

McDermet Family, McDermet Family

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WD0097

From: Nancy Rock-McDermet [REDACTED]
Sent: Thursday, July 24, 2008 2:53 PM
To: NBAFProgramManager
Subject: Opposed to BSL-4 Facility Construction at Plum Island

To Whom This May Concern:

- 1) 25.1 Our family is opposed to the construction of a BSL-4 facility on Plum Island. There are many unanswered questions with regard to exposure to humans in the Orient Point area and further into Southold township. What is the human loss calculated to be in the Orient Point area (and further into Southold Township) should an accident occur with an airborne pathogen fatal to humans? What would the symptoms of such a death entail? What is the cost of human life, and any statistically determined human death toll expected to be should it be the result of such an accident? Plum Island is referred to as a remote location...1.5 miles off Orient Point doesn't seem to fit the description of remote. There are other reasons to oppose the construction of this facility on Plum Island as well; poor air quality that can't be quantified for the citizens, increased traffic and congestion on existing challenged roadways, to name a few. Our family lives within 1 mile from Orient Point, and we are vehemently opposed to a BSL-4 facility being constructed on Plum Island.
- 2) 19.1
- 3) 9.1
4) 17.1
- The McDermet Family

Comment No: 1 Issue Code: 25.1

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

Comment No: 2 Issue Code: 19.1

DHS notes the commentor's concern. A discussion of human health and safety is included in Section 3.14 of the NBAF EIS.

Comment No: 3 Issue Code: 9.1

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. Site-specific effects at the Plum Island Site are discussed in Section 3.4.6. Air pollutant concentrations 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.

Comment No: 4 Issue Code: 17.1

DHS notes the commentor's concerns regarding impact to traffic and transportation infrastructure from the NBAF construction and operation at the Plum Island Site Alternative. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Plum Island Site is provided in Section 3.11.6 of the NBAF EIS.

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U.S. Department of Homeland Security,
Science and Technology Directorate
Mr. James V. Johnson
M.S. #2100
245 Murray Lane SW
Bldg. 410
Washington, D.C. 20528

August 21, 2008

Dear Mr. Johnson,

1| 25.1 On behalf of our entire family, extended family, business associates and friends who spend time with us at our primary residence/home in Orient Point, N.Y., we want to share with you our TOTAL OPPOSITION to the proposed plans for expansion/upgrade to the Plum Island Animal Disease Center to a BSL-4 facility.

2| 19.1 It seems as if more questions are raised constantly about issues such
3| 21.1 as human safety, accidents, evacuation, terrorists, transportation of
4| 17.1 viruses, air quality, past and present environmental impact to
5| 9.1 surrounding wetlands and shoreline, lack of the level of security one
6| 12.1 should expect at the Plum Island facility entrance in Orient Point and around the shoreline perimeter and air space for Plum Island itself than have been answered.

cont.| 3| 21.2 Under the circumstances where a possible accident could occur at any given time for a variety of reasons, one wonders would the citizens, residents and visitors to Orient Point, Orient and the surrounding communities to Plum Island heading West on the N. Fork become part of some giant experiment with "no controls" and "no prior consent for participation" in the "study" of the aftermath of an accidental release of toxic virus (with no vaccine or cure) in the environment to human and animal life in an area with dense human population, inadequate evacuation procedures and no warning.

Living in an area and walking the land gives one a perspective that visitors and nonresidents do not have. Within the last year on more

Comment No: 1 Issue Code: 25.1

DHS notes the commentor's opposition to the Plum Island Site Alternative. 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 primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. The decision on whether to build the NBAF will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

The Department of Homeland Security Under Secretary for Science and Technology Jay M. Cohen, with other Department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the Final NBAF EIS is published.

Comment No: 2 Issue Code: 19.1

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Chapter 3, 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 Chapter 2, 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 Chapter 3, 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 Chapter 2, Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the Animal Research Policy and Institutional Animal Care and Use Committee (APHIS). 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: 3 Issue Code: 21.1

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.

DHS notes the commentor's opposition to the five mainland site alternatives. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF.

DHS notes the commentor's concern. A site-specific emergency response plan would be developed

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

Comment No: 4 Issue Code: 17.1

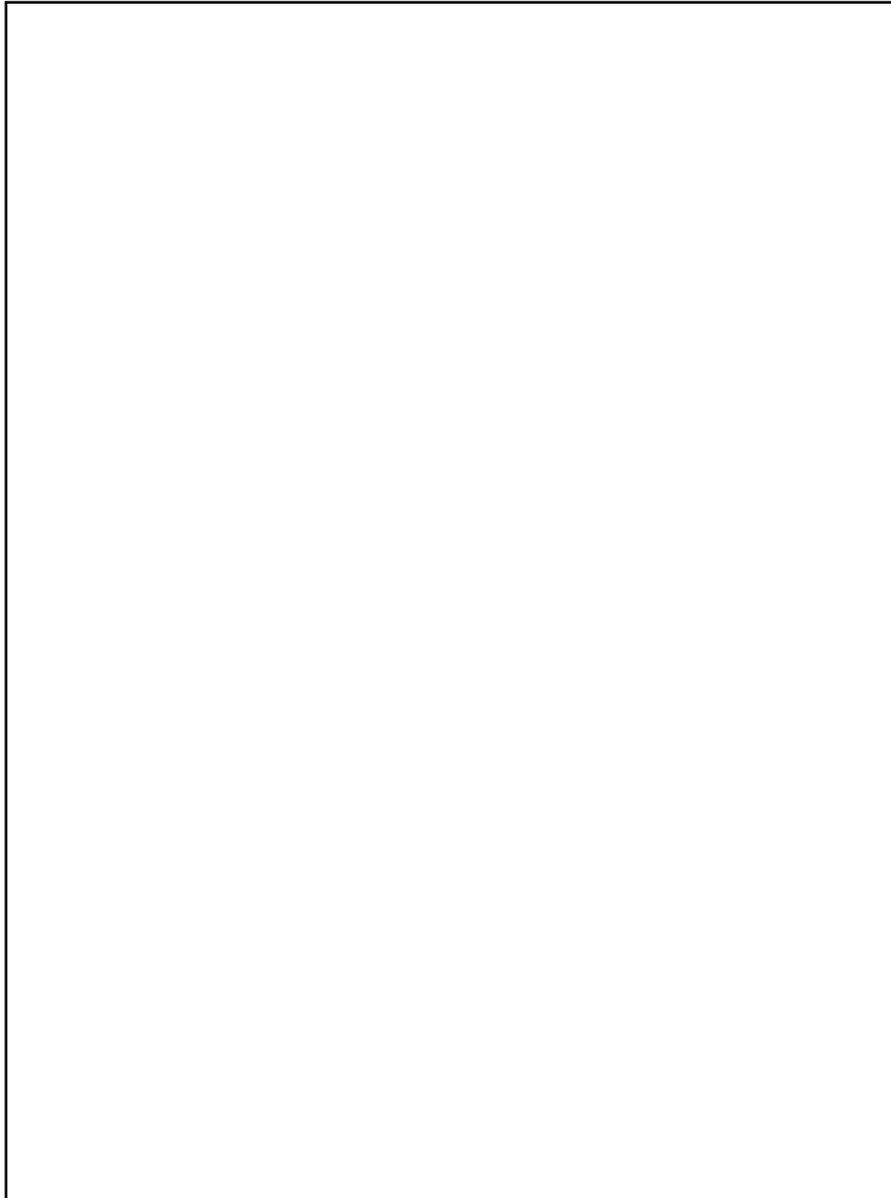
DHS notes the commentor's concerns regarding the handling and transport of packages containing pathogens. The general regulations governing the required NBAF handling and transport of packages containing pathogens, and a discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. Section 2.2.2.3 of the NBAF EIS provides detailed information on the handling and transport of packages containing pathogens. Additionally, an analysis of accidental releases during transportation is provided in Section 3.14, Health and Safety and Appendix E of the NBAF EIS. Information regarding the existing road conditions and potential effects to traffic and transportation from the Plum Island site is provided in Section 3.11.6 of the NBAF EIS. An emergency response plan that would include area evacuation plans would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations. With regard to the shipment of pathogens, no specific transportation corridors have been evaluated. Should a decision be made to build NBAF and a site selected, transportation routes would be identified in accordance with a standard shipment procedure with the route optimized for safety and security.

Comment No: 5 Issue Code: 9.1

DHS notes the commentor air quality concerns. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS. Section 3.4.1 describes the methodology used in assessing potential air quality consequences at each site. Conservative assumptions were used to ensure the probable maximum effects were evaluated. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards. Should a decision be made to build NBAF and following site selection and final design, a complete emission inventory would be developed and refined modeling performed as necessary in accordance with state-specific air quality permitting requirements. DHS would be required to comply with permit-established emission requirements.

Comment No: 6 Issue Code: 12.1

DHS notes the commentor's concern regarding wastewater treatment and potential adverse effects on fisheries in the vicinity of the Plum Island Site. The NBAF EIS Section 3.3.2.1.4 describes PIADC's tertiary wastewater treatment facility and current capacity of 60,000 gallons per day. EIS Section 3.13.1 describes methodologies used to assess NBAF's solid and liquid waste management options. EIS Section 3.3.6.3.4 describes the wastewater treatment needs of the proposed NBAF as 50,000 to 125,000 gallons per day, which would exceed current capacity during peak periods. EIS



Section 3.3.6.3.4 also describes options for meeting the wastewater treatment needs of the proposed NBAF on Plum Island. EIS Section 3.7.2.1.1 describes the current TMDL for nitrogen loading in Long Island Sound. The proposed NBAF would include a new wastewater treatment facility that would meet capacity requirements and provide for compliance with TDMLs. Furthermore, Section 3.15 of the NBAF EIS describes mitigation measures to prevent aquatic resource impacts associated with erosion and sedimentation during the construction process and stormwater runoff from the completed facility. Mitigation would include best management practices, a stormwater pollution prevention control plan, and low impact development (LID) design techniques. The inclusion of a modern wastewater treatment facility, combined with other mitigation measures described above, would prevent significant adverse impacts on fisheries and other aquatic organisms.

