

**Murch, Arvin**

**Page 1 of 1**

WD0803

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**From:** ARVIN MURCH [REDACTED]  
**Sent:** Monday, August 25, 2008 5:11 PM  
**To:** NBAFProgramManager  
**Subject:** Proposed expansion of Plum Island Animal Disease Center

Dear Sirs,

1| 5.1 I would like to register my opposition to the proposed expansion of the Plum Island Animal Disease Center to include diseases that can move from animals to humans. The fact that this step is being considered for a facility located in the heart of the metropolitan New York area and central to one of the most densely populated regions of the country frankly astonishes me. I can think of no worse display of judgment and common sense than this plan, and I am not at all reassured by the claim that this new facility " would have the latest advances in security and technology" given the dubious track record of Plum Island and other nearby facilities. I strongly urge the Department of Homeland Security and other agencies involved to reject this monstrous proposal.

Arvin W. Murch  
[REDACTED] CT

Comment No: 1                      Issue Code: 5.1  
DHS notes the commentor's opposition to the Plum Island Site Alternative.

**Murphy, Bonnie Barnett**

Page 1 of 1

WD0436

**From:** Bonnie Barnett Murphy [REDACTED]  
**Sent:** Wednesday, August 20, 2008 9:04 PM  
**To:** NBAFProgramManager  
**Subject:** Bio Lab

1 | 25.3 | I am very concerned that you would consider putting this Agro Bio Lab in such a populated area in Butner, North Carolina. I am against this.

2 | 5.3 | It needs to be built in an unpopulated area. The citizens of Granville County are against this, my family and I are against it.

1 cont. |  
25.3 |

Bonnie  
Barnett  
Murphy

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California and North Carolina

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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: 5.3

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.

## Murphy, Charles

## Page 1 of 1

WD0293

**From:** Chuck Murphy [REDACTED]  
**Sent:** Friday, August 15, 2008 5:58 PM  
**To:** NBAFProgramManager  
**Subject:** Comments from a pro-NBAF Athens resident

Dear NBAF Program Manager,

First, I would like to thank you for providing a very open, methodical and transparent process for determining the location of the NBAF. I have been following the process for approximately the last year, and I think you have done everything possible to ensure that all factors are considered before selecting the best location.

I have been to the local meetings on NBAF and I have done extensive reading on the subject (including buying and reading the "Lab 257" book on the history of the Plum Island facility), so I feel I'm reasonably well-informed on the pros and cons of the project.

1|24.2 Initially, I had reservations about living near the proposed facility, but after studying all the available materials, I'm now convinced that there is no significant risk to our community. I now feel that the pros far outweigh the cons, and I think that Athens would be an excellent location for this facility.

2|15.2 The main reason that I'm writing to you is to let you know that despite the presence of a small but very vocal minority in this community, I think that there is a large "silent majority" of residents like me who have no safety concerns about locating the facility in our community, and would really welcome the economic benefits it would bring.

Best wishes for the ongoing success of your project. I look forward to meeting you at the grand opening of NBAF in Athens!

Chuck Murphy  
 [REDACTED] Georgia

Comment No: 1                      Issue Code: 24.2

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

Comment No: 2                      Issue Code: 15.2

DHS notes the commentor's statement.

Murphy, Jr., Robert

Page 1 of 1

WD0176

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**From:** ROBERT F. MURPHY JR [REDACTED]  
**Sent:** Tuesday, August 05, 2008 8:49 AM  
**To:** NBAFProgramManager; [REDACTED]  
**Cc:** Boyda  
**Subject:** NBAF

1|2.0 | The reason this was built on an island in the first place was to protect the public.  
You really don't think we trust these people with what is germ warfare ammunition in our  
home town do you?  
Didn't we just declare war on a country when we thought that they might have these capabilities?

Comment No: 1      Issue Code: 2.0

DHS notes the commentor's lack of confidence in the DHS. The NBAF's mission is defensive and would not involve offensive bioweapons research or development. The international treaty, known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. 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.

Murray, Catharine

Page 1 of 1

WD0069

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**From:** Chatham Murray [REDACTED]  
**Sent:** Thursday, July 10, 2008 5:00 PM  
**To:** NBAFProgramManager  
**Subject:** NBFA

1) 25.2 | We do not want Homeland Security or NBFA in the smallest county in our  
2) 24.1 | state, the highly populated, beautiful college town of Athens, GA.  
3) 5.0 | Take your work elsewhere or leave it on Plum Island. You are not  
welcome here. Catharine C. Murray

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: 24.1  
DHS notes the commentor's statement. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated in populated areas such as Athens. An example is the Centers for Disease Control and Prevention located in downtown Atlanta.

