We in Mississippi are very excited by the possibility our State may be chosen for this site. We hope you accept our hospitality and we truly hope you select Flow Mississippi for the new Lab.

We have the talent to staff the operation and people willing to work for an operation offering above average earnings and opportunities and benefits. We sincerely hope you pick Mississippi and we look forward to working with you.

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

Page 1 of 1

August 25, 2008

Yes.

My name is Scott Moak and I live in [redacted], Mississippi, and I am calling on behalf of the proposed Flora, Mississippi site, and just wanted to express my... I want to express my feelings concerning the importance of that to the State of Mississippi.

As a life long Mississippian, raises a family here with two small children, and being from this area, I think that this would provide a tremendous amount of support of our community. It would keep some of our brightest students here in the State of Mississippi and provide our students and children, that will shape our future, a greater opportunity to succeed here in the State of Mississippi.

I think there is a tremendous amount to offer, and I just wanted to express my opinion and passion for bringing a facility such as this, to our state and the impact that we can have working together.

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

I am requesting that the NBAF is NOT built in NC. We do not need this type of industry and its associated risk in our backyards!
Don Moede
DHS notes the commentor’s concerns. The NBAF would be designed, consumed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g., Rift Valley Fever Virus) becoming established in native mosquito populations was evaluated in Section 3.8.9 and Section 3.10.9, as well as in Section 3.14.
The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Should the NBAF Record of Decision call for the design, construction, and operation of the NBAF then site-specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the NBAF. Section 3.8.9 of the NBAF EIS addresses existing and potentially applicable response plans that provide insight into some of the livestock and wildlife protective and mitigating measures that could be employed in the event of a pathogen release from the NBAF.

DHS notes the commentor’s concern regarding depopulation measures to control a disease outbreak. As described in Section 3.8.9.1 of the NBAF EIS, depopulation control measures could be undertaken given a worst-case scenario to prevent a widespread outbreak among wildlife and domestic livestock, should an accidental release of the foot and mouth disease virus occur. Section 3.14 and Appendix E investigate the chances of a variety of accidents that could occur and consequences of those 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. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases.
Monroe, John

Page 1 of 3

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

DHS notes the commentor’s concern. A site-specific emergency response plan will be developed and coordinated with the local Emergency Management Plan regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF. DHS is aware of and has considered the presence of the health and correctional facilities, described in Section 3.10.7.1 of the NBAF EIS. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 and Appendix E of the NBAF EIS. The risks were determined to be low for all site alternatives. The need to establish a quarantine zone or to necessitate an evacuation in response to a release, and particularly actions that would affect the special-needs populations of concern, would be a very low probability event. The response measures discussed in Section 3.8.9.1 of the NBAF EIS relative to a release of FMD virus, for example, would not be expected to impact the health and safety of special-needs populations. 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, and which would include stipulations for any special-needs populations including institutionalized populations.

DHS notes the commentor’s concerns regarding the treatment and discharge of NBAF generated wastewater by the South Granville Water and Sewer Authority (SGWASA). The impact from the operation of the NBAF at the Umstead Research Farm Site on the SGWASA wastewater treatment infrastructure is discussed in Section 3.3.7.3.4 of the NBAF EIS. The design and operation of the NBAF at the Umstead Research Farm Site would prevent negative impact to the SGWASA Sewage Treatment Facility infrastructure and treatment capabilities. Specifically, as summarized in Section 3.15 of the NBAF EIS, pre-treatment of liquid waste streams would be implemented as necessary to meet treatment facility acceptance criteria, therefore avoiding potential impacts.

DHS notes the commentor’s concern regarding the state and local government’s cost associated with constructing the NBAF. Funding for the design, construction, and operations for the NBAF will come from the Federal Government. Proposals for offsets to the site infrastructure (part of the construction costs) were requested by the Federal government. The decision as to what to offer (land donation, funding, other assets) is solely as the discretion of the consortium, state and local officials as part of the consortium bid site package. The amount of funding and how the funding is paid for (bonds, taxes, etc) is determined by the state and local government officials and not the decision of the Federal government.