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than one occasion, cars headed for the Cross Sound Ferry could be seen entering the open fence gate adjacent to the guard house at the east end of the Plum Island parking lot on Main Rd. in the middle of the day. They pulled up to the guard house in confusion thinking they were entering the area to line up in order to board the Cross Sound Ferry, and were then directed to back up onto Main Rd., exit the Plum Island gate area they entered in error, and head a few ft. to the east for the ferry entrance. As well, walk on passengers for the ferry constantly park at the perimeter of the Plum Island fenced area (within a few ft. of the guard house if they are pulled up on the grass). Logically, this seems like a security issue both for Plum Island's present use as a BSL-3 site, and most certainly for a proposed future site of a BSL-4 facility.

7| 2.0

Attending the public hearings in the Town of Southold seemed to raise more questions than they answered, and many times answers to serious questions were inadequate if there was any answered at all. It becomes a question of confidence and trust. Can one trust that the Director of the Plum Island facility and associated employees has the expertise and ability enough to inspire one to place the safety of their lives and those of their families in their hands in light of so many unanswered critical questions related to present and future operation processes and procedures? There is NO confidence or trust to do this.

8| 26.0

Having taken the time, ink and paper to print DEIS and read it, it appears that due diligence for the Plum Island facility was not apparent in the DEIS when compared the other sites. This does not inspire confidence either; is frightening and on a certain level insulting to the logic, sensibility, and intelligence of the residents of Long Island. It is extremely concerning that this type of incomplete "study" is acceptable on any level, especially for a facility that deals in Science and the science of experimentation. More would be expected of a Master's thesis candidate. It is also very concerning that it is a seemingly serious contender (even listed as an alternative site) in light of the results of the DEIS.

Comment No: 7 Issue Code: 2.0

DHS notes the commentor's lack of trust in the federal government.

Comment No: 8 Issue Code: 26.0

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

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cont.| 1| 25.1

There are many more reasons that expanding the present Plum Island Animal Disease Center is the worst choice possible. You have no doubt heard them all. However there is another issue that doesn't get a lot of attention; it is the unregulated/unsupervised flights of helicopters on the N. Fork of Long Island. There is a lack of control, oversight, and compliance to the altitudes and flight routes these helicopters take over the N. Fork where Plum Island is located. It seems they are off or below the "radar". Having witnessed repeated flights over our home (which is 1 mile from the tip of Orient Point) at low altitudes (not much above the tree canopy level) flying at high speeds, one has to wonder with regard to Plum Island...could any one of these rented helicopters fly over Plum Island at a low altitude and perhaps drop something or someone from the craft in a terror related activity? It gets one to thinking seriously about this unregulated or unsupervised airspace issue in an area that is proposed to be upgraded BSL-4 facility.

cont.| 3| 21.1

One wonders...will an accident occur while we are running, enjoying the beach, biking, kayaking, fishing, at work,...or will we be lucky enough to be shopping up island in Riverhead and remain "untouched" by an accident for the moment. Would our home, neighborhoods and the N. Fork be quarantined? For how long? What could the symptoms of an accidental exposure to a toxic virus with no antidote be? Would it be a long and painful death? Or short and painful? Or no pain at all? How would we be informed an accident has occurred? How long after the event? In what manner? Siren? What about people with hearing disabilities? What if panic ensues in such a densely populated area? Can we get out? By car? Should we get out? Can we bunker down in a secured house? How secure? For how long? How do you complete a "lock down" of the N. Fork of Long Island...roads...water...air?

There are so many unanswered critical questions that we should have the answers to, and do not, which make Plum Island an unacceptable choice for a proposed BSL-4 facility. There is a place on this planet for a facility of this type, but it appears to be glaringly apparent for a multitude of reasons that the Plum Island Animal Disease Center located 1 ½ miles off the tip of Long Island, New

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cont. | 3 | 21.1

York is not the proper venue to study viruses fatal to human beings with no vaccine or cure. Accidents do happen...that is a given.

cont. | 1 | 25.1

With our immediate family, extended family, friends and business associates that share our home in Orient Point with us, there are more than 100 additional voices to oppose Plum Island as a BSL-4 facility. Please consider and count their numbers as additional public opposition to a BSL-4 facility at Plum Island.

Thank you for taking the time to read this letter, and for your visits to the public meetings in Southold Town.

Sincerely,



The McDermet Family of [REDACTED]
our extended family, friends and
business associates that share our home.

McDonald, J. David

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WD0206

From: McDonald, David [David.McDonald@wichita.edu]
Sent: Wednesday, August 06, 2008 5:14 PM
To: nbafprogrammanager@dhs.gov
Subject: Letter of support for Kansas proposal for the site of the National Bio- and Agro-Defense Facility
Attachments: DHS comment letter from WSU.doc

For Mr. James Johnson, DHS Science and Technology Directorate:

1|24.4 | Please find attached a letter describing my support for choosing Kansas as the site for the National Bio- and Agro- Defense Facility.

Regards,

J. David McDonald
Associate Provost for Research & Graduate School Dean
Wichita State University
1845 Fairmount
Wichita, KS 67260-0007
USA
Phone 316-978-6980

Comment No: 1 Issue Code: 24.4

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

McDonald, J. David

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WD0206



WICHITA STATE UNIVERSITY

Office of Research Administration

August 6, 2008

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

Mr. Johnson:

I am writing to you to join my voice with others in support of locating the National Bio- and Agro-Defense Facility in Kansas.

I have followed this process very closely from its inception and I am convinced that, based on the merits, the state of Kansas has the strongest claim for hosting this important national facility. I state this so directly, because I have observed that this is a state that intimately understands the value of agriculture to our country's well-being and is highly committed to protecting it. Further, I know first-hand that Kansas State University is very well-positioned, both geographically and topically, to provide guidance, support, and expertise for this facility. Their College of Veterinary Medicine is world class and the university's support for agriculture is deep, wide and of long standing. I have immense respect for them as an institution of higher learning and it is a respect that has been well-earned.

1 cont.
24.4

I think that it is also important to note that state support for this facility goes all the way to the top. Not only has the Governor been quite vocal in her support, but an impressive number of high-level state agencies and entities have worked diligently to put Kansas in a competitive position for this facility. This speaks very clearly for the support and priority that this facility can anticipate, if this state is chosen for the location.

In closing, I would note that no other site on the list has the combination of agricultural depth, existing animal health infrastructure and expertise, and direct affiliation with a Research 1 University. These three features, all well-developed in the Kansas proposal, represent a very powerful combination and one that I think quite clearly situates this state as the best site for this important national facility.

I would be most happy to address this issue in greater detail. Please feel free to contact me.

Regards,

J. David McDonald
Associate Provost for Research

Wichita State University, Wichita, Kansas 67260-0007 Telephone: (316) 978-3285 Fax: (316) 978-3750

McDonald, CPA, Bryan

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MD0115

Bryan McDonald, CPA



August 20, 2008

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

Re: Location of NBAF facility

Mr Johnson,

1| 24.5

I live in Madison County, Mississippi and would like to express my support for the location of the NBAF facility in Flora.

2| 1.0

I have read a good deal about it and I believe the facility would serve to increase the quality of life of the folks that live here. It would also provide jobs and help protect our nation from bioterrorism.

Thanks for taking the time to consider Madison County.

Sincerely,

Bryan McDonald

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: 1.0

DHS notes the commentor's support for the Flora Industrial Park Site Alternative. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

McDonald, CPA, Bryan

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MD0115

OR FAXED TO DHS TO THE FOLLOWING NUMBER: 1-866-508-NBAF
(6223) ⁶²²³
OR COMMENT VERBALLY BY CALLING A 24-HOUR TOLL FREE NUMBER:
1-866-501-NBAF (6223)

McElhaney, Mabel

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WD0162

From: Mabel [REDACTED]
Sent: Saturday, August 02, 2008 5:29 PM
To: NBAFProgramManager
Subject: Comment on NBAF

Ill health prevents me from attending hearings, so I hereby submit my opinion concerning the National Bio-/Agro-Defense Facility:

1| 25.0 | I oppose this proposal to site NBAF *anywhere*, but especially in my state of North Carolina. I would, however, reconsider such a proposal from a new US government which demonstrates more credibility than the present one.

Mabel McElhaney
[REDACTED] NC

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

McFatter, Miki**Page 1 of 1**

WD0557

From: info@athensfaq.org on behalf of Miki McFatter [REDACTED]
Sent: Sunday, August 24, 2008 7:12 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program manager,
I was born in Athens Georgia sixty two years ago. I consider Athens "home" even though our family has now moved to Alabama.

All the children in our family are graduates of the University. I constantly recommend the University of Georgia to others .

1| 25.2 | However, if this lab is built in Athens, I will no longer recommend the University. I will actually discourage anyone from attending there. The DEIS factually shows that Athens is not a safe location. All students attending the University would be in harms way. Surely no parent would consider the University of Georgia for their children in the future.

2| 5.0 | Please put the lab elsewhere where lives will not be at risk. Please find a safe location.
Your lab will not be welcomed in Athens, Georgia.
Sincerely, Miki McFatter

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's concern for security. Security concerns will be considered in the selection of the Preferred Alternative.