Comment No: 3                      Issue Code: 5.0  
DHS notes the commentor's statement.

Myers, Scott

Page 1 of 1

WD0107

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**From:** Scott Myers [REDACTED]  
**Sent:** Friday, July 25, 2008 9:22 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Butner,NC

1|25.3 | **I live in [REDACTED] NC and I do not want the NBAF anywhere in NC. It is too dangerous and I don' trust DHS to properly secure it. Put it in the desert near Area 51**

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

**Nall, Michael****Page 1 of 1**

PD0254

August 24, 2008

Yes. This is Michael Nall of [REDACTED] Illinois - [REDACTED]  
Illinois [REDACTED] Phone number is [REDACTED]

1| 24.1 I am an independent cattle producer – cow/calf feeder operation of about eighty head. I  
2| 5.0 feel like there was a reason this research was put on an island in New York and I think it  
ought to stay there. I do not think this needs to be right in the middle of the heartland. I  
can just see all kinds of possible disasters if anything would get away.

3| 25.4 So this is my comment. I am very much against this. I have a daughter going to school  
at K-State. I don't want to have to soak my shoes and leave them whenever I leave out  
there.

So, you can give me a call back or send me more information.

Thank you.

Good bye.

Comment No: 1                      Issue Code: 24.1

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative and support for the Plum Island Site Alternative.

Comment No: 2                      Issue Code: 5.0

DHS notes the commentor'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.

Comment No: 3                      Issue Code: 25.4

DHS notes the commentor's statement.

Napoli, PhD, Joanne

Page 1 of 1

WD0100

**From:** Joanne [REDACTED]  
**Sent:** Wednesday, July 23, 2008 7:15 PM  
**To:** NBAFProgramManager  
**Subject:** no to bio lab

1| 25.3 | Dear Sir or Madame,  
 2| 12.3 | Please exert your influence to stop the bio-lab in the Butner area. It is a danger to everyone in the area, including all  
 3| 19.3 | those who get their drinking water from nearby sources. Waste from the bio lab could endanger animals, people and  
 4| 18.3 | the entire environment if left to human error when disposing wastes from contaminated animals.  
 Such a lab should be contained on an island far away from people.

Sincerely,  
 Joanne Napoli, Ph.D.  
 George Oberlander, Ph.D.

-----  
 Joanne Napoli, Ph.D.

[REDACTED]  
 [REDACTED] North Carolina  
 Phone: [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: 12.3

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. The capacity to supply needed water is available with either existing or planned capacity, although some infrastructure improvements may be required.

Comment No: 3                      Issue Code: 19.3

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: 4                      Issue Code: 18.3

DHS notes the commentor's concern. As discussed in Section 3.13.2.2 of the NBAF EIS, one type of animal waste, i.e., biological liquid waste from BSL-3 Ag areas, will enter a dedicated treatment system that involves thermal treatment followed by subsequent decontamination prior to discharge to a wastewater treatment system. A comparison of some of the onsite pretreatment technologies being considered for another type of animal waste, infected animal carcasses, is presented on Table 3.13.2.2-4. As shown on the table, all of these technologies result in non-infective residuals. Further, Section 3.13.2.2 explains that all of the thermal, disinfection, and decontamination technologies used to treat any type of animal waste generated at the NBAF will meet the operational and validation criteria recommended in "Biosafety in Microbiological and Biomedical Laboratories" to ensure effective treatment. Further, as discussed in Section 2.2.2 of the NBAF EIS, operational training and the use of standard protocols and SOPs would help to reduce the type of human error that could pose a threat to health and safety.

Naybor, A

Page 1 of 1

NCD019

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

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

Name: A. Naybor  
 Title: \_\_\_\_\_  
 Organization: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: [REDACTED] State: NC Zip Code: \_\_\_\_\_  
 Comments: \_\_\_\_\_

1125.3 | I came here from Raleigh, 40 minutes away. I agree with all of those who have spoken out tonight. Every one of those folks either opposed the lab, or raised serious concerns, or both. No one has supported the lab tonight. Most are from the immediately surrounding area, but I want you to know the opposition extends to Raleigh and well beyond. This is not the place for the NBAF - the community does not want it.

