over 66 acres of some of the last and most beautiful undeveloped land in Athens will be graded and clear-cut to house a building the size of 15 to 20 football fields. The Department of Homeland Security stated at the scoping meeting in Athens on September that "perhaps two stories would be underground." That could be 25 to 30 feet deep. If that is the case, severe construction costs and delays will arise due to the occurrence of bedrock near the surface of the ground. The United States Department of Agriculture Soil Survey of Clarke County, Georgia shows that much of the proposed site is comprised of "Pacolet sandy clay loam," ranging from 6-15 percent slope, is highly eroded and typically, the subsoil extends to a depth of only 39 inches." Not only would the building require blasting of bedrock, all other subsurface infrastructures would likewise. This includes water, lines, sewer pipes and all other underground utilities.

4|11.2 |

5|8.2 | Effluent from the NBAF will have to be pumped uphill (upstream) to the nearest sewage treatment plant. This is at a distance of approximately one mile. This hardly qualifies as "having all of the infrastructures in place," as the University architect, Danny Sniff told the scoping meeting. The blasting of bedrock will cause considerable and substantial disturbance to the nearby residential neighborhoods.

Or, an above-ground sewer pipe will need to be extended along the Oconee River, through the State Botanical Garden of Georgia (SBGG, a STATE institution) to the sewage treatment plant up river from the NBAF. If through the SBGG, citizens using the gardens will be obstructed from access to the river. A very secure fence will be required for the entire distance.

4 cont. | The magnitude of earth disturbance will result in a substantial amount of soil erosion and subsequent siltation and
 11.2 | pollution of the Middle Oconee River. The slopes from the site to the river are 20 to 25 percent in some areas.

3 cont. | The proposed site abuts the State Botanical Garden of Georgia. This site is visited by thousands of citizens every
 6.2 | year. It encompasses 313 acres and borders the Middle Oconee River. More than five miles of nature trails traverse the site. State funds are not sufficient to maintain the grounds. Instead, the Friends of the Garden is the membership

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: 5.2

The South Milledge Avenue Site was proposed by the local consortium in response to the request for expressions of interest and was considered along with the rest of the responses. DHS's alternative site selection process is described in Section 2.3.1 of the NBAF EIS.

Comment No: 3 Issue Code: 6.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Chapter 3, Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area.

Comment No: 4 Issue Code: 11.2

DHS notes the commentor's concern regarding construction at the South Milledge Avenue Site. As described in Sections 3.6.3.2, 3.1.1, and 3.14, excavation volumes, depth to bedrock, depth to the water table, and building codes are measures of a site's constructability.

Comment No: 5 Issue Code: 8.2

DHS notes the commentor's concern regarding the adequacy of the utility infrastructure to support the NBAF operation at the South Milledge Avenue Site Alternative. Section 3.3.3 of the NBAF EIS includes an assessment of the current infrastructure, a discussion of the potential effects from construction and operation of the NBAF, and the identification of any infrastructure improvements necessary to meet design criteria and insure safe operation. Should a site be selected for NBAF, any needed infrastructure improvements to ensure service reliability would be identified in accordance with the final facility design.

DHS notes the commentor's concern that the construction of utility improvements may be disruptive to the community. Section 3.3.3 of the NBAF provides an assessment of current infrastructure, the potential impacts to infrastructure from construction and operation of the NBAF, and the infrastructure improvements required for NBAF operations at the South Milledge Avenue site. Should a site be selected for NBAF, any additional infrastructure improvements to ensure safe and reliable operation would be identified in accordance with the final facility design.