Comment No: 1 Issue Code: 25.3

Secretary Michael Chertoff
US Dept of Homeland Security
Washington DC 20528

August 23, 2008

Dear Michael,

I hope you remember me; I was a classmate of yours in the class of 1971 at Pingry. We had different friendship groups and you were taking more of the advanced classes than I was. Anyway, it has been very interesting to watch your career path. To catch you up with me, briefly, I went to Univ. of Michigan, and then received my Ph.D. in Clinical Psychology at University of Detroit. After graduation, I moved to near Butner NC and worked as a staff psychologist at an adolescent psychiatric hospital in Butner. A few years later, I entered private practice for close to 20 years until I decided to change my career and start a rare tree nursery.

Now, the reason I am writing: I have been very involved in the grass roots effort to stop the siting of the N-BAF lab in Butner. While there may be a valid argument over the issue of the proliferation of BSL-3 and BSL-4 labs and the risk they present to the US citizens, my concern is more specifically related to the Butner site. Butner is a unique community in NC, in that it is home to a multitude of state and federal institutions. Many of the people who live in Butner have devoted their lives to caring for these institutionalized persons. The possibility that a loss of bio-containment might require the evacuation or quarantine of the 4500 institutionalized would create an impossible situation and those that live here know that.

There are other issues including the inadequacy of the community sewage plant to handle just regular sewage, and that the site is in the midst of 5
DHS notes the commentor's water supply concerns and DHS acknowledges the current regional drought conditions. As described in the 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, which is 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 3.7.7 describes the Umstead Research Farm Site's surface water and watershed features.
Monroe, John

Page 2 of 3

Comment No: 5  Issue Code: 26.0
DHS notes the commentor’s statement. 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. All comments
received during the scoping process were reviewed and considered during the preparation of the
NBAF EIS.

watersheds providing water to Raleigh, Durham, Stem, Creedmoor and
Butner. Being on the tail end of a severe drought has everyone sensitive to
water supply issues.

For these and many other reasons the lab, that initially enjoyed widespread
support from local officials, now, is being opposed by almost all. The Raleigh
City Council, Durham City Council, Durham County Commissioners, The
Town of Butner, Town of Stem, Town of Creedmoor, and Granville County
Commissioners all have come out opposing the siting of the lab in Butner.
NC. State Senator Doug Berger is actively opposing the site and US Rep
Brad Miller has also said he is now opposing the lab. The citizens here are
united in opposing the lab. In addition, the NC legislature has not provided
for any money for infrastructure that would be needed to provide utilities to
the lab.

The content of the D-EIS was widely disappointing as it was very incomplete.
Even the NC Consortium, which is the local group of university and private
companies trying to land the lab here, admitted that the D-EIS fell short.
Questions asked at the Scoping hearing and by City of Raleigh and Durham
County Commissioners simply weren’t answered in the document.

The Triangle may have a great work-force and it is a very nice place to live,
but I think you would have to agree that it would not be a wise decision to
site a lab where the opposition is so very strong both on a citizen level and
elected official level.

I hesitated to write this to you, but I decided that you, or the person
charged with the responsibility to make the decision, would want to make
the best decision for this national lab and I wanted to make sure that you
knew what the situation was here in Butner.

Sincerely,

John Monroe Class of 1971
Mississippi Manufacturers Association
The Voice of Industry
www.mma-web.org
730 W. President Street (33232)
P. O. Box 22807
Jackson, MS 39225-2807
Phone: 601-948-1322
Fax: 601-948-1475

Date: August 25, 2008

To: Mr. James V. Johnson
U.S. Department of Homeland Security

From: JAY C. MOON

Fax Number: 1-866-508-6223

Total number of pages, including this page: 2

Letter in favor of the National Bio & Agro-Defense Facility
DHS notes the commentor's support for the Flora Industrial Park Site Alternative.
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Eight years ago we made the choice to build our retirement home here. Right down the street from the beautiful Botanical Gardens and peaceful surrounding area. We have so enjoyed some of our remaining years in a wonderful pastoral setting with little traffic, no pollution, and lots of trees. How dare you allow anyone to destroy an area that has become a little bit of heaven to us after working 55 years in a city environment. It will literally be slapping us in the face with something we do not want in our residential area. Hopefully you will not let this happen to us. Yours for a clean Athens, Carol J. Moore, Ga.
Moore, Charles

Page 1 of 1

DHS notes the commentor's concern regarding the NBAF. As described in Chapter 1 of the NBAF EIS, DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.