(Continued on back for your convenience)

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

Neel, Kelly

Page 1 of 1

WD0335

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**From:** Kelly Neel [REDACTED]  
**Sent:** Monday, August 18, 2008 5:40 PM  
**To:** NBAFProgramManager  
**Subject:** Manhattan Kansas plant

1|25.4 | To whom it may concern - I am a citizen and business owner in [REDACTED] Kansas and would like to express my concern about the proposed plant in our area. I am 100% against this facility and would like my position to be documented. Thanks for your time.

Sincerely,  
Kelly Neel

[REDACTED]  
[REDACTED] KS [REDACTED]  
[REDACTED]

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

Neely, Beth

Page 1 of 2

03/21/2008 THU 14:24 [REDACTED] 001/002

[REDACTED] FD0035

# Fax

**To:** James V. Johnson      **From:** Beth B. Neely

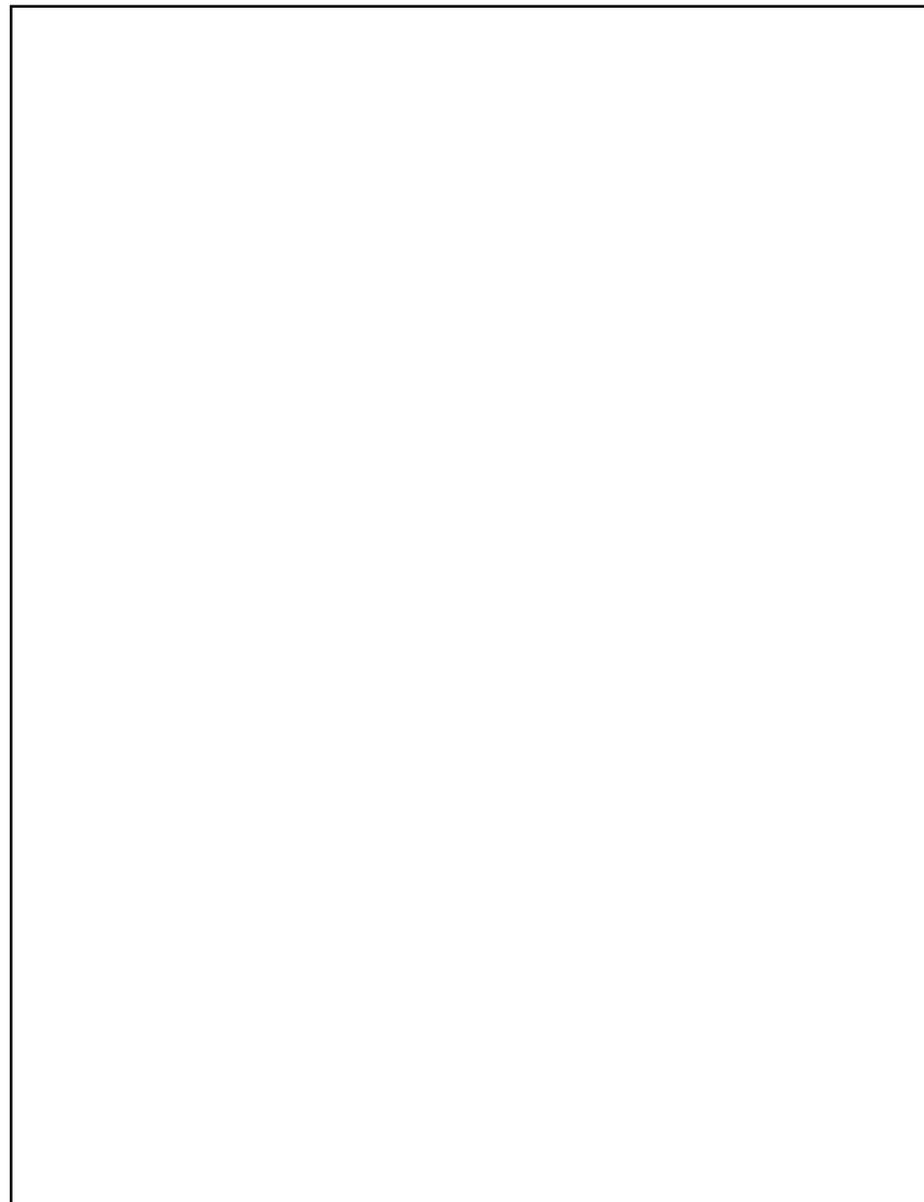
**Fax:** 1-866-508-6223      **Date:** August 21, 2008