Mann, James

Page 2 of 2

WD0239

- 3 cont. | support group that contributes a substantial portion of the operating revenue for the SBGG. It is probable that the
6.2 | proximity of the NBAF would discourage visitors and decrease the number of contributing members – hence the
loss of operating funds to keep the garden in the condition that the citizens of Georgia expect and deserve.
- 6|15.2 | Due to the probable noise, night-lighting, air quality, noxious smells, and traffic disruption, there is likely to be a
7|17.2 | great impact on the quality of life (and property values) in the nearby residential neighborhoods (one quarter of a
mile from the site). The disturbance of traffic on South Milledge Avenue during the many years of construction and
the laying of utility lines will bring an immeasurable impact to the citizens who use that as their access road to
Athens and the University.
- 8|18.2 | Since there will be incineration of both animal and human body parts, the decrease in air quality is inevitable. Might
9|9.2 | there need to be towering smokestacks? Such would be further impacts on the visual quality of the site in its present
condition.
- 10|10.2 | Are there likely to be helicopter visits to the NBAF? If so, the noise and possible danger of air accidents makes this
facility extremely threatening to the surrounding residents, motorists and university sports teams whose facilities
abut the NBAF site.
- 11|12.2 | A NBAF facility would use as many as 100,000 gallons of water per day. Today, in the middle of the biggest
drought this century, can wise people choose this location when the NBAF could exhaust a great portion of the
water available to the citizens of Athens and the University?
- 12|21.2 | The facility will house some of the world's deadliest diseases. Despite the claims of safety by the DHS and other
officials, there is still great question as to the actual safety of such a BLS 4 operation can be guaranteed to the
citizens whose lives will be affected.
- 13|2.0 | The US Congress has not approved the NBAF. In order for it to be built a federal law that has protected the U.S.
mainland for 60 years would have to be repealed.
- Neither UGA nor Athens nor its citizens will have ANY control or input over what DHS ultimately does with
NBAF or how it is managed. Nor will any of these constituencies have any assurance that the NBAF will not be just
the beginning of as-yet undisclosed other facilities that might be proposed (and built) in conjunction with the NBAF.

James E. Mann

Comment No: 6 Issue Code: 15.2

DHS notes the commentor's concern. Adverse effects to quality of life resources would not be expected with any of the site alternatives and are discussed in Section 3.10. A discussion of the effects of the NBAF on property values is included in Section 3.10, which concluded that there is no empirical evidence that a facility such as the NBAF would reduce property values in the study area. It is possible that with the relocation of highly skilled workers to the immediate area, property values could increase due to an increase in demand.

Comment No: 7 Issue Code: 17.2

DHS notes the commentor's concern about the traffic disturbance in the area of the South Milledge Avenue Site Alternative during the construction period. A discussion of the construction period impacts is located in Section 3.11.3.1 of the NBAF EIS. All planned improvements are per the recommendations of the Department of Transportation and the Public Works Department.

Comment No: 8 Issue Code: 18.2

DHS shares the commentor's concern for the potential air quality impacts that could result from the incineration of experimental animals. There are no plans for incineration of human body parts.

As discussed in Section 3.13.1.2 of the NBAF EIS, incineration is only one of the technologies being considered for carcass and pathological waste disposal. Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As discussed in this section, the final design for the NBAF will probably include more than one technology for the treatment of carcass and pathological wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4. of the EIS (Air Quality) assumes that incineration, the treatment technology with the greatest potential to negatively impact air quality, will be used to assess the maximum adverse effect.

Any medical/infectious waste incinerator built in Georgia would have to be built and operated in accordance with federal, state and local regulations as well as permit requirements. These regulations and permit requirements would specify emissions limits, monitoring, and reporting requirements. The public would have an opportunity to review and comment on proposed emissions limits, and monitoring requirements as part of the permitting process.

Comment No: 9 Issue Code: 9.2

DHS notes the commentor's concern for air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3.

Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Air emissions were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards. If incineration were used, smoke stacks would be visible above the building roof line.

Comment No: 10 Issue Code: 10.2

DHS notes the commentor's concern regarding potential noise affects. As described in Section 3.5.3.3 of the NBAF EIS, most audible operational noises would emanate from traffic and the facility's heating, cooling, and filtration systems.

Comment No: 11 Issue Code: 12.2

DHS notes the commentor's drought concerns. As described in Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. Section 3.7.3.1.1 describes the potential potable water sources, the Middle and North Oconee Rivers and the Jackson County Bear Creek Reservoir.

Comment No: 12 Issue Code: 21.2

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, 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: 13

Issue Code: 2.0

DHS notes the commentor's statement. Chapter 1 of the NBAF EIS describes the purpose and need for DHS's proposed action to site, construct, and operate the NBAF. The Food, Conservation and Energy Act of 2008 (Farm Bill), which was approved by both houses of Congress in May 2008, includes a provision directing the Secretary of Agriculture to issue a permit to the Secretary of Homeland Security for FMD live virus research at the Plum Island replacement facility (i.e., NBAF).

Mann, Laura

Page 1 of 1

PD0194

August 22, 2008

1|24.4

I support NBAF in Kansas.

Laura Mann

Comment No: 1

Issue Code: 24.4

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

Mann, William

Page 1 of 2

WD0236

From: info@athensfaq.org on behalf of [REDACTED]
Sent: Monday, August 11, 2008 4:46 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

1|25.2 | I am opposed to the selection of the Athens, Georgia site for the proposed NBAF. I do not claim that the facility in not needed – just not on that site in our community.