McGee, Melba

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FD0097



North Carolina Department of Environment and Natural Resources
 William G. Ross Jr., Secretary

Michael F. Easley, Governor

MEMORANDUM

TO: Valerie McMillan
State Clearinghouse

FROM: Melba McGee
Environmental Review Coordinator

RE: 08-0590 Draft Environmental Impact Statement, National Bio and Agro-Defense Facility, Butler in Granville County

DATE: August 21, 2008

The Department of Environment and Natural Resources has reviewed the DEIS to construct the National Bio and Agro-Defense Facility at the Umstead Research Farm Site in Butler. The proposed Butler site is located in the Upper Neuse River Watershed between the Lake Holt Reservoir and the Falls Lake system. The Upper Neuse River Basin drains to the Falls Lake Reservoir, the primary water source for Raleigh. Three major tributaries (Flat River, Little River and Eno River) and nine public drinking water supply reservoirs are located in the Upper Neuse River Watershed. This raises issues in relation to water quality protection, types of waste produced and disposal methods, stormwater runoff and potential adverse effects from secondary and cumulative impacts.

The department continues to be concerned with the risk and magnitude of impacts that could occur from an accidental release. Our concerns involve development in an area that consists of schools, youth centers and hospitals. Home Land Security has been limited in looking beyond the project footprint and the DEIS fails to fully consider long term impacts to the environment and human resources. Confidence is expressed that virus outbreaks can be avoided but documentation also states there is considerable opportunity for the virus to cause infections and become established in the environment beyond the facility boundary. The department is particularly interested in strategies that would prevent this from happening and how an emergency management plan would be implemented in case of a biological accident.

One North Carolina Naturally

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Comment No: 1 Issue Code: 26.0
 DHS notes the commentor's statement.

Comment No: 2 Issue Code: 12.3
 DHS notes the commentor's water quality protection, waste generation and disposal, and stormwater concerns. The NBAF EIS Section 3.7.1 describes the methodology used in assessing each alternative site's water resources. The NBAF EIS Section 3.7.7 specifically describes the Umstead Research Farm Site's affected environment and potential construction and operational consequences including potential stormwater permitting and planning requirements. The NBAF EIS Section 3.13 describes the NBAF's potential solid and liquid waste management options.

Comment No: 3 Issue Code: 18.3
 DHS notes the commentor's concern. Section 3.13.2.2 of the NBAF EIS presents information on the disposition of wastes that would be generated by the operation of the facility, and specifically for the Umstead Research Farm Site in Section 3.13.8.3.

Comment No: 4 Issue Code: 21.3
 DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Chapter 3, 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 Chapter 2, 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 Chapter 3, 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 Chapter 2, Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the Animal Research Policy and Institutional Animal Care and Use Committee (APHIS). Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density

of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated.

Comment No: 5 Issue Code: 15.3

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. 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.

McGee, Melba

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6/5.3 The DEIS is intended to help reviewers make decisions based on the data and analysis of natural resources, social and economic impacts. While NEPA recommends the Draft EIS identify the preferred alternative, it does allow the preferred alternative, as in this case, to be identified in the Final EIS. If the Butner site is selected as the preferred alternative a supplemental Draft EIS should be prepared in order to review and comment on information and studies currently excluded from the DEIS?

Thank you for the opportunity to respond.

Attachments

Comment No: 6 Issue Code: 5.3

DHS notes the commentor's statement. Several factors will affect the decision on whether or not the NBAF is built, and, if so, where. The EIS itself will not be the sole deciding factor. The decision will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable Federal, state, and local laws and regulatory requirements; 4) consultation requirements among the Federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment. The Department of Homeland Security Under Secretary for Science and Technology Jay M. Cohen, with other Department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

NCDR 11:14 P.07 Aug 25 2008 03/23 FAX:919-733-5571

McGraw, Bill

Page 1 of 1

WD0270

From: Bill McGraw [wfm@yazooinsurance.com]
Sent: Thursday, August 14, 2008 5:59 PM
To: NBAFProgramManager
Subject: BioLab in Flora, Mississippi - PUBLIC COMMENTS

RE: Public Comments - BioLab for Flora, Mississippi

To whom it may concern:

1|24.5 I have lived in Yazoo County for nearly all of my 48 years, and I know the people and the area surrounding Flora, MS very well. Yazoo City is approximately 26 miles northwest of Flora. While there have been opinions, and rumors, surrounding the viability or safety of this particular type plant, and/or the ability of the local area to support it - allow me to add the following:

- 1) Nowhere in this country can you find people who know more, or have been exposed to more animal and plant-borne pathogens, bacteria, mold, or the like, than the people of central Mississippi and the delta. We live with the reality, and the threat posed by these organisms, every day. As a matter of course, and of survival, our citizens remain constantly aware of these threats, and how to avoid and to minimize them. It is a way of life. Further, we believe and strongly feel that knowledge and pro-active studies of the type represented by this lab will be of benefit to the local area, and to our country at large. These are smart people. These are courageous people. These are good people. These are hard-working people. There is nothing they cannot accomplish, given the chance.
- 2) The only reason we do not have such a lab in our part of the country is that the national presentation and perception of Mississippi has been that we are ignorant, and stupid, and incapable of working in areas of science or technology. Statistical fact shows that our best and brightest, and in remarkable numbers, have had to go to other parts of the country to share their skills and intelligence, building industries along the way - computer science, chemical-biological-electrical and aerospace engineering to name a few. Just check the facts and you will find that many of the pioneers in these areas of science came from Mississippi.

Let me put in bluntly. There are those who wish to stick their heads in the sand, and fight the arrival of such a lab for one reason and one reason only - they either are not prepared, or they are not willing to prepare themselves for the challenging career opportunities that such an industry would present. In other words - "If it doesn't help ME, then I am opposed to it!" That fact is that it will help everyone; even those who can't see it for the sand in their eyes.

Finally, there are those who don't want it in Flora and Madison county, out of fear that it will be an outstanding, successful and a productive lab. Their "fears" would in fact be realized; and that would prove, yet again, that the rest of the country has been wrong about Mississippi all along. Build it, and WE will come!
 And we will do a great job for our country..

Sincerely,
 Bill McGraw, CIC
 Yazoo Insurance Agency, Inc.
 V. President
 P O Box 540
 Yazoo City, MS 39194
 662 746 2651

Comment No: 1

Issue Code: 24.5

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

McGuffie, Mike

Page 1 of 2

08/25/2008 18:18 [REDACTED] 001
FD0080

[REDACTED]

Fax

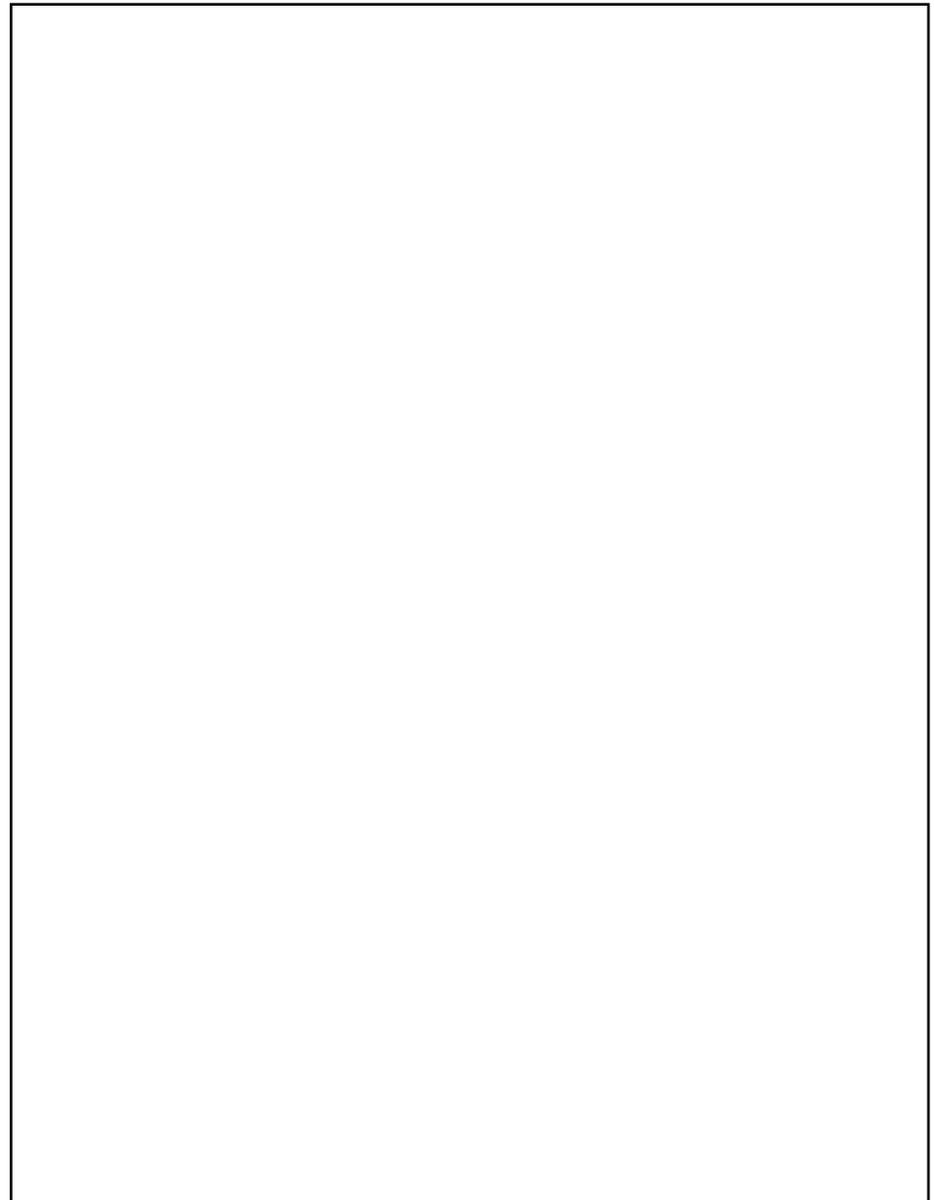
To: James V. Johnson From: Mike McGuffie
Fax: 1-866-508-0223 Pages: 2, including cover sheet
Phone: Date: 8/25/2008
Re: Support of the National Bio and Agro-Defense Facility CC: N/A

Urgent For Review Please Comment Please Reply Please Recycle

• Comments:

Thank You,


Mike McGuffie



McGuffie, Mike

Page 2 of 2

08/25/2008 16:18 [REDACTED]

002

FD0080

August 24, 2008

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

Dear Sir,

I am writing you in support of the National Bio and Agro-Defense Facility, to be possibly located in Flora, Mississippi.