Section 3.14 and Appendix E of the NBAF EIS evaluate the potential effects on health and safety of operating the NBAF at the six site alternatives. The evaluation concludes that a pathogen release at the Plum Island Site would be slightly less likely to result in adverse effects than the mainland sites.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's support for the Plum Island Site Alternative.

Comment No: 3 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 1 Issue Code: 21.4
DHS notes the commentor's concern regarding the NBAF. As described in Chapter 1 of the NBAF EIS, DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.

Comment No: 1 Issue Code: 21.4
DHS notes the commentor's concern regarding the NBAF. As described in Chapter 1 of the NBAF EIS, DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.

Section 3.14 and Appendix E of the NBAF EIS evaluate the potential effects on health and safety of operating the NBAF at the six site alternatives. The evaluation concludes that a pathogen release at the Plum Island Site would be slightly less likely to result in adverse effects than the mainland sites.
DHS notes the commentor's opposition to the Texas Research Park Site Alternative.

Myfe Moore's family is OPPOSED to having a bio-defenses facility in our town of [REDACTED]. We will leave the San Antonio area if you build it.

I would like to be on your email information list:
Ms. Myfe Moore
[REDACTED], TX
Moore, Wendy

Page 1 of 2

From: Wendy Moore
Sent: Monday, August 25, 2008 10:37 PM
To: NBAFProgramManager
Subject: NBAF Public Comment for Athens, GA site

Dear Mr. Johnson and Committee Members,

On August 14, I attended the NBAF public hearing held in Athens, GA. Listening to the presentation and the comments that evening, reviewing the Environmental Impact Statement and the GAO report, and reading investigative reports from the Associated Press, have led me to believe that Athens, GA should not be the home of NBAF.

1) 5.2
My primary objection is not to NBAF itself. Research of this type has had and will still be in the future need to be conducted. Athens, GA has many synergistic relationships to offer that would be of benefit to NBAF. Had the Athens, GA College Station Rd site been more seriously considered and selected, I would probably not be writing this objection letter. My primary objection is with the Milledge Ave site selection.

2) 1.0
The location of this site next to the Oconee River, the State Botanical Gardens, and Whitehall Forest is completely unacceptable. This is a very special tract of land in our otherwise very urban/suburban county. Building any giant building on this property or developing a new subdivision would be fought hard by Athens citizens. A building the size of 5 WalMarts, putting aside other environmental concerns, is inappropriate. This is really just suburban sprawl - putting buildings, infrastructure, and future development in an area that is not developed - and encouraging future abandonment of current facilities on College Station Rd. The Milledge Ave site seems to have been selected over the College Station Rd site because it was "empty," easy to build on, and easy to acquire from the ever eager University of Georgia. Those selection criteria does not a good first impression make.

3) 8.2
3 cont...

4) 13.2
4 cont...

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden and Whitehall Forest. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden or Whitehall Forest. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and Whitehall Forest. Minor noise impacts would result from an increase in traffic and operation of the facility's filtration, heating, and cooling systems. Section 3.5.5.3 describes noise-attenuating design features that would minimize noise emissions. In the event of a power outage, operation of back-up generators could have a short-term impact on wildlife by discouraging utilization of immediately adjacent habitats. Routine operations at the proposed NBAF would not be likely to have significant noise impacts on wildlife. Security requirements at the proposed NBAF would require continuous outdoor nighttime lighting. Nighttime lighting has the potential to impact wildlife through...
astronomical and ecological light pollution. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigation measures, such as the use of shielded lighting, will be considered in the final design of the NBAF. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. However, the use of shielded lighting would minimize the potential for impacts in adjacent habitats. Given the relatively low profile of the building and the use of mitigative measures, significant lighting impacts on migratory birds would not be likely to occur.

The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Potential impacts on the Middle Oconee River would be mitigated by low impact design (LID) features, BMPs, and a storm water pollution prevention plan (SWPPP). As described in Section 3.3.3.1.4, sewage acceptance criteria and pretreatment requirements would apply to the wastewater discharged from the proposed NBAF. The NBAF would be designed and operated as necessary to comply with Athens-Clarke County Middle Oconee Wastewater Treatment Facility criteria and avoid the discharge of potentially harmful wastewater constituents. The mitigation measures described above would prevent significant impacts on downstream aquatic resources such as the Middle Oconee River.