No one from outside of the community can fully appreciate the impact that the facility would have on the tranquility of the South Milledge Avenue site. In its pastoral condition, the University of Georgia Equestrian complex of agricultural buildings and pastures is a much-needed “image” for the “front door” of the university for all motorists arriving in Athens from the southern part of the state. All other entry roads into Athens and the university are crammed with intense retail development. Only the South Milledge Avenue corridor provides a peaceful transition into the community – one free of multi-lane traffic, countless interruptions of the flow of traffic, glaring signs, acres of asphalt parking, and commercial bombardment.

The DHS DEIS pays pitiful attention to the intrusion into the community of the proposed NBAF. Buried within all of its inflated projections of need, jobs and dollars, the DHS DEIS ignores the real extent of the many cultural and visual impacts that its presence on the border of Clarke and Oconee Counties would trigger.

The DEIS barely addresses “Visual Effects,” noting: “...visual effects would occur during construction activities but would be temporary. Long-term visual effects due to operation of the NBAF would occur...at the South Milledge Avenue Site...where the NBAF would be visible to nearby residential or recreational receptors [sic, people].” This is very true, and the DEIS “Comparison of Environmental Effects” should have rated the “effects” at the South Milledge Avenue site “SIGNIFICANT -- An action that would greatly degrade current conditions.”

2|6.2 | In 1999, after an exhaustive analysis and considerable enlightened thinking, the Athens-Clarke County government adopted its Comprehensive [Land Use] Plan. After months of Visual Preference Surveys conducted on a large segment of the population, the Plan included a “rural designation” that was designed to protect the agrarian and largely undeveloped portions of Clarke County. The methodology used to assess visual resources and impacts conformed to the Visual Management System (VMS) developed by the U.S. Forest Service. Topography, vegetation, and developed land uses were considered in the assessment, along with the visibility of changes from sensitive viewpoints.

Visual quality is described as “the visual patterns created by the combination of rural character landscapes and man-made features.” The three criteria for evaluating visual quality are: vividness; integrity; and unity. Vividness is the visual power or “memorability” of landscape components as they combine in distinctive visual patterns. Integrity is the visual collection of the natural and man-made landscape and its freedom from encroaching elements. Visual unity is the degree of visual coherence and compositional harmony of the landscape considered as a whole.

2 cont. | Among several other “Guiding Objectives,” The Comprehensive Plan for Athens-Clarke declares: “We will protect environmentally-sensitive corridors and utilize appropriate spaces to create a community-wide system of greenways and open spaces.” The proposed NBAF, if built, violates the spirit of the 1999 Comprehensive Plan. The local elected officials should abide by the Plan and oppose the NBAF in our county.
6.2

3|14.2 | The DEIS gives minimal weight to “Cultural Resources,” declaring: “...effects to cultural resources are not likely to occur with construction or operation of the NBAF at any site. Consultation with state and federally recognized Native American Indian tribes has been initiated.” Why are not 19th-, 20th, and 21st-century “cultural resources” as important as “Native American” resources? Are not American environmental icons, such as New York’s Central Park, the Blue Ridge Parkway, the Mall in Washington, DC, and even the verdant quality of the University of Georgia’s North Campus all “cultural resources” worth protecting and preserving? They are all man-made

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: 6.2

DHS notes the commentor’s statement. The South Milledge Avenue Site is currently zoned as “Governmental”, and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as “rural”, so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Chapter 3, Section 3.2.3. DHS and USDA would ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and policies.

Comment No: 3 Issue Code: 14.2

DHS notes the commentor’s concerns. A cultural resource assessment was conducted and submitted to the Historic Preservation Division of the Georgia Department of Natural Resources, who concurred that no cultural or archaeological resources would be affected (Section 3.9.3 of the NBAF DEIS). Coordination letters are included in Appendix G.

Mann, William

Page 2 of 2

WD0236

landscapes that no one would dare desecrate.

2 cont. | The same can be said for our rapidly-diminishing agricultural landscapes in close proximity to our communities.
6.2 | The pastoral visual character of the South Milledge Avenue site is the only rural scenery of that extent still remaining in the county. It is cherished by a large number of Athenians -- and Oconee County citizens -- and should be protected for future generations to enjoy.

An individual does not have to SEE a rural landscape to appreciate it. "Memorability" -- just knowing that it is there (adjacent to, or within the area to be seen when one passes by it on the road) provides a sense of well-being and satisfaction in knowing that one's environs are intact and not degraded by an intrusive new land use that permanently transforms the environment near one's home or travel route. We do not have to SEE our North Campus to "know" that it is there, a place of very special landscape character that is sacrosanct in the minds of most Georgians. Whether or not they ever step foot upon it, our citizens are content in knowing that it is there and being protected for future generations. The same is true for the bucolic UGA equestrian pastures.