1|24.5

As a native Mississippian that has lived and worked all over the United States, I can say that we would welcome this facility. Mississippians, as you well know, lead the country in our amount of support for National Causes. I believe that this facility would receive the same level of support and devotion from this proud group of citizens.

We are very appreciative to have made the "final" cut of your review process. Please help us make you proud of your facility and your selection by naming Flora, Mississippi the selected site of this outstanding facility.

Sincerely,



Mike McGuffie

Comment No: 1

Issue Code: 24.5

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

McKee, Rich

Page 1 of 2

WD0349

From: Rich McKee [rich@kla.org]
Sent: Tuesday, August 19, 2008 9:57 AM
To: NBAFProgramManager
Subject: comments
Attachments: additional comments.pdf

1|5.0: Please find attached additional comments of the Kansas Livestock Association. Thank you for giving
 2|21.4 these comments your sincere attention.

Respectfully,



Rich McKee

Comment No: 1 Issue Code: 5.0

DHS notes the commentor's support for the Manhattan Campus Site Alternative and the research to be performed at the NBAF with appropriate safety measures.

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern regarding the impact from a release of Foot and Mouth Disease (FMD). Chapter 3, Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. As set out in Chapter 3, 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 Chapter 2, Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the Animal Research Policy and Institutional Animal Care and Use Committee (APHIS). While the risk of an accidental release of a pathogen is extremely low, the economic effect would be significant for all sites. Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident. However, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Manhattan Campus Site, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area, to include agricultural livestock. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. Emergency response plans will include the current USDA emergency response plan for foot and mouth disease (FMD) which includes compensation for livestock losses. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated on the mainland.

McKee, Rich

Page 2 of 2

*Since 1894*

WD0349

COMMENTS OF THE KANSAS LIVESTOCK ASSOCIATION

With regard to:

National Bio and Agro-Defense Facility Environmental Impact Statement
DEPARTMENT OF HOMELAND SECURITYPresented by
Tracy Brunner
President

August 19, 2008

The Kansas Livestock Association (KLA), formed in 1894, is a trade association representing approximately 6,000 members on legislative and regulatory issues. KLA members are involved in many aspects of livestock production, including cow-calf/stocker enterprises, cattle feeding, seedstock production and diversified farming operations. Kansas ranked third nationally with 6.4 million cattle on ranches and in feedyards as of January 1, 2007. The state's beef industry consumes 72% of the corn, 16% of the soybeans, and 60% of the hay grown in Kansas. Cattle sales typically generate nearly two-thirds of all annual agricultural receipts, generating over \$6.25 billion in cash receipts during 2006.

These comments are an addendum to the testimony previously filed by the Kansas Livestock Association at the hearings held in Manhattan both in August of 2007 and last month. We again fully endorse the mission of NBAF, to research and develop solutions to complex human and animal diseases. At the same time, we renew our support for the proposed Manhattan site only if safety protocols remain a top priority.

During recent weeks, several members of our association have raised legitimate and heartfelt concerns regarding the proposed Manhattan location. The concern is the potential devastating impact of an unintentional release of FMD. Regardless of which proposed site is selected, the unintentional release of FMD would cripple export markets. One only has to look at the negative impact of a single case of BSE in 2003 and the resulting affect on the export market. In addition, an unintentional release of FMD would significantly depress domestic prices for meat and dairy products.

With this in mind, we reemphasize and insist the Department of Homeland Security and each of the entities applying for the potential NBAF site, place safety protocols at the top of their priorities in every decision.

Thank you for giving these additional comments, as well as our testimony at the two previous hearings, your sincere attention.

6031 SW 37th Street * Topeka, KS 66614-5129 * (785) 273-5115 * Fax (785) 273-3399 * E-mail: kla@kla.org * www.kla.org

McKellar, Bill

Page 1 of 5

WD0317

From: William McKellar [REDACTED]
Sent: Monday, August 18, 2008 10:35 AM
To: NBAFProgramManager
Subject: Human Rights of Butner's Patients
Attachments: As a human rights advocate-1.doc; ATT119272.htm

Begin forwarded message:

From: William McKellar [REDACTED]
Date: August 18, 2008 10:27:23 AM EDT
To: jamesjohnson2@dhs.gov

From: William McKellar
[REDACTED]
[REDACTED] NC

McKellar, Bill

Page 2 of 5

WD0317

1|25.3 As a human rights advocate for the developmentally disabled in Butner, I am protesting the possible placement of a National Bio-Agro Research Defense Facility by the Department of Homeland Security in Granville County. I will state my concerns.

2|15.3 The 546 developmentally and multiply disabled individuals who call Murdoch Center home, their families and guardians, and the staff at the Center were neither included nor had representation in the effort trying to site the NBAF in Butner. FUTHER, the staff of Murdoch Center was forbidden by North Carolina government from discussing a NBAF placement in Granville County while at work, and they could not support or oppose on behalf of Murdoch. Many employees misunderstood the policy and were afraid to speak out. The residents of Murdoch Center, their families and guardians, and the staff were not included as interested groups concerned with siting of the NBAF.

No notification was given to the 546 residents at Murdoch Center. Parents, families, guardians living outside of the Butner-Creedmoor News distribution area received no notification either. Withholding notification of such a major project within 2 miles of Murdoch Center is morally wrong.

The individuals who live at Murdoch Center are not competent to protest getting a NBAF neighbor. Therefore, as a human rights advocate, I feel that I have a duty to object the building of a BSL-4 in Butner. Also, other advocates, parents, guardians, and the staff who are responsible for their protection and safety object to the location of the NBAF in Butner.

3|17.3; 4|21.3 The DHS states, "BSL-4 labs should be located away from high traffic areas." We are concerned with transporting deadly and contagious agents and specimens through Butner and Granville County because of the accidental release into the environment that

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: 15.3

DHS notes the commentor's concern. 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. DHS is aware of the presence of the health and correctional facilities, described in Section 3.10.7.1. DHS has held public meetings and conducted outreach efforts to ensure that the surrounding communities, including officials of the health and correctional facilities, are well aware of the proposed action.

Comment No: 3 Issue Code: 17.3

DHS notes the commentor's concerns regarding transportation of pathogens. A discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. Additionally, an analysis of accidental releases during transportation is provided in the NBAF EIS under Section 3.14, Health and Safety. Information regarding the existing road conditions and potential effects to traffic and transportation from the Umstead Research Farm Site Alternative is provided in Section 3.11.7 of the NBAF EIS.

Comment No: 4 Issue Code: 21.3

DHS notes the commentor's concern about the human health and safety of the surrounding institutional residents. Chapter 3, Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. 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. A site-specific emergency response plan would be developed and coordinated with the local emergency management plan and individual facility plans regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF, and which would include stipulations for all special-needs populations.

McKellar, Bill

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WD0317

3 cont. | could infect Murdoch's residents and staff with incurable and
17.3; | harmful diseases.
4 cont. |
21.3

5 cont. | Should there be a breach of containment either during transport or
19.3; | at the NBAF site, what is the plan for evacuation the Murdoch
4 cont. | Center residents and staff without exposure? Some of the
21.3 | individuals who live at the center are so medically fragile, they
would likely die during the evacuation process. Also, the disruption
could cause severe consequences for those with violent or self
injurious behaviors.

An interface between bio-weapons research and development and the NBAF could make Butner a prime target for a terrorist attack. This concern for similar facilities thwarted earlier attempts to locate this facility near the Lawrence Livermore National Labs in California and Los Alamos, NM. Murdoch Center is just too close to the proposed site. Camp Eason, a day and weekend camp for individuals who live and work at Murdoch Center, is only one mile from the proposed NBAF site.

How many employees who provide the specialized habitations and intensive services to the multiply disabled individuals at Murdoch Center would relocate and leave employment if the NBAF was located nearby? This action would result in a critical workforce depletion at the Center.

Most disturbing is the reports by the press of last October 4, 2007 Congressional hearing and since of all the accidents and safety concerns of the BSL-4 labs, like the proposed NBAF. If there is risk of a mistake, that mistake could be too costly for our loved ones, their caregivers, and the environment. DHS documents state that there is a risk associated with all these facilities.

Comment No: 5 Issue Code: 19.3

DHS notes the commentor's concerns regarding an accident and the impact to institutionalized populations in the Umstead Research Farm site area. 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. Chapter 3, 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 Chapter 2, 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 Chapter 3, 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 Chapter 2, Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the Animal Research Policy and Institutional Animal Care and Use Committee (APHIS). 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 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.

McKellar, Bill

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WD0317

2 cont. | The residents of Murdoch Center are incapable of giving informed
15.3; | consent and will always depend on all of us to protect and care for
5 cont. | them.
19.3;

4 cont. |
21.3

Budget cuts are occurring every year, already. The number of staff is being reduced constantly. When a NBAF incident occurs and the workers will choose to take care of their own families and leave, who will help the 546 individuals who are mentally retarded and have multiple disabilities?