Comment No: 5 Issue Code: 15.2
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.
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.
DHS notes the commentor’s statement. Section 3.14 and Appendix E of the NBAF EIS evaluate the potential effects on health and safety of operating the NBAF at the six site alternatives. The evaluation concludes that a pathogen release at the Plum Island Site would be slightly less likely to result in adverse effects than the mainland sites.

Other things, such as the GAO statement that NBAF is only appropriate on Plum Island also have led me to believe that Athens, GA with its animal agriculture, deer population, insect population, and weather patterns would be a poor choice in location. I am also concerned about the role politics and backscratching that has played in the NBAF site selection - a decision that should have been solely based on science - and that concern and lack of information from truly independent sources leads me to believe that NBAF should not be located in Athens, GA and probably should be constructed as a new facility (currently not proposed) on Plum Island.

Thank you for considering these comments.

Sincerely,

Wendy E. Moore

GA
Comment No: 1  Issue Code: 25.0
DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 2  Issue Code: 24.1
DHS notes the commentor's support for the Plum Island Site Alternative.

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 possible economic effect would be significant for all sites.

Section 3.10.9 of the NBAF EIS presents estimates of the possible economic effect of an accidental release.
DHS notes the commenter's opposition to the five mainland site alternatives. Section 3.14 and Appendix E of the NBAF EIS evaluate the potential effects on health and safety of operating the NBAF at the six site alternatives. The evaluation concludes that a pathogen release at the Plum Island Site would be slightly less likely to result in adverse effects than the mainland sites.

DHS notes the commenter's position and concern for locating NBAF in a location isolated from livestock. 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.
RESOLUTION

OPPOSING A MOVE OF THE PLUM ISLAND FOREIGN DISEASE RESEARCH CENTER FROM NEW YORK STATE TO THE MIDWESTERN UNITED STATES

WHEREAS, it has been proposed that the Plum Island, New York, Foreign Disease Research Center be relocated to the Midwestern United States;

WHEREAS, substantial numbers of livestock are raised in the Midwest thereby supporting a huge industry and many operators;

WHEREAS, should the lab be relocated from its isolated location, the risk of spreading devastating diseases to our livestock is exponentially increased.

RECOMMENDATION

BE IT RESOLVED, that Arthur County opposes any relocation of said Plum Island facility.

Moved, Passed, and Adopted this 1st day of August, 2008

ROBERT L. MILLER, Chairman
VIRGIL GRAY, Commissioner
WILLIAM M. S. WILSON, Commissioner
RON JAGGER, Commissioner

Page 3 of 3
Morelock, Patti

Page 1 of 1

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


From: Patti Morelock
Sent: Friday, August 22, 2008 12:14 PM
To: NBAFProgramManager

I support the National Bio and Agro-Defense Facility in Kansas. Our research in Kansas will enable the success of NBAF.

Patti Morelock
Morgan, Melanie

Page 1 of 1

Comment No: 1                     Issue Code: 2.0
DHS notes the commentor’s concern over the need for the proposed NBAF. The purpose and need for the proposed action is discussed in Chapter 1 of the EIS.

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.

Comment No: 2                     Issue Code: 25.2
DHS notes the commentor’s opposition to the South Milledge Avenue Site Alternative.

From: info@athensfaq.org on behalf of Melanie Morgan
Sent: Friday, August 01, 2008 7:38 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

the IDES study shows that the Athens, GA site is neither safe nor compatible from an environmental standpoint for the construction of NBAF. The everlasting facts put out by UGA and DHS add to my scepticism.

I am strongly opposed to NBAF and will continue to actively work against any effort to bring NBAF to our community, or maybe find another small town far away from NBAF.

Sincerely,
Melanie Morgan
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

From: Kim Morris
Sent: Tuesday, August 19, 2008 7:18 PM
To: NBAFProgramManager
Subject: opposition to NBAF

1/25.2 I wanted to indicate that I strongly oppose having the NBAF come to Athens.

--
Kim Morris, MS
DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

---

From: Steve Morris
Sent: Monday, August 25, 2008 10:23 AM
To: NBAFProgramManager
Subject: Support for the NBAF project in MS

Gentlemen,

I strongly support the initiative to bring the NBAF facility to Flora, MS.