1 cont. | Please do not select the South Milledge Avenue site in Athens, Georgia as the locale for the NBAF.

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

Sincerely,
W. Mann

Mann, William

Page 1 of 2

WD0434

From: info@athensfaq.org on behalf of William A. Mann [REDACTED]
Sent: Thursday, August 21, 2008 9:49 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1 | 25.2 | I am opposed to the proposed NBAF site on South Milledge Avenue in Athens, Georgia that the University of Georgia has gifted to the federal government. I believe that the 66-acre parcel in the middle of the UGA Varsity Equestrian Team's horse pastures may be geologically unsuitable for the project. The University of Georgia and DHS have yet to conduct the in-depth site analysis of the land to determine how buildable -- or costly the excavations on the site may be.
- 2 | 11.2 | The proposed structure is to measure 520,000 square feet -- perhaps all on one level. That will comprise an area of 12 acres of impervious site. Add to that the 350 parking spaces proposed for the staff and there will be an additional 4 acres of pavement. If the roads and truck-loading paved areas are added in, an additional 2 acres may be added. DHS claims researchers will conduct studies on "large animals" -- cattle, hogs, sheep and goats -- all of which may have to be temporarily corralled outside before being brought into the labs for disease research. They may need 15 acres of stock pens for these critters. Therefore, approximately 33 acres (half) of the 66-acre site might be impervious (or semi-pervious).
- 3 | 12.2 | The DHS, in all of its documentation of this proposal, has never mentioned on-site storm water management on the project. As can be seen on any map, the Middle Oconee River sits only about 250 feet from the southwestern-most project boundary. The river at that point is approximately 520' feet in elevation, or about 160 feet below the high point (680 feet) on the site.
- 4 | 7.2 | In defense of their proposed structure's colossal visual blight on a beautiful pastoral site, the Department of Homeland Security hastily stated at the scoping meeting in Athens in September 2007 that "perhaps two stories would be underground." That could be 25 to 30 feet deep. The USDA Soils Map of Clarke County shows that much of the proposed site is comprised of "Pacolet Sandy Clay Loam...to a depth of only 39 inches...[where bedrock is encountered]" Not only would the building require blasting of bedrock (gneiss), many other subsurface infrastructures may likewise have to be excavated through bedrock. This includes water lines, sewer pipes and all other underground utilities. If that is the case, severe construction costs and delays will arise -- prolonging the construction and disruption of traffic along South Milledge. Storm water detention basins may also have to be placed where bedrock is encountered -- more blasting, costs and delays.
- 2 cont. |
11.2 |
- 5 | 18.2 | Effluent from the NBAF will have to be pumped uphill (upstream) to the nearest sewage treatment plant. This is at a distance of approximately one mile. This hardly qualifies as "having all of the infrastructures in place," as the University officials stated at the scoping meetings. The blasting of bedrock will cause considerable and substantial disturbance to the nearby residential neighborhoods -- perhaps felt in Oconee County's subdivision, Hickory Hills and Brittain Estates, and maybe even Athens Academy (just across the Middle Oconee River).
- 6 | 8.2 |
- The two Athens Super WalMarts are each 205,000 square feet in area. They each have a detention basin/infiltration basin, each of which appear (on Google Earth) to be about one third to one half of the area of each (205,000 SF) store, or 75,000 to 100,000 SF (2 to 2.5 acres per detention basin).
- 7 | 6.2 | Therefore, if the 66-acre NBAF site is made half impervious (33 acres), then it may require detention basin/pond area(s) of as much as another 33 acres. That could cause the disturbance of nearly all of the 66-acre site. That would also leave no "wobble-room" for the placement of such ponds on a site, much of which has 10 to 15 percent slopes. Once the site-specific site design is done, might not the University of Georgia be compelled to GIVE the DHS more land to accommodate all of the site features?

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: 11.2

DHS notes the commentor's concern regarding construction at the South Milledge Avenue Site. As described in Sections 3.6.3.2, 3.1.1, and 3.14 of the NBAF EIS, excavation volumes, depth to bedrock, depth to the water table, and building codes are measures of a site's constructability.

Comment No: 3 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 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: 4 Issue Code: 7.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area.

Comment No: 5 Issue Code: 18.2

DHS notes the commentor's statement. The South Milledge Avenue Site will require approximately 5,286 feet of new sewer line along South Milledge Avenue to connect to the wastewater treatment plant.

Comment No: 6 Issue Code: 8.2

DHS notes the commentor's statement. The South Miledge Avenue Site Alternative will require approximately 5,286 feet of new sewer line along South Miledge Avenue to connect to the wastewater treatment plant.