Who will take care of the 179 who cannot walk, 226 who are in adult diapers, 268 who have seizure disorders, 174 who require a high level of monitoring of which 105 require at least one staff with them at all times to keep them safe from themselves or others (many require 4 or 5 staff to subdue them when they have a behavioral outbeak), 459 who require diets individually modified, 81 who receive food and medications by tube, 301 who are vision impaired or blind, 92 who are hearing impaired, 57 who have to wear protective devices such as helmets, knee/elbow pads, special programming chairs and many other devices each of which requires a back-up be available at all times? Who will see that the individuals receive over 8,000 medications and treatments every day, or 3 million a year?

Behavioral concerns are always an issue. Individuals often exhibit increased behaviors during situations involving mass movement (i.e. fire drills, emergency evacuation drills). These behaviors can consist of self injury and aggression toward others. Self injurious behavior can be blows to the head with fist or open hand, slamming their head on objects and walls and floors. If immediate intervention is not done, the behaviors can result in serious injury.

Murdoch Center, also, has a number of individuals with a diagnosis of autism. Autistic individuals have a very difficult time dealing with change in environment, routine, and other aspects of their daily lives. A disruption in patterns and routines often result

McKellar, Bill

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WD0317

in an increase in appropriate behaviors, one of which being self injury.

As a member of the Human Rights Committee at Murdoch Center, I have to do all I can to protect our residents. We do not want a repeat of the euthanized victims as we saw in New Orleans after Hurricane Katrina. How would you feel about the NBAF BSL-4 Lab if one of the individuals I just mentioned, was your child, grandchild, brother or sister? You should feel the same way I do.

^{1 cont.}
25.3

Please, there is no place for the NBAF so close to our loved ones.

Bill McKellar
Member of Murdoch Center Human Rights Committee

██████████
██████████ NC ██████████
██████████

McKellar, Edie

Page 1 of 1

WD0582

From: William McKellar [REDACTED]
Sent: Sunday, August 24, 2008 1:06 PM
To: NBAFProgramManager
Subject: Not In Granville County, NC

Mr. Johnson and Mr. Cohen,

1| 25.3 | The Draft EIS did nothing to lessen my opposition to the NBAF coming to Butner. There are so many unanswered questions which lead me to believe that this is a very dangerous and secretive project. To want to build such a site in the midst of such a fragile community is outrageous. There are so many people here that do not have the

2| 20.3 | option to move, oppose or even understand such a project. The institutions we have in Butner were built for the care of the individuals living here; endangering these people is the exact opposite of what these institutions are intended for.

3| 12.3,17.3,2.0 | Among other things, I am concerned about the water, the spraying of insecticides, the transporting of hazardous material, and the general handling of everything related to Dept. of Homeland Security and the NBAF. This leads me to clearly state that WE DO NOT WANT YOU HERE!

Edie McKellar
 [REDACTED]

Comment No: 1 Issue Code: 25.3

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

Comment No: 2 Issue Code: 20.3

DHS notes the commentor's concern about the human health and safety of the surrounding institutional residents. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. 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. A site-specific emergency response plan would be developed and coordinated with the local emergency management plan and individual facility plans regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF, and which would include stipulations for all special-needs populations.

Comment No: 3 Issue Code: 12.3

DHS notes the commentor's water quality concerns and DHS acknowledges the current regional drought conditions. As described in Section 3.7.7.3.1 of the NBAF EIS, the South Granville Water and Sewer Authority has 3 to 4 million gallons per day of excess potable water capacity and could meet NBAF's need of approximately 110,000 gallons per day, currently less than 0.4% of the Authority's total current capacity. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 210 residential homes. Section 3.13.8 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste from the Umstead Research Farm Site. 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: 17.3

DHS notes the commentor's concerns regarding the handling and transport of packages containing pathogens. The general regulations governing the required NBAF handling and transport of packages containing pathogens, and a discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. Section 2.2.2.3 provides detailed information on the handling and transport of packages containing pathogens. Additionally, an analysis of accidental releases during transportation is provided in the NBAF EIS under Section 3.14, Health and Safety. Information regarding the existing road conditions and potential effects to traffic and transportation from the Umstead Research Farm Site Alternative is provided in Section 3.11.7 of the NBAF EIS.

Comment No: 3 Issue Code: 2.0

DHS notes the commentor's opinion regarding DHS's ability to operate the NBAF.

McLain, Lisa

Page 1 of 1

CD0401

From: info@athensfaq.org on behalf of Lisa McLain [REDACTED]
Sent: Tuesday, August 05, 2008 8:51 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 19.2 | As a UGA staff member concerned about the health and wellbeing of myself and other in the Athens area, I am
 2| 25.2 | strongly opposed to having NBAF in our community. The DEIS discloses an "insectary" where disease-spreading
 3| 21.0 | mosquitoes and other "vectors" will be bred. It also discloses that any release of pathogen, because of our warm,
 2 cont| 25.2 | humid climate, could (and commonsense will tell you, probably would) cause the disease to become permanently
 established in our community. Allowing the NBAF to locate in Athens would be ill considered and I will strongly
 and loudly oppose any attempt to do so. Please reconsider.

Sincerely,
 (Your Name)

Comment No: 1 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.

Comment No: 2 Issue Code: 25.2

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

Comment No: 3 Issue Code: 21.0

DHS notes the commentor's concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g., Rift Valley fever virus) becoming established in native mosquito populations, particularly in warm, humid climates, was evaluated in Sections 3.8.9, 3.10.9, and 3.14 of the NBAF EIS.

McLaughlin, Maureen

Page 1 of 1

WD0061

From: Maureen McLaughlin [REDACTED]
Sent: Monday, July 14, 2008 1:18 AM
To: NBAFProgramManager
Subject: No Bio-Terror Lab In Athens, GA

I live in [REDACTED] GA, one of the proposed sites for the new NBAF laboratory facility. In fact, I live within three miles of the area where the lab would be built. In my everyday life, I run across a broad spectrum of different types of people around Athens. My mechanic told me that he and his wife are going to sell their house if the bio-terror lab is built here. An elderly lady told me that she is more worried for her grandchildren than for herself, and is praying that the lab will not be built in Athens. For every letter of protest that you receive, there are at least ten to twenty other people who feel the same way.

1| 21.2 Several things, other than the presence of deadly pathogens up the street from my house, concern me about building this lab in Athens, a populated area surrounded by farmland. The insectorium, the latest nightmare which has been added to the plan, is a massively bad idea. Mosquitoes thrive in our climate here. Mosquitoes infected with deadly diseases are not something we want in the Athens community. We know from personal experience that insects do escape: there is a species of giant grasshopper from South America that escaped from a lab at UGA, and has infested Athens. You can understand why our level of confidence on tiny infected mosquitoes not escaping from a lab is very, very low.

2| 12.2 I am also concerned about the water issue. What happens when there is no water to run this lab? Last summer, Athenians were asked to take showers every other day rather than bathing every day. Much of the grass and local landscapers' bushes and trees died because they could not be watered. UGA turned off its fountains, and watered selected areas of grass with tanker trucks filled with lake water - until the lake nearly dried up. You could walk across parts of Bear Creek Reservoir last summer. And into an environment where this has already happened, you want to put a laboratory that uses hundreds of thousands of gallons of water a day? I don't know who is more deluded: the local government, or Homeland Security, if you think that Athens, Georgia can guarantee a steady supply of water.

3| 18.2 Now. Let's talk waste disposal. The University of Georgia has a lousy record of dealing with toxic waste, which is how I would characterize the byproducts of the bio-terror lab. In fact, the last time UGA tried to build a center for the disposal of hazardous waste, they failed miserably. Go by the Vet School, and look for the smokestack. That marks the spot for a hazardous waste disposal center that never opened because of inadequate safety measures taken into consideration during its construction. And Homeland Security and UGA will work together on this lab? Right there is another good reason not to build it.

4| 25.2 I will be at the hearings at the Continuing Education Center, along with as many friends as I can bring. Long-standing political alliances have been broken over this issue. The next group of County Commissioners is likely to look quite different from the group that endorsed this proposal. The people of Athens emphatically reject the idea of this bio-terror lab. Please keep it at Plum Island, where the threat can be more easily contained, rather than to risk
5| 24.1 the lives of hundreds of thousands of people in the metropolitan Atlanta area.

4 cont. | 25.2 Thank you for adding this letter to the "OPPOSED" pile of letters from [REDACTED] Georgia residents. I sincerely hope
6| 17.2 that you do not decide to build your lab here, because we do not want a bio-terror lab located on a busy road (football traffic would go in front of the lab) in our bustling city.

Sincerely,
Maureen McLaughlin
[REDACTED]

Comment No: 1 Issue Code: 21.2

DHS notes the commentor's concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations was evaluated in Sections 3.8.9 and 3.10.9 of the NBAF EIS as well as in Section 3.14.

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's concern regarding the proposed water use and existing water supply. Section 3.3 includes an evaluation of infrastructure including potable water, and Section 3.7 includes an evaluation of water resources. As stated in Section 3.3.3.3.1, there is adequate capacity of 43,000,000 gallons per year, but some infrastructure improvements would be required. DHS acknowledges that drought conditions exist in the region, but the NBAF would only account for a minor increase in water use compared to recent development trends.

Comment No: 3 Issue Code: 18.2

DHS notes the commentor's concern. Section 3.13.2.2 of the NBAF EIS addresses the generation, treatment, and final disposition of the waste streams that will be generated by the operation of the NBAF no matter where it is located. Section 3.13.4.3 presents information specific to waste management generated by NBAF operations if the NBAF is located at the Milledge Avenue Site. As the generator of the waste discussed in these sections, DHS (and not UGA) would retain ultimate responsibility for the proper management (i.e., onsite pretreatment and storage and offsite transportation, treatment and disposal) of the wastes generated by this facility and for ensuring that waste management is performed in accordance with applicable federal, state, and local laws, regulations, and permits.