Steve Morris

Laws Construction has had this message scanned for viruses by Message Labs.
Morrison, Aileen

Page 1 of 1

August 22, 2008

Dear Sir,

This is Aileen Morrison from [Redacted] Mississippi writing to let you know of my support for locating the National Bio & Agro Defense Facility in Flora, Mississippi. I am proud to say I am a long time resident of Jackson, Mississippi. I know the people of MS will do the best job for your company. We have a great quality of life here and want to have the opportunity to show the nation we are the best people to do the job. Our people will do everything necessary to be a part of protecting our nation’s security.

We have the education facilities and the hard working people available to the job. I urge you to select Flora, Mississippi for the site of your company’s new site. We will do the best job and will be proud to have your company in Mississippi.

Sincerely,

Aileen Morrison

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 statement.

Comment No: 3         Issue Code: 8.5
DHS notes the commentor’s statement.
DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

From: [Redacted]
Sent: Thursday, August 21, 2008 5:26 PM
To: NBAFProgramManager
Subject: NBAF Flora, Mississippi

To whom it may concern,

I am writing to support the National Bio and Agro Defense Facility and the possibility of being built in Flora, Mississippi. Our community is friendly to this project and will seek anyway to make it a reality and a success.

Sincerely,
J. Wayne Morrison, P.E., P.L.S.

It's only a deal if it's where you want to go. Find your travel deal [here](#).
Moulder, Melissa

Page 1 of 1

Comment No: 1 Issue Code: 21.0
DHS notes the commentor's concern regarding the siting, construction and operation of the NBAF at the South Milledge Avenue Site. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and consequences of those 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.

Comment No: 2 Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

WD0041

From: Melissa Moulder
Send: Friday, July 04, 2008 1:31 AM
To: NBAFProgramManager
Subject: Athens GA site proposal

To whom it may concern,

I just recently moved back to GA after relocating to CA for a couple of years. I consider GA to be my home-town and am very glad to be back. The NBAF proposal that is being considered for Athens has just come to my attention.

As a Student Family Nurse Practitioner, this concerns me a great deal. I am sure all measures would be taken to prevent any viral contamination to the public, but if this were to occur, it could be catastrophic. Already, we are having a very serious issue with resistant bacteria and viruses in this part of the country.

This issue is, of course, on the rise worldwide. Due to this concern as well as the water usage this type of facility would render, makes me very much in opposition to this proposal. Georgia needs to conserve as much water as possible and this type of facility would only put more burden on another serious issue.

One thing I know, the people of Athens are very concerned about what happens in their community. In an effort to maintain as much integrity as possible, the community of Athens does research and works very closely together to keep the community the healthiest it can.

Please reconsider your proposal for this area. It is not well suited for GA, especially in close vicinity to the Botanical Gardens. We are a very educated and concerned group of people and hope you will consider our opinions.

Sincerely,

Melissa Moulder, RN, Student FNP

Comment No: 1 Issue Code: 21.0
DHS notes the commentor's concern regarding the siting, construction and operation of the NBAF at the South Milledge Avenue Site. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and consequences of those 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.

Comment No: 2 Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.
Mounts, William

Page 1 of 2

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

Comment No: 2  Issue Code: 6.2
DHS notes the information submitted by the commentor. Section 3.2.3 acknowledges the proximity of the University of Georgia Livestock Instructional Area to the South Milledge Avenue Site, would it not be affected by construction or operation of the NBAF at the South Milledge Avenue Site. The University of Georgia would arrange for an alternative for any temporary use at the South Milledge Avenue Site if construction of the NBAF at the site is selected.

Comment No: 3  Issue Code: 13.2
DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden and potential effects on wildlife. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and Whitehall Forest. Security requirements at the proposed NBAF would require continuous outdoor nighttime lighting. Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. Mitigation measures, such as the use of shielded lighting, will be considered in the final design of the NBAF. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. However, the use of shielded lighting would minimize the potential for impacts in adjacent habitats. Given the relatively low profile of the building and the use of mitigative measures, significant lighting impacts on migratory birds would not be likely to occur.

The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9 of the NBAF EIS. Although the NBAF EIS acknowledges the potential for significant wildlife impacts in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could...
prevent adverse impacts from a foreign introduction.

Comment No: 4                     Issue Code: 17.2
DHS notes the commentor’s concerns regarding the handling and transport of packages containing pathogens. The general regulations governing the required NBAF 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. More detailed information on the regulatory requirements, packaging / handling procedures, documentation / labeling procedures, and notification requirements for the transport of pathogens is provided in Section 2.2.2.3 of the NBAF EIS. 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 South Milledge Avenue Site is provided in Section 3.11.3 of the NBAF EIS. With regard to the specific routes for 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.
DHS notes the commentor’s concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature including at night due to lighting and would alter the viewshed of the area. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigative measures, such as shielded lighting, will be considered in the final design of the NBAF.