Comment No: 7 Issue Code: 6.2

DHS notes the commentor's statement. The request for Expressions of Interest published by DHS specified a minimum size of 30 acres would be required for the NBAF. The Site Characterization Study and Figure 2.3.2-2 of the NBAF EIS provides a conceptual site design for the South Milledge Avenue Site within the 66-acre site. Section 3.3.2 includes a discussion of stormwater infrastructure, potential effects from stormwater runoff, and potential mitigation.

Mann, William

Page 2 of 2

WD0434

8 | 2.0

And, what if the NBAF turns out to be just the "first phase" of the DHS plans for the site? If the federal government wants to enlarge its scope of research, why would they build elsewhere? In all probability, once the federal government establishes a facility in Clarke County, there is every expectation that at some time in the future it will be expanded and more land will be required.

Sincerely,
William A. Mann

Comment No: 8 Issue Code: 2.0

DHS notes the commentor's concern. There are no plans to expand NBAF and acquire additional lands in the future. A new NEPA process would be required for the acquisition of additional lands beyond those addressed in this current NBAF EIS.

Mann, William

Page 1 of 2

WD0336

From: info@athensfaq.org on behalf of William A. Mann [REDACTED]
Sent: Monday, August 18, 2008 6:25 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

James V. Johnson
 Program Manager
 Department of Homeland Security

18-August, 2008

Dear Mr. Johnson,

- 1|25.2 | I am a retired professor of the University of Georgia after 36 years of loyal service to the institution. I have lived in [REDACTED] within 600 yards of the site for 24 years -- and I oppose the selection of the Athens site for the proposed NBAF. I do not claim that the facility is not needed -- just not on that site in our community.
- 2|7.2 | No one from outside of the community can fully appreciate the impact that the facility would have on the tranquility of the South Milledge Avenue site. In its pastoral condition, the University of Georgia Equestrian complex of agricultural buildings and pastures is a much-needed "image" for the "front door" of the university for all motorists arriving in Athens from the southern part of the state. All other entry roads into Athens and the university are crammed with intense retail development. Only the South Milledge Avenue corridor provides a peaceful transition into the community -- one free of multi-lane traffic, countless interruptions of the flow of traffic, glaring signs, blinding flood lighting, acres of asphalt parking, and commercial infrastructure.
- The DHS DEIS pays pitiful attention to the intrusion into the community of the proposed NBAF. Buried within all of its inflated projections of need, jobs and dollars, the DHS DEIS ignores the real extent of the many cultural and visual impacts that its presence on the border of Clarke and Oconee Counties would trigger.
- The DEIS barely addresses "Visual Effects," noting: "...visual effects would occur during construction activities but would be temporary. Long-term visual effects due to operation of the NBAF would occur...at the South Milledge Avenue Site...where the NBAF would be visible to nearby residential or recreational receptors [sic, people]." This is very true, and the DEIS "Comparison of Environmental Effects" should have rated the "effects" at the South Milledge Avenue site "SIGNIFICANT -- An action that would greatly degrade current conditions."
- 3|6.2 | In 1999, after an expensive and exhaustive analysis and considerable enlightened thinking (with assistance from the professional Clarke County Planning Department and the Fanning Institute of the University of Georgia), the Athens-Clarke County government adopted its Comprehensive [Land Use] Plan. After months of "Visual Preference Surveys" conducted on a large segment of the population (who volunteered their own time), the Plan included a "rural designation" that was designed to protect the agrarian and largely undeveloped portions of Clarke County. The methodology used to assess visual resources and impacts conformed to the Visual Management System (VMS) developed by the U.S. Forest Service (Landscape Aesthetics: Handbook for Scenery Management, 1995). Topography, vegetation, and developed land uses were considered in the assessment, along with the visibility of changes from sensitive viewpoints.
- 2 cont.
7.2 | The Comprehensive Plan describes "Visual Quality" as "the visual patterns created by the combination of rural character landscapes and man-made features." The three criteria for evaluating visual quality are: vividness; integrity; and unity. Vividness is the visual power or "memorability" of landscape components as they combine in distinctive visual patterns. Integrity is the visual collection of the natural and man-made landscape and its freedom

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 7.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area. The methodology used to assess visual resources and impacts generally conforms to the Visual Management System (VMS) developed by the U.S. Forest Service.

Comment No: 3 Issue Code: 6.2

DHS notes the commentor's concern regarding development of the South Milledge Avenue Site which is described in Section 3.2.3. A change in land use and loss of open space would occur; however, current zoning regulations allow for this type of development. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Chapter 3, Section 3.2.3. DHS and USDA would ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and policies.