Comment No: 4 Issue Code: 25.2

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

Comment No: 5 Issue Code: 24.1

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

Comment No: 6 Issue Code: 17.2

DHS notes the commentor's concern about the traffic congestion in the area of the South Milledge Avenue Site Alternative 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 Alternative 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.

McLucas, Bryan

Page 1 of 1

WD0395

From: Bryan McLucas [REDACTED]
Sent: Wednesday, August 20, 2008 9:27 AM
To: NBAFProgramManager
Subject: NBAF opposition in Athens

- 1|25.2 I would like to keep my public comments short and to the point. 1) I
 wholeheartedly oppose construction of the NBAF around the corner from
 2|21.2 my neighborhood. 2) I will grant that the chances of an outbreak are
 incredibly remote, but even the most miniscule chance is not worth the
 imperceivable economic impact the facility will supposedly bring. 3)
 3|12.2 Most importantly, I am wholly convinced that our community cannot
 absorb the environmental impact of the facility. There simply is not
 enough water, period.

Bryan McLucas
 [REDACTED]

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 21.2

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: 12.2

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

McMillan, AIA, Bruce

Page 1 of 1

WD0524

From: Bruce McMillan AIA, Architects, P.A. [REDACTED]
Sent: Sunday, August 24, 2008 7:47 PM
To: NBAFProgramManager
Subject: Site Selection

Sir:

1| 24.4 As a long time resident of [REDACTED] Kansas and local business person, I would support locating the NBAF facility in Manhattan and partnering with Kansas State University and the surrounding region.

Having participated in regional growth issues for the past 20 years I am fully committed to efforts to support location of the facility in this area. I join numerous others who have also shown support for selection of Manhattan and Kansas State University.

Thank you for your strong consideration.

Bruce McMillan AIA

Comment No: 1

Issue Code: 24.4

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

McNeill, Joyce

Page 1 of 1

WD0772

From: [REDACTED]
Sent: Monday, August 25, 2008 4:04 PM
To: NBAFProgramManager
Subject: NBAF deis comments

1| 26.0 |
 2| 9.0 | I am writing to express my dismay at the lack of conclusive information in the draft environmental impact statement, especially regarding air emissions. Some direct quotes from your text include:

"...has not been determined at this time..."
 "...were derived from projected activities..."

"...potential factors..."

"...numerous assumptions..."

"...cursory..."; "...proposed..."; "...if..."; "...would be..."; "...estimated..."; "...conceptual..."; "...theoretical..."
 etc., etc.!!

3| 26.0,9.0 | You have not yet determined a pathological waste disposal method, but it might be incineration. Page 3-66 states "If incineration is the selected waste disposal method, the proposed NBAF would likely be considered a major Title V air emission source..." You extrapolate operational emission rates from PIADC, a much smaller BSL-3 lab. You also extrapolate construction emissions from estimates for the Galveston NBL but do not include any of that original data. You say that potential construction emissions are selected from a comparison between GNL and the NBAF as large biocontainment facilities, but GNL is less than one third (1/3) the size of NBAF and adjacent to another building; there were no 30 acre site grading, security fencing, utilities hub and other buildings, major road construction, etc. to compare with! You use boiler emission data from PIADC, a much smaller facility, and back-up generator emissions are estimates.

4| 8.0 |

5| 26.0,9.0 | On page 3-82 you say: "The NBAF would contribute to air emissions in the region, although the amount of contribution is not known at this time." What you do not mention is that Granville County is part of the EPA's Triangle Area and it was only in December of 2007 that that area was reassigned from 8 Hour Ozone Nonattainment to Maintenance. Since the Ozone standards changed in February, 2008 from .08 ppm to .075 ppm, the Triangle Area will likely be out of compliance once the new Standard is enforced.

6| 26.0, 9.0 | You have NO hard data to back up your assertion in Table 2.5.1-4 that the Air Quality Effects on the Umstead Research Farm Site would be Minor!!

7| 25.3 | The citizens of this region do NOT WANT your NBAF.

Joyce Elaine McNeill

[REDACTED]
 [REDACTED] N.C. [REDACTED]

Comment No: 1 Issue Code: 26.0

DHS notes the commentor's opinion.

Comment No: 2 Issue Code: 9.0

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. 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: 3 Issue Code: 26.0

DHS notes the commentor's statement. The potential effects of NBAF construction and operations on air quality are discussed in Section 3.4 of the NBAF EIS. Section 3.4.1 describes the methodology used in assessing potential air quality consequences at each site. Potential construction emissions were extrapolated from a similar facility's construction approach to ozone precursors, nitrogen oxide, and volatile organic compounds. For operations, the U.S. Environmental Protection Agency dispersion modeling program, SCREEN3, was used to predict potential bounding case emissions at each site based on the current state of facility design. Should a decision be made to build the NBAF and following site selection and final design, a complete emission inventory would be developed and refined modeling performed as necessary in accordance with state-specific air quality permitting requirements. The information regarding air emissions from the Galveston National Laboratory project was used to estimate potential emissions from construction activities only and the data were appropriately extrapolated for the NBAF.

Comment No: 3 Issue Code: 9.0

DHS notes the commentor's statements regarding the air quality impacts analysis presented in the NBAF EIS. 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 and that the NBAF will comply with air quality permit requirements.

Comment No: 4 Issue Code: 8.0

See response to Comment No. 3.

Comment No: 5 Issue Code: 26.0

DHS notes the commentor's statement.

Comment No: 5 Issue Code: 9.0

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 energy generation, traffic, and incineration. Site-specific effects at the Umstead Research Farm Site alternative are discussed in Section 3.4.7. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Air pollutant concentrations 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. Section 3.4 included the new ozone 8 hour standard and DHS notes the area's redesignation from nonattainment to attainment with a vehicle maintenance plan for the Triangle area including Granville County.

Comment No: 6 Issue Code: 26.0

DHS notes the commentor's statement. The air quality effects designation has been changed to moderate.

Comment No: 6 Issue Code: 9.0

DHS notes the commentor's air quality concerns. The designation for potential effects to air quality from the proposed NBAF at the Umstead Research Farm Site Alternative has been updated in the NBAF EIS to moderate. The preliminary SCREEN3 modeling's estimated NBAF PM2.5 air contaminant concentrations combined with the PM2.5 ambient air background concentrations exceeded the national air quality standards, thereby justifying a moderate rating. Section 3.4 includes the potential effects from traffic and incineration. Site-specific effects at the Umstead Research Farm Site are discussed in Section 3.4.7. Air pollutant concentrations 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.

Comment No: 7 Issue Code: 25.3

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

McQuain, Julie

Page 1 of 1

WD0040

From: [REDACTED]
Sent: Friday, July 04, 2008 10:03 AM
To: NBAFProgramManager
Subject: COMMENT on new NABF research site

To the unnamed receiver of NABF public comment:

- 1|5.0 | The only proper site for the type of critically important but highly dangerous research to be conducted at the NABF is the one with the best *physical* isolation.
- Too many accidents have happened due to the arrogance of planning and engineering solutions, the "it can't happen here" syndrome. We dare not tempt fate with the kind of research proposed to be done at NABF with such arrogance. You must use physical isolation in addition to all the high tech bio isolation you plan.
- I don't care how much money has been spent scouting out new sites. Put another type of DHS facility in one.
- 2|24.1 | If Plum Island is the best location for isolating and preventing any accidental escapes from being spread by animal vectors to the mainland US, then that is where NABF should remain!

Julie McQuain, citizen
 [REDACTED]

Gas prices getting you down? Search AOL Autos for fuel-efficient [used cars](#).

Comment No: 1 Issue Code: 5.0

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 primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. The decision on whether to build the NBAF will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

The Department of Homeland Security Under Secretary for Science and Technology Jay M. Cohen, with other Department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

Comment No: 2 Issue Code: 24.1

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

McReynolds, Esq., Roland

Page 1 of 2

WD0796

From: Roland [roland@carolinafarmstewards.org]
Sent: Monday, August 25, 2008 5:01 PM
To: NBAFProgramManager
Subject: Comments re:NBADF Location in Butner NC

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

August 25, 2008

Roland McReynolds, Esq.
 Executive Director
 Carolina Farm Stewardship Association
 PO Box 448
 Pittsboro, NC 27312

Dear Science and Technology Directorate, Dept. of Homeland Security:

- 1| 25.3 | This letter is to express the opposition of the Carolina Farm Stewardship Association (CFSA) and its members to the location of the National Bio- and Agro-Defense Facility (NBADF) in Butner, North Carolina. The NBADF would represent a potentially catastrophic threat to the growing and successful market for pasture-raised local livestock products in the North Carolina Piedmont, with negative consequences for small family farms in the area, their animals, and the consumers and small businesses that depend on these farms. Moreover, the placement of such a facility anywhere on the mainland of the United States would create an unnecessary risk to livestock farmers.
- 2| 15.3 |

CFSA is a membership-based organization of more than 1,100 farmers and consumers in North and South Carolina that is committed to supporting locally-based organic food systems. Family farms and market gardeners that use sustainable, organic and pasture-based practices to produce a variety of livestock and dairy products are a significant portion of that membership. One-third of our membership is in the NC Triangle-region, and would be directly impacted by any pathogen event related to the NBADF were it to be located in Butner. These family farms, as well as thousands of contract livestock producers, would be driven out of business by an escape of a livestock pathogen from the facility, with dire consequences for North Carolina rural economies and food security.

cont.| 2| 15.3 |

- 3| 5.1 | CFSA respectfully suggests that the current NBADF on Plum Island in New York is the best possible location among those under consideration.

Thank you for your consideration of these comments. Please feel free to contact me for further information.