If the Dept. of Homeland Security persists in pursuing this location, I am aware of the potential for numerous lawsuits that will challenge such a decision in various courts of law.

Sincerely,

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

DHS notes the information provided by the commentor.

I am a rancher with substantial land and cattle within the vicinity of Manhattan. I also serve in the Kansas House of Representatives the people of Morris and Dickinson Counties. I find the NBAF facility to be a valuable one for Kansas and Midwest livestock producers. There is no better location in this nation given the proximity to the University, other bioresearch groups and the importance of the livestock industry to the region.

It is not without some caution that a facility of this kind be located in the region but I have come down on the side of support. The advantages to having a facility nearby far outweigh any risk.

I also note almost no opposition among my 23,000 constituents in adjoining counties.

I strongly encourage your selection of Manhattan, Kansas.

Tom Moxley

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

Comment No: 2  
Issue Code: 21.4  
DHS notes the commentor's concern regarding the NBAF. The purpose and need for the proposed action is discussed in Chapter 1 of the NBAF EIS. DHS can not guarantee that the NBAF would never experience an accident. However, as discussed in Section 2.2.1.1, modern biosafety design substantially diminishes the chances of a release as the primary design goal is to provide an adequate level of redundant safety and biocontainment that would be integrated into every component of the building. A discussion of human health and safety is included in Section 3.14.

Comment No: 3  
Issue Code: 5.0  
DHS notes the commentor'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 sububan or semi-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 4  
Issue Code: 24.1  
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative and support for the Plum Island Site Alternative.

August 25, 2008

Good morning.

My name is Dan Mulhern. I live in Kansas with my wife Terry and my son Ben.

I am deeply concerned about the location, the proposed location, of the NBAF facility in Manhattan, just a couple of miles from my house. I'm concerned about the security measures that may or may not be employed at that location, realizing the potential for both intentional and accidental human error.

I strongly urge Homeland Security not locate this facility in Manhattan, Kansas or any other occupied area of the country, but put it back on Plum Island where it has a better chance of being a secure facility, posing less risk to human health and livestock health.

Again, I am strongly opposed to the location of this facility in Manhattan, Kansas and I urgently request that you please consider putting it somewhere else, preferably well away from any human habitation.

Thank you very much.
DHS notes the commentor's opposition to the five mainland site alternatives.

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

DHS notes the commentor's opposition to the five mainland site alternatives in favor of upgrading the Plum Island facility. Upgrading the existing facility was considered but dismissed as a reasonable alternative based on its age, its inability to support a BSL-4 laboratory and animal space, and cost as discussed in Section 2.4.1 of the NBAF EIS. Siting the proposed NBAF on Plum Island is one of the six action alternatives under consideration.

I am appalled that anyone would consider moving the research from Plum Island to the mainland. Just because someone was stupid enough to authorize the study of mainland locations does not mean we should compound that stupidity by going ahead with a mainland location!!

Beef up the facility on Plum Island. All this nickle and dime discussion is going to look like just that if anything should escape from a mainland lab and don't say it can't or won't happen... it sure can. I urge anyone in Washington DC with a brain to go against any idea of moving this research off Plum Island...

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

DHS notes the commentor's statement.

From: Dennis Munin
Sent: Friday, August 22, 2008 11:09 AM
To: NBAFProgramManager

Subject: Support of the Manhattan KS site

I would like to write in support of you choosing Manhattan, KS, as the site of the NBAF facility. Manhattan is the perfect location for this new operation. We already have a class 3 facility which could assist and allow for a quicker startup on this very worthwhile project. There probably isn’t a more suited location to work on animal diseases then not only the heartland of America, but also in the middle of some of the best animal research done anywhere in the world.

In addition, Manhattan is a great community to live and raise a family. It offers so much more than a community its size normally would. With Ft. Riley next door and Kansas State University not only the diversification but the cultural pluses abound. The community as a whole with exception of a very small anti-group is not only supportive but excited about this facility being built here.

Please select Manhattan, Kansas, as your choice in this very difficult decision.