Mann, William

Page 2 of 2

WD0336

2 cont. | from encroaching elements. Visual unity is the degree of visual coherence and compositional harmony of the
7.2 | landscape considered as a whole.

3 cont. | Among several other "Guiding Objectives," The Comprehensive Plan for Athens-Clarke declares: "We will protect
6.2 | environmentally-sensitive corridors and utilize appropriate spaces to create a community-wide system of greenways
and open spaces." The plan further states: "Our gateways and corridors will have design standards that add visual
value thus creating a "sense of place" to our community."

In the 2006 update of the Comprehensive Plan, the section titled "Community Assessment" -- Quality Community
Objectives, states about Sense of Place: "If applicable, our community has a plan to protect designated farmland.
There are only 9,500 acres of farmland in Clarke County -- 12% of total land base. There is very little commercial
farming to protect; the majority of farmland remains so because of aesthetic considerations." Under the heading,
Open Space Preservation, it states: "...open space should be set aside from development for use as public parks or as
greenbelts/wildlife corridors."

The proposed NBAF, if built, violates the spirit of the 1999 Comprehensive Plan. The local elected officials should
abide by the Plan -- which they funded and approved -- and oppose the NBAF in our county.

The DEIS also gives minimal weight to "Cultural Resources," declaring: "...effects to cultural resources are not
likely to occur with construction or operation of the NBAF at any site. Consultation with state and federally
recognized Native American Indian tribes has been initiated." Why are not 19th-, 20th, and 21st-century "cultural
resources" as important as "Native American" resources? Are not American environmental icons, such as New
York's Central Park, the Blue Ridge Parkway, the Mall in Washington, DC, and even the verdant quality of the
University of Georgia's North Campus all "cultural resources" worth protecting and preserving? They are all man-
made landscapes that no one would dare desecrate.

2 cont. | The same can be said for our rapidly-diminishing agricultural landscapes in close proximity to our communities.
7.2 | The pastoral visual character of the South Milledge Avenue site is the only rural scenery of that extent still
remaining in the county. It is cherished by a large number of Athenians -- and Oconee County citizens -- and should
be protected for future generations to enjoy.

An individual does not have to SEE a rural landscape to appreciate it. "Memorability" -- just knowing that it is there
(adjacent to, or within the area to be seen when one passes by it on the road) provides a sense of well-being and
satisfaction in knowing that one's environs are intact and not degraded by an intrusive new land use that
permanently transforms the environment near one's home or travel route. We do not have to SEE our North
Campus to "know" that it is there, a place of very special landscape character that is sacrosanct in the minds of most
Georgians. Whether or not they ever step foot upon it, our citizens are content in knowing that it is there and being
protected for future generations. The same is true for the bucolic UGA equestrian pastures.

1 cont. | Please do not select the South Milledge Avenue site in Athens, Georgia as the locale for the NBAF.
25.2

Respectfully Submitted,

William A. Mann
Professor Emeritus
The University of Georgia



Manney, Thomas

Page 1 of 2

WD0873

From: Thomas Manney [REDACTED]
Sent: Monday, August 25, 2008 11:36 PM
To: NBAFProgramManager
Subject: Comments on the NBAF Draft Environmental Impact Statement

August 25, 2008

U.S. Dept. of Homeland Security
 Science and Technology Directorate
 James V. Johnson

1) 25.4 I have grave reservations about the wisdom of locating the NBAF facility on the U. S. Mainland
 2) 21.4 in general, and in proposed Kansas location in general. In brief, I do not believe the Draft EIS
 has made an adequate investigation of, or a convincing case for the safety of this facility.
 Further, I feel that the advantages – economic and academic – have been exaggerated in relation
 to the magnitude of the risks and the uncertainties. The Kansas Bioscience Authority, Kansas
 Bioscience Authority, and Kansas State University have pursued a heavy-handed, high-pressure
 3) 15.4 campaign to promote the selection of Kansas for this project. While they have given lip-service
 to academic and service motives, the most apparent concern is clearly for the economic
 4) 19.4 development potential, especially the commercialization opportunities. Unfortunately, in this
 promotional blitz, the interests of community safety have been seriously down-played.

They have made a great effort to create the illusion that there is no significant public opposition
 to having the NBAF located here, but that illusion has been dispelled. In response to a heavy-
 handed management to suppress dissent in the public meetings there has been a spontaneous
 emergence of opposition at the grass roots level, especially among farmers and ranchers. This
 has stimulated a flurry of individual expressions of distrust and skepticism in letters to the
 editor, internet blogs, and public discussions.