Sincerely,
 Roland McReynolds

Roland McReynolds, Esq.
 CFSA Executive Director
 PO Box 448

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: 15.3

DHS notes the commentor's concern. The economic impact of an accidental release is presented in Section 3.10.9 and Appendix D of the NBAF EIS. While the risk of an accidental release of a pathogen is extremely low, DHS acknowledges that the possible economic effect would be significant for all sites. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as \$4.2 billion until the U.S. was declared foreign animal disease-free.

Comment No: 3 Issue Code: 5.1

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

McReynolds, Esq., Roland

Page 2 of 2

WD0796

Pittsboro, NC 27312
Ph: 919-542-2402
Fax: 919-542-7401
www.carolinafarmstewards.org

McRight, Jim

Page 1 of 1

FD0096

**DEPARTMENT OF ENVIRONMENT AND
NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL HEALTH**

Project Number:
06-0390
County:
Granville

Inter-Agency Project Review Response

Project Name: US Department of Homeland Security Type of Project: BA for Umstead Research Farm at Burton for the construction/operation of the National Bio & Agro Defense Facility

1|3.3 The applicant should be advised that plans and specifications for all water system improvements must be approved by the Division of Environmental Health prior to the award of a contract or the initiation of construction (as required by 15A NCAC 19C .030001, et seq.). For information, contact the Public Water Supply Section, (919) 733-2321.

This project will be classified as a non-community public water supply and must comply with state and federal drinking water monitoring requirements. For more information the applicant should contact the Public Water Supply Section, (919) 733-2321.

If this project is constructed as proposed, we will recommend closure of _____ feet of adjacent waters to the harvest of shellfish. For information regarding the shellfish sanitation program, the applicant should contact the Shellfish Sanitation Section at (252) 726-6827.

The soil disposal area(s) proposed for this project may produce a mosquito breeding problem. For information concerning appropriate mosquito control measures, the applicant should contact the Public Health Pest Management Section at (919) 733-8407.

The applicant should be advised that prior to the removal or demolition of dilapidated structures, an extensive rodent control program may be necessary in order to prevent the migration of the rodents to adjacent areas. For information concerning rodent control, contact the local health department or the Public Health Pest Management Section at (919) 733-8407.

The applicant should be advised to contact the local health department regarding their requirements for septic tank installations (as required under 15A NCAC 18A, 1900 et. seq.). For information concerning septic tank and other on-site waste disposal methods, contact the On-Site Wastewater Section at (919) 733-2865.

1Cont|3.3 The applicant should be advised to contact the local health department regarding the sanitary facilities required for this project.

2|8.3 If existing water lines will be relocated during the construction, plans for the water line relocation must be submitted to the Division of Environmental Health, Public Water Supply Section, Technical Services Branch, 1534 Mail Service Center, Raleigh, North Carolina 27699-1834, (919) 733-2321.

For Regional and Central Office comments, see the reverse side of this form.

Jim McRight PWSB 07/08/08
 Reviewer Section/Branch Date

Comment No: 1 Issue Code: 3.0

DHS notes the commenter's identification of State and local regulatory requirements for infrastructure improvements undertaken by public utilities. In addition, DHS and USDA would ensure that the NBAF operation at the Umstead Research Farm site will comply with all applicable local, state, and Federal regulations.

Comment No: 2 Issue Code: 8.3

DHS notes the information provided by the commentator.

McVey, Wanda

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MD0044

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Written before
receiving report

To Whom It May Concern:

I sincerely appreciate receiving the June 2008 Draft Environmental Impact Statement.

I realize the economic and scientific impact it would have for Manhattan and KSU. Naturally, I have many reservations with respect to locating the facility in Manhattan. It could be construed that "we just don't want it in our front or backyard - there is more to it than that."

Why not in an area not populated by people or livestock? The hazard to surrounding population and research outweighs any perceived advantage of locating in Manhattan. Years and years of research by many K-State scientists could be momentarily destroyed. We are aware of what happened in Britain. It was worse than we can imagine because we were not there.

The collateral damage to the livestock industry of Kansas and surrounding states cannot realistically be anticipated. In Kansas alone farmers and ranchers face the possibility of various natural disasters - weather (wet or dry), hail, wind, floods, and tornadoes, as well as hot & cold.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 5.0

DHS notes the commenter's suggestion. As described in Section 2.3.1, DHS's site selection process incorporated site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or sem-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.

Comment No: 3 Issue Code: 15.4

DHS notes the commenter's concern. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. As noted in Section 3.10.9 and Appendix D, the major economic effect from an accidental release of a pathogen would be a ban on all U.S. livestock products until the country was determined to be disease-free. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

McVey, Wanda

Page 2 of 5

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MD0044

Why develop another possible hazard for them to face?

4|21.4 I would think that a model facility could be used to research the capability of a facility to withstand earthquakes and tornadoes. There are wind tunnels used for various types of research.
5|11.4 With respect to earthquakes millions are being spent on Tuttle Creek Dam to hopefully withstand earthquakes of a certain magnitude.

6|5.0 I imagine there were unbelievable resources made available to provide for nuclear testing in Yucca Flats. I realize the cost of development there would be great and take time but that cost could possibly be far less than losses we could anticipate to occur by putting the facility amidst people, livestock, and already existing research.

7|21.4 We hear the protective measures but please inform us as to a worst-case scenario. With respect to radius of contamination, would there be time to leave the area or would it immediately be "too late".

Comment No: 4

Issue Code: 21.4

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

Comment No: 5

Issue Code: 11.4

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

Comment No: 6

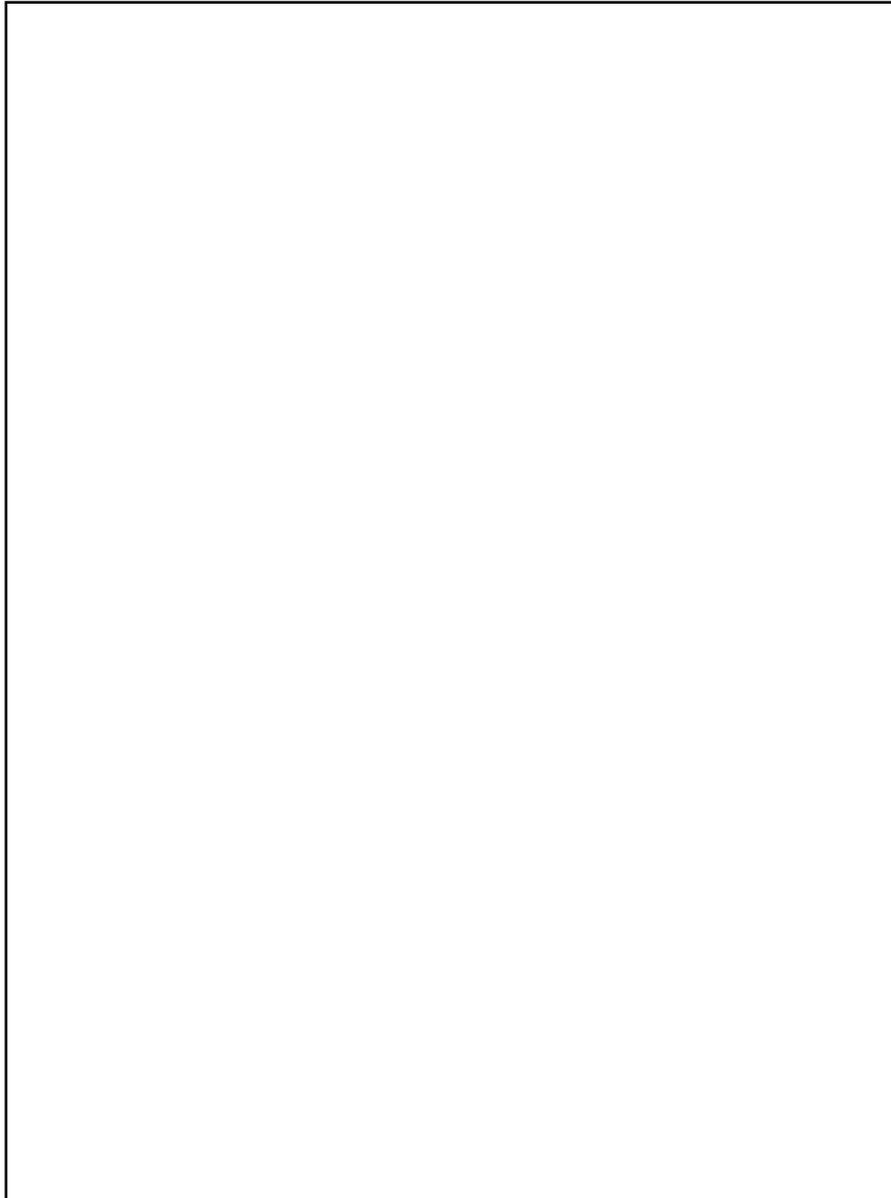
Issue Code: 5.0

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 EOI.

Comment No: 7

Issue Code: 21.4

DHS notes the commenter's concern. A site-specific emergency response plan would be developed and coordinated with the local emergency management plan regarding evacuations and other



emergency response measures for all potential emergency events including accidents at the NBAF. The type of, duration, and geographical extent of quarantine would be determined by the appropriate authorities depending on the pathogen released and contamination level.

McVey, Wanda

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MD0044

I am not a scientist as you undoubtedly realize. I live 1/2 mile from the proposed site, others live across the street and the Veterinary Medicine complex adjoins the site. Additionally livestock is equally close.

With respect to the present location at Plum Island - is that area reluctant to lose the facility or are they looking forward to the possibility?

For my unsophisticated concerns I just cannot be supportive of having the NBAF located in Manhattan.

Thanks for all your untiring efforts & thanks for listening!!