**Phone:** 1-866-501-6223      **Pages:** 2 (including cover sheet)

**Re:** NBAF in Flora, Mississippi      **CC:**

Urgent    For Review    Please Comment    Please Reply    Please Recycle

**Comments:** Letter of support for NBAF locating in Flora, Mississippi is attached.



Neely, Beth

Page 2 of 2

08/21/2008 THU 14:24 [REDACTED] 0012/002  
FD0035

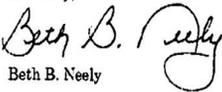
August 21, 2008

Beth B. Neely  
[REDACTED]  
[REDACTED] Mississippi [REDACTED]

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 Mr. Johnson:

1|24.5 I am writing in support of the National Bio and Agro-Defense Facility (NBAF) locating in Flora, Mississippi. I understand that Mississippi is now one of six final sites to be the home to NBAF. Economic growth would begin at Flora then spread to surrounding cities in central Mississippi as suppliers and other supporting manufacturers are attracted to the area. In addition, new housing developments could be created in neighboring communities and towns as employers, workers and their families choose avoid a long commute. I hope that you will follow Nissan, Toyota, Northrop Grumman, Raytheon, SeverCorr, etc. by entrusting the growth and success of your Facility to the State of Mississippi.

Sincerely,  
  
Beth B. Neely

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

Nelson, Mary

Page 1 of 1

WD0113

**From:** Mary Nelson [REDACTED]  
**Sent:** Friday, July 25, 2008 11:31 PM  
**To:** NBAFProgramManager  
**Subject:** do NOT put this in Manhattan Kansas

- 1| 25.4 | This facility does NOT belong in Manhattan Kansas.  
 I have lived here all my life and am scared out of my mind about this being located here.  
 2| 24.1 | It belongs on Plum Island where it is isolated; Not in the middle of the country! There is  
 3| 5.0 | no reason that it belongs in Manhattan Kansas. There is no amount of money or  
 contribution to the economy that can support the dangers this poses.  
 Our local governments only think of trying to make a name for themselves to bring this  
 locally and not of the effect it poses. This is not a game ... or a test ... this is LIFE!!!!  
 4| 5.1 | Our Lives in Manhattan Kansas!  
 Spend the money and upgrade the Plum Island location.
- 1cont.| 25.4 | **Please Please Please** do not locate this here.  
 Mary Nelson

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 24.1

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

Comment No: 3                      Issue Code: 5.0

DHS notes the commentor's statement. As described in Section 2.3.1 of the NBAF EIS, 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 semi-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the U.S. 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: 5.1

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

Nelson, Mary

Page 1 of 1

WD0637

**From:** Mary Nelson [REDACTED]  
**Sent:** Friday, August 22, 2008 9:39 PM  
**To:** NBAFProgramManager  
**Subject:** NO to NBAF in Manhattan Kansas

1|25.4; 2|24.1 Please do NOT put this facility in Manhattan Kansas. It belongs on Plum Island. Our local and state government is pressing to have this facility in Manhattan Kansas, as they are thinking only about what money can be brought to the state, but there is absolutely NO amount of money or revenue worth the possible disastrous outcome that could come from this. Human error would be devastating to us. A possible breach is almost certain. This is putting terrorists at our door. We have lived here all our life, and wish to do so. This is OUR home. We do NOT want this facility here.

3|15.4 Our university, local and state personnel pushing this haven't made Manhattan Kansas home all of their life and only move here for a job, and then on to the better jobs, whereas we are here to stay, so their voice in this matter is not from the heart as ours is. We do not wish to live in constant fear that someone or something will mess up and put us at risk. PLEASE PLEASE PLEASE do the right thing and NOT locate this in Manhattan Kansas, but put this on Plum Island. It truly is the only answer. The research likely does need to be done. Just NOT in Manhattan Kansas. I pray you will make the only practical choice, and that is Plum Island.

4|21.4; 1Cont.1|25.4  
5|8.4  
1Cont.1|25.4; 2Cont.1|24.1  
Mary Nelson

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 24.1

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

Comment No: 3                      Issue Code: 15.4

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

Comment No: 4                      Issue Code: 21.4

DHS notes the commentor'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: 5                      Issue Code: 8.4

DHS notes the commentor's statement.