Dennis A. Munin

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Munson, Charles and David

Page 1 of 3

Munson Angus Farms, LLC.

4820 Liberty Hall Road
Junction City, KS 66441
785-338-8068

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

Dear James Johnson

We are opposed to the NBAF lab being located in Manhattan, KS and we certainly believe that there are better alternate locations. We are fourth and fifth generation ranchers who have the nucleus of our 200 head cowherd located five miles south of Manhattan. Our purebred Angus herd was started in 1924 and has been continually improved since then to produce the finest quality Angus beef. We now have our own retail beef store where we market our Munson Premium Angus Beef direct to the public.

Any outbreak of FMD from the Manhattan facility would completely bankrupt our family cattle and beef business which we have worked for 4 generations to establish.

Locating this type of research in the heart of cattle country makes absolutely no sense. Estimated costs of a FMD outbreak from the Manhattan site as published in the NBAF Draft Environmental Impact Statement is 4.1 billion dollars, the highest of any proposed site. We don’t test our nuclear bombs and military weapons in populated areas, so why purposely bring the highly dangerous virus into the center of cattle country.

If this lab is located in Manhattan, Kansas you are playing Russian roulette with the Kansas and Midwest cattle industry. The gun aimed toward the feedlots of Kansas

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

Comment No: 2 Issue Code: 21.4
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 commenter’s concern for security of the NBAF. Regardless of location, the NBAF would have the levels of protection and control required by applicable DHS security directives. A Threat and Risk Assessment (designated as For Official Use Only) was prepared that evaluated site-specific security issues and will be considered in the decision making process on whether or not the NBAF is built, and, if so, where.
Comment No: 3                     Issue Code: 11.4

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

DHS notes the commentor’s concern regarding potential tornado impacts to the NBAF. The NBAF would be designed to withstand the normal meteorological conditions that are present within the geographic area of the selected site. The basis for establishing the anticipated wind speeds were the International Building Code, ASCE 7 and the local jurisdictions. However, because of code specified building importance modification factors and normal factors of safety incorporated into the structural design, the facility would resist wind pressures up to 170% of the code specified 50-year wind pressures. This means the building’s structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period.

In the unlikely event that a 500-year wind storm strikes the facility, the exterior walls and roofing of the building would likely fail first, and this breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building’s interior and exterior walls. The loss of these architectural wall components would decrease the overall wind loading applied to the building and therefore diminish the possibility of damage to the building’s primary structural system. Even with the failure of these interior and exterior wall systems under an extreme wind loading event, the robust construction used to construct BSL-3Ag and BSL-4 spaces, reinforced cast-in-place concrete walls, would resist these wind forces and the primary bio-containment envelope would not be breached. The containment walls will be designed to withstand a 200 mph wind load, which is equivalent to an F3 tornado according to the FEMA Design and Construction Guidance for Community Shelters standards.

Comment No: 4                     Issue Code: 2.0

DHS notes the commentor’s statement. Chapter 1, Section 1.1 of the NBAF EIS identifies DHS’s mission which is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal or benefit of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies.

Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, DHS cannot
guarantee that the NBAF would never experience an accident however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Section 3.10.9 and Appendix D of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.
Munson, Charles and David

Page 3 of 3

Comment No: 5                     Issue Code: 24.1
DHS notes the commentor's opposition to the five mainland site alternatives in favor of the Plum Island Site Alternative.

Comment No: 6                     Issue Code: 24.5
DHS notes the commentor's statement.

Munson Angus Farms, LLC.

4620 Liberty Hill Road
Junction City, KS 66441
785-238-8068

We believe that the most sensible solution is for this facility to remain on Plum Island because of its isolation from the mainland. Our 2nd choice would be Flora, Mississippi because the location is more remote with much lower concentrations of people and animals in the area.

We have friends in Manhattan who like to hunt and fish on our property. We will certainly not allow this to take place if this lab is in Manhattan. We also go to K-State for athletic events, to the Vet Hospital and to the campus for numerous events. If the lab is located in Manhattan, we will certainly curtail our participation because of the possibilities of NBAF employees being contaminated. For these reasons, we firmly believe that the risk greatly outweighs the reward of locating the NBAF in Manhattan, KS. We trust that common sense and good scientific judgment will prevail when making this very critical decision.

Sincerely,

Charles E. Munson
Munson Angus Farms, LLC

David C. Munson
Munson Angus Farms, LLC