5) 4.4 The response of the Heartland BioAgro Consortium has been an intense campaign to discredit
 those who raise questions. They have purchased full-page newspaper advertisements under the
 title "Kansas: Protecting America's Dinner Table". But their message is that opponents have
 presented fallacies and labeled them facts. Unfortunately for their argument, most of
 the "fallacies" have been drawn from the analysis from the GAO and the DEIS itself.

The local opposition has based its arguments largely on the GAO report of May 22nd. Much of
 this commentary and analysis has been disseminated through a blog site
<http://nonbaf.wordpress.com>. This came about in response to the DHS public information
 meetings, which discourage questions from the public. Only comments were allowed and these
 after intense "expert" testimony by representatives of the University, the Consortium, and the
 sponsoring government agencies.

The approach, best illustrated in these meetings, has been to intimidate those who question or

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

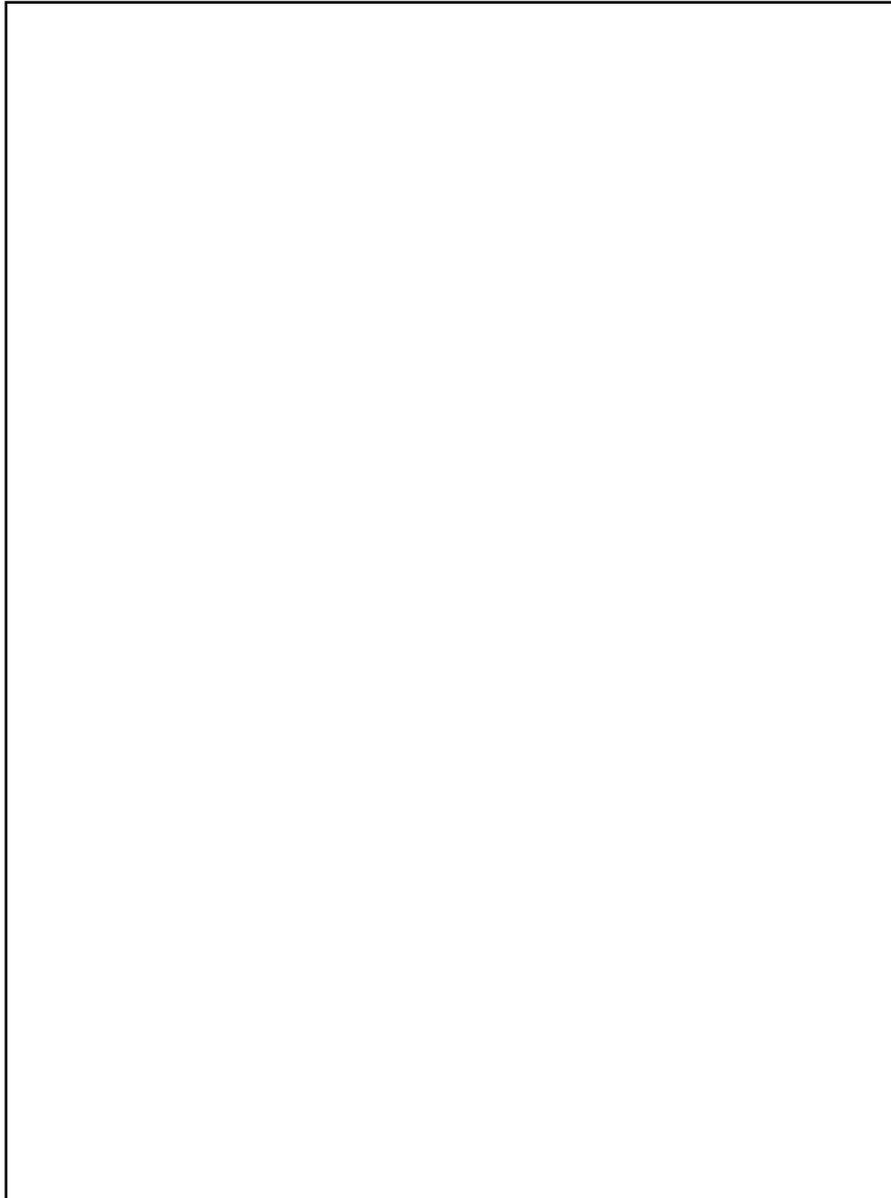
Accidents could occur in the form of procedural violations (operational accidents), natural phenomena
 accidents, external events, and intentional acts. Although some "accidents" are more likely to occur
 than others (e.g., safety protocol not being followed), the chances of an accidental release are low.
 The specific objective of the hazard identification, accident analysis, and risk assessment is to identify
 the likelihood and consequences from accidents or intentional subversive acts. In addition to
 identifying the potential for or likelihood of the scenarios leading to adverse consequences, this
 analysis provides support for the identification of specific engineering and administrative controls to
 either prevent a pathogen release or mitigate the consequences of such a release. The risk of an
 accidental release of a pathogen is extremely low. The risk of an accidental release of a pathogen is
 extremely low, but the economic effect would be significant for all sites. As described in Section
 3.10.9 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 in the range of \$2.8 billion in the Plum Island region
 to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is
 mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of
 Rift Valley fever virus on the national economy has not been as extensively studied, the potential
 economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease
 outbreak, while the additional cost due to its effect on the human population could be as high as \$50
 billion. There is little economic data regarding the accidental or deliberate Nipah virus release.
 However, cost would be expected to be much lower than a release of foot and mouth disease virus
 or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