Nelson, William

Page 1 of 1

WD0472

**From:** Bill Nelson [REDACTED]  
**Sent:** Friday, August 22, 2008 10:05 AM  
**To:** NBAFProgramManager  
**Subject:** Don't Build in Athens, GA

- 1| 25.2 | As a resident of [REDACTED] I'm opposed to the construction of the NBAF site here.
- 2| 21.2 | The full scope of vulnerable risks in having such a devastating facility within a residential community removes Athens, Georgia as an acceptable location.
- 1 cont. | The ever-changing information from NBAF administrators regarding the total cost, certainty of safety from contamination and disease transmission, and daily water consumption has corrupted the arguments of  
25.2 | proponents in favor of this facility.

Thank you for the opportunity to state my position,  
 William F. Nelson  
 [REDACTED] GA

Comment No: 1                      Issue Code: 25.2

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

Comment No: 2                      Issue Code: 21.2

DHS notes the commentor's concern regarding the safe operation of the NBAF. 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. The risk of an accidental release of a pathogen is extremely low.

Newborg, Roxana Bertovich and John

Page 1 of 2



NCD002

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

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

Name: Roxana Bertovich [Redacted]

Title: Home/Land owner

Organization: AT&T Net. Ann.

Address: [Redacted] 2 mi. from proposed site

City: [Redacted] State: NE Zip Code: [Redacted]

Comments: Why are all the possible sites in very populated areas?  
The Botnet area is home to many horse and cattle farms - what kind of compensation will be given when a leak happens??  
The area is home to many protected birds of prey - what will be done when one mouse gets into then back out of the LAB. these birds will then eat it and spread the bird flu???  
Will the stem and Botnet Fire Dept's be funded by the Gov't for equipment and training  
Level of facility is for bio weapons first the side by product is vaccines.  
Why build new when closed military sites could be retrofit.

(Continued on back for your convenience)

NATIONAL BIO AND AGRO-DEFENSE FACILITY  
Office of National Laboratories  
Director  
221.3  
2 cont. 21.3  
and Techn  
312.0  
Sci  
1 cont. 5.0

Comment No: 1

Issue Code: 5.0

DHS notes the commentor's question. 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.

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.

Comment No: 2

Issue Code: 21.3

DHS notes the commentor's concern about apportionment of financial liability for medical treatment in the event of a pathogen release. However, it is not possible to determine in advance who might be responsible for an incident. DHS will follow applicable local, state, and federal law, whether in asserting or defending against a claim for damages should a pathogen be released from the NBAF.

Comment No: 3

Issue Code: 2.0

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.