Sincerely,
Wanda McVey
[Redacted]

7-24-08

I wrote the enclosed 3 pages before I had an opportunity to read through the report with respect to some of my concerns. Personally I am within the first area of concern should some accident occur. Additionally, figures reflecting anticipated losses to livestock industry, etc., confirm my opposition to the project. 

1 cont. | 25.4

1 cont. | 25.4

McVey, Wanda

Page 4 of 5

MD0044

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Please keep me on the mailing list if other communications are sent. Thanks again!

McVey, Wanda

Page 5 of 5

Comment No: 8 Issue Code: 27.0
DHS notes the information submitted by the commentator.

MD0044

Risks of NBAF are too great to accept

Paul B. Irvine
Contributing Writer
771 4th Avenue
Manhattan, NY 10018
7-23-09

I am writing to express my strong opposition to building the National Bio- and Agro-defense Facility (NBAF) in Manhattan. Everyone agrees that research and countermeasures against man-made disease are vitally important. With the potential for a global pandemic release, however, there are many reasons the facility should not be placed here in the center of the United States and in the heart of livestock country.

One of the diseases to be studied at NBAF is foot-and-mouth disease, which affects all cloven footed animals, including horses, cattle, sheep, pigs, and deer. In the United Kingdom, a foot-and-mouth disease outbreak in 2001 resulted in more than \$10 billion in losses to tourism and the agriculture sector and the slaughter of more than 4 million animals. Another outbreak occurred in England in 2007, which was apparently caused by a drainage leak from a research facility. In the United States, run as high as \$24 billion, with the destruction of about 13 million animals. Global trading partner bans on imports from a single case of foot-and-mouth disease could result in losses of between \$6 billion and \$10 billion per year until problems were eliminated. The U.S. Department of Agriculture estimates that a single case of foot-and-mouth disease could spread to 25 states in as little as five days. According to the U.S. Centers for Disease Control and Prevention, nearly 70 percent of human infectious disease episodes during a 10-year

“It is difficult to understand how anyone who has really considered the implications could ever want to put this facility ... in the middle of the large concentration of livestock.”

period in the United States were attributed to zoonotic pathogens — diseases transmittable from animals to humans. Two diseases that are zoonotic to be studied in the NBAF are Rift Valley fever virus and Nipah. According to information from the internet, Nipah has about a 50-percent mortality rate for humans, with no known zoonotic pathogen release were to occur at the NBAF, would there be a human quarantine? The environmental impact study released in June deals extensively with accident scenarios involving the release of pathogens, their effect on workers, the public and the environment.

are a reality of life. They said the Titanic was unsinkable. Any release of pathogens could affect not only the livestock industry but the entire community. What we stand to gain as individuals, as a community or as a state should not be leveraged in light of what we risk. It is difficult to understand how anyone who has really considered the implications could ever want to put this facility in the middle of the concentration of livestock. The jobs and dollars vital to the local economy are not worth the risk. This facility should be built, but it should be built on Plum Island, N.Y., which is owned by the Department of Homeland Security. Plum Island has infrastructure and security that can protect the facility and protect the public and the environment. The objective of this facility should be to protect people and animals, not put them in jeopardy. It should be built somewhere where it poses the least risk to that which we are striving to protect. The information presented here was obtained from the Environmental Impact Study, dated June 2008. Farmers and ranchers concerned about this potential threat to their livelihood should make their opinions heard at the K-State Union on July 31, when DHS will hold two public hearings. One will be from 12:30 to 4:30 p.m., and one will be from 6 to 10 p.m. Persons unable to attend these meetings should contact the author at www.dhs.gov/hdab (click on public involvement).

Paul B. Irvine, 3370 Casement Road, is a third generation Riley County farmer and rancher.

8 | 27.0

Meadows, Betty

Page 1 of 1

PD0117

August 20, 2008

My name is Betty Meadows. I live in [REDACTED] Georgia, at [REDACTED] which is very close to the projected area that is considered for the lab.

1|25.2 I do object. I feel that they should not even consider that area in the middle of residential...very close to residence and to stores and restaurants.

I don't understand them even considering that area.

So, I appreciate your allowing me to comment, but I just can't comprehend this kind of decision.

Thank you.

Comment No: 1

Issue Code: 25.2

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

Means, Bob**Page 1 of 1**

WD0326

From: Bob Means [REDACTED]
Sent: Monday, August 18, 2008 2:13 PM
To: NBAFProgramManager
Subject: NBAF

1|24.4 | Please accept this comment in support of locating the National Bio and Agro-Defense Facility (NBAF) within the State of Kansas and, more specifically, at Kansas State University.

The K-State Manhattan Campus site meets the NBAF mission requirements better than any other potential site. DHS specified that the NBAF should be "within a comprehensive research community that has existing research programs in areas related to the NBAF mission requirements." The proposed NBAF site adjoins the Biosecurity Research Institute (BRI) in Pat Roberts Hall, which is a BSL-3/BSL-3Ag biocontainment facility in the same mission space as NBAF. It's next to the College of Veterinary Medicine, which has broad vaccinology and pharmacology expertise.

1 cont. |
24.4 | Thank you for allowing me to express my support.

Bob Means
[REDACTED] Kansas

Comment No: 1Issue Code: 24.4

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

Mebus, DVM, PhD, DSc, Charles

Page 1 of 1

WD0084

From: [REDACTED]
Sent: Thursday, July 17, 2008 7:56 AM
To: NBAFProgramManager
Subject: location of lab

Comment on the location of the Foreign Animal Disease Laboratory.

- 1) 24.1 If work on FMD is to be limited to in-vitro work, I have no objection to the laboratory being located on the mainland. However, if animals, particularly cattle and pigs, are to be infected, the laboratory should remain on Plum Island. Infected cattle and pigs produce high titered infectious aerosols. Even with the current filtration systems, it is not worth the risk of having the laboratory at any of the other proposed locations. The prevailing summer wind at Plum Island is from the southwest which would carry any release over 15 miles of water to a populated area. In the winter it is from the north, and again a release would go over the water to a populated area.
- 2) 19.1 Many countries would like to have a reason to embargo agricultural products from the US. Look what the last outbreaks of FMD in the UK did to exports.
- 3) 15.0

Charles A. Mebus, DVM, PhD, DSc

Comment No: 1 Issue Code: 24.1

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

DHS notes the commentor's concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. All animal holding areas would be inside the facility and all infected animals would be maintained in the appropriate biosafety level containment areas.

Comment No: 2 Issue Code: 19.1

DHS notes the commentor's concern. Sections 3.14.2, 3.14.3, and 3.14.4.4 of the NBAF EIS describe the accident analysis, methodology, and site-specific consequences.

Comment No: 3 Issue Code: 15.0

DHS notes the commentor's concern. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the economic effect would be significant for all sites. In particular, the potential effects to livestock-related industries are discussed in Section 3.10. As noted in Section 3.10.9 and Appendix D, the major economic effect would be result from a potential ban on all U.S. livestock products until the country was determined to be foreign animal disease-free.

Meiring, DVM, DACVPM, Richard

Page 1 of 3

WD0433

From: Richard Meiring [Meiring@cvm.msstate.edu]
Sent: Thursday, August 21, 2008 11:16 AM
To: NBAFProgramManager
Subject: NBAF
Importance: High
Attachments: NBAF-FLORA.pdf

Mr. Johnson

A letter of support of Flora, MS is attached. Thank you.

Richard W. Meiring, DVM, DACVPM
Director of Recruitment and Admissions
Clinical Professor
Department of Pathobiology and Population Medicine
College of Veterinary Medicine
Mississippi State University
P. O. Box 6100
Mississippi State, MS 39762
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Meiring, DVM, DACVPM, Richard

Page 2 of 3



Mississippi State
UNIVERSITY

College of Veterinary Medicine

WD0433

August 21, 2008

James V. Johnson
United States Department of Homeland Security
Science and Technology Directorate
245 Murray Lane, SW
Building 410
Washington, DC 20528

Dear Mr. Johnson:

1 | 24.5 | I am writing to support the NBAF laboratory that is proposed for Flora, MS. Locating NBAF in Mississippi should be a win: win for both your department and the State of Mississippi. Although I am a relative newcomer to Mississippi, I have been involved with science and animal agriculture for over thirty-six years. I base my support on that experience.

1 cont. | I am currently a faculty member in the Department of Pathobiology/Population Medicine in the College of Veterinary Medicine at Mississippi State University. I also am a past-president of the American Association of Bovine Practitioners. Both have allowed me to understand the importance of NBAF to our national defense and to the understanding of foreign animal diseases. It is apparent that a new location for the facility must be selected. I believe Flora, Mississippi fulfills the requirements to be the new home for NBAF.
24.5 |

2 | 8.5 | As I speak to livestock producers within the state, I find enthusiasm for this endeavor. Mississippi livestock producers are satisfied with the biosecurity and understand the importance of research into these potentially devastating diseases. They would be honored to have NBAF in their state. Likewise, the College of Veterinary Medicine and its faculty look forward to having such a valuable resource in our state. The possibilities for collaborative projects are endless.



P.O. Box 6100 • Mississippi State, MS 39762 • (662) 325-3432

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 information provided by the commentator.

Meiring, DVM, DACVPM, Richard

Page 3 of 3

WD0433

2 cont. |
8.5

As new Mississippi residents, both my wife and I have quickly come to understand that many people outside of this state seriously underestimate the infrastructure and the expertise available within Mississippi. Opportunities are available here that cannot be found in many other states.

1 cont. |
24.5

Locating NBAF in Flora, MS would certainly benefit the citizens of both Mississippi and the United States. If I may be of future assistance, please do not hesitate to contact me.

Sincerely,



Richard W. Meiring, DVM, DACVPM

Clinical Professor

Past-president, American Association of Bovine Practitioners