Comment No: 3 Issue Code: 15.4

DHS notes the commentor's opinion. The economic impacts resulting from the construction and the
 normal operations of the proposed NBAF at the Manhattan Campus Site Alternative are discussed in
 Section 3.10.4 of the NBAF DEIS. This discussion includes estimates of the facilities impacts on local
 employment, as well as State and local tax revenues. The potential economic effects arising from an
 accidental release are discussed in Section 3.10.9 and Appendix D of the NBAF DEIS. The primary
 economic effect of an accidental release would be the potential banning of U.S. livestock products
 regardless of the location of the accidental release.

Comment No: 4 Issue Code: 19.4

DHS notes the commentor's concern regarding the NBAF. The purpose and need for the proposed
 action is discussed in Chapter 1 of the NBAF EIS. DHS can not guarantee that the NBAF would
 never experience an accident. However, as discussed in Section 2.2.1.1, modern biosafety design
 substantially diminishes the chances of a release as the primary design goal is to provide an
 adequate level of redundant safety and biocontainment that would be integrated into every



component of the building. A discussion of human health and safety is included in Section 3.14.

Comment No: 5 Issue Code: 4.4

The NBAF would assist in ensuring a safe, affordable food supply. The NBAF would allow a fully coordinated approach to research, diagnostics, vaccine and antiviral development, and responses to outbreaks in agricultural animals including cattle, swine, and sheep at a U.S. facility. The purpose and need for the proposed action is discussed in Chapter 1 of the NBAF EIS.

Manney, Thomas

Page 2 of 2

WD0873

outright oppose the plans. The meetings were held in a hostile environment in the Student Union Building while few students were on campus. Because of construction there is extremely limited nearby parking – especially handicapped accessible parking. To attend, most people had to park at the outlying football stadium and ride a shuttle bus.

cont. | 5 | 4.4 | Further implicit intimidation has come from the KSU administration. Since all proposals for research on infectious agents or recombinant DNA organisms must have approval from administrative officials, the scientists who have most knowledge for independent evaluation of the risks are dissuaded from dissenting or questioning. The administrative officers who must sign off on research funding proposals and the very ones who are working to compete for NBAF site.

However, I have been active in public discussion among many residents who question the wisdom of this location. These include small business people, farmers, ranchers, students, physicians and academics. These people express very serious opposition to the project and to the way it has been promoted. Most of their concern has centered on the prospect of studying FMD close to a major livestock center.

I have chosen to focus my comments on these aspects of the process, not because I lack the knowledge and ability to sort through the DEIS, but because of the assumption by the proponents that they can take the support of the public for granted.

There is serious, sincere, informed grass-roots opposition to putting this facility in this location, and it will still be here after the public comment period has ended.

Thomas R. Manney
Professor Emeritus
Physics and Biology,
Kansas State University

Mansfield, Wayne

Page 1 of 1

WD0607

From: Wayne Mansfield [REDACTED]
Sent: Saturday, August 23, 2008 5:01 PM
To: NBAFProgramManager
Subject: Mississippi NBAF Site

1|24.5;
2|8.5

Good evening. It is truly my honor to present comments regarding the potential of the location of the NBAF in Mississippi. Serving as director for the Vicksburg Warren Economic Development Foundation, I am aware of the enormous potential this project has for our future. Without a doubt Mississippi is more than well suited to have this facility due to its outstanding labor force and second to none research facilities. On behalf of the VWEDF, I strongly urge the location of this facility in our great state.

With regards,

Wayne Mansfield
Director,
Vicksburg Warren Economic Development Foundation

Comment No: 1 Issue Code: 24.5

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

Comment No: 2 Issue Code: 8.5

DHS notes the commentator's statement.