Newborg, Roxana Bertovich and John

Page 2 of 2

NCD002

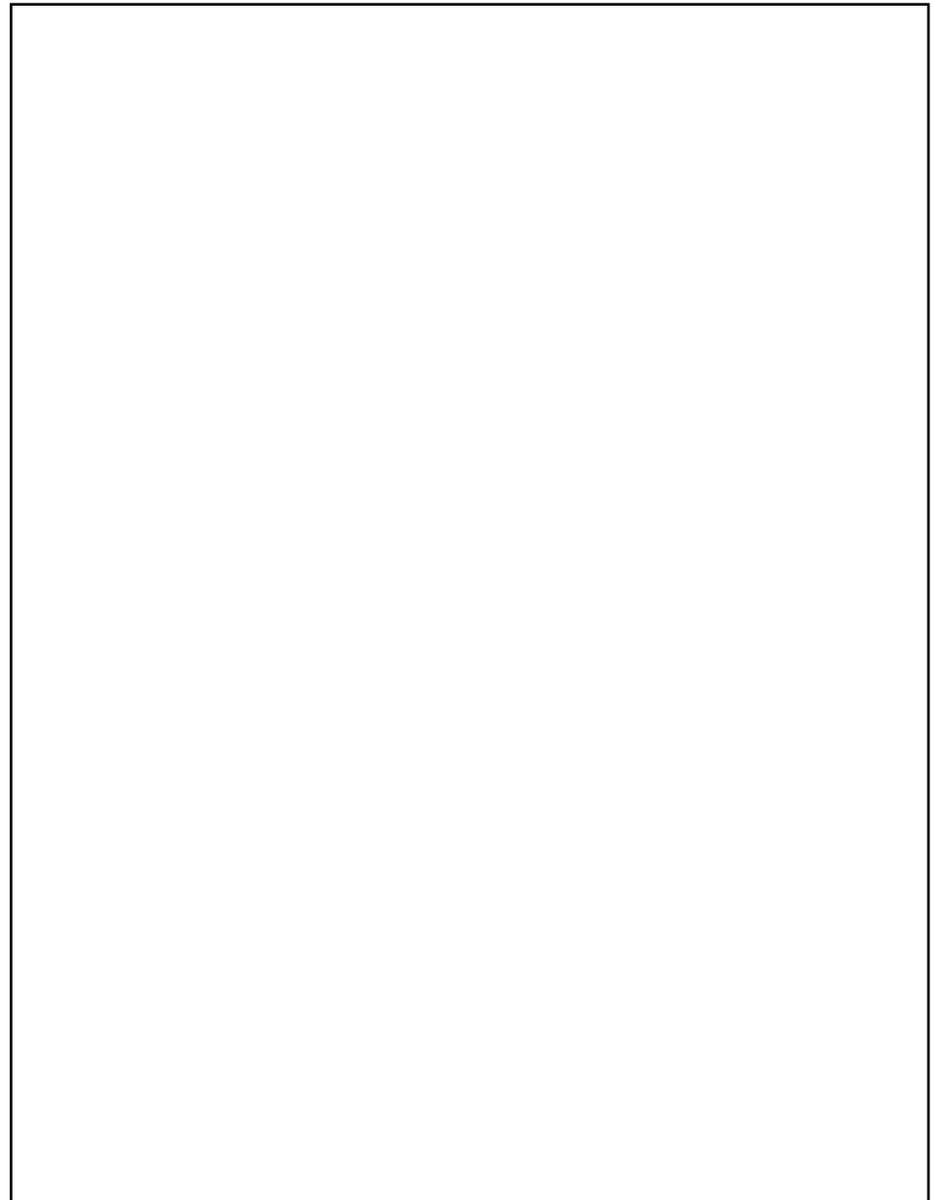
1 cont.  
5.0

Why not put it out in the desert  
Area where we did Nuclear Bomb testing  
The proposed site is right next door to  
A military facility that has "Live" munitions  
shot off. Accidents do happen.

**THANK YOU FOR YOUR COMMENTS**

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

<b>U.S. MAIL</b>	<b>TOLL-FREE FAX</b>
U.S. Department of Homeland Security Science and Technology Directorate James V. Johnson Mail Stop #2100 245 Murray Lane, SW Building 410 Washington, DC 20528	1-866-508-NBAF (6223)



Newcomb, NCC, LPC, Thistle

Page 1 of 1

WD0856

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**From:** Jeremy Newcomb [REDACTED]  
**Sent:** Monday, August 25, 2008 9:24 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF

1|5.4 [REDACTED] KS has been my hometown since 1978. It would be devastating to the people,  
community, and agriculture to bring the NBAF to this area. Keep the facility on Plum Island,  
2|5.1 NY where it has been self contained and safe to the human population. Renovate it as needed  
but please do not contaminate our heartland.

Sincerely,  
Ms. Thistle Newcomb, NCC, LPC

Comment No: 1                      Issue Code: 5.4

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

Comment No: 2                      Issue Code: 5.1

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

Newkirk, Mary

Page 1 of 1

WD0158

**From:** Richard Newkirk [REDACTED]  
**Sent:** Friday, August 01, 2008 6:47 PM  
**To:** NBAFProgramManager  
**Subject:** Manhattan site

Ladies and Gentlemen,

I attended most of the evening session at the K-State Union last evening. I listened with an open mind trying to assess the benefits vs. possible environmental impact for our possible site. I must say that I was most affected by the local ranchers that spoke. I believe that though there seems to be a very small potential hazard, in reality a rumor of a breach could be nearly as detrimental as an actual incident. The heart of cattle country does not appear to be a reasonable location for this facility.

- 1| 21.4 | Please keep it on Plum Island. Our additional tax dollars needed to build a new facility are not in the  
 2| 24.1 | same ballpark as the potential loss if something happened in this part of the country to place doubt in the  
 3| 15.4 | minds of the world that our agriculture products are tainted.

Thank you.  
 Mary Newkirk

Comment No: 1      Issue Code: 21.4

DHS notes commentor's concerns.

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: 2      Issue Code: 24.1

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

Comment No: 3      Issue Code: 15.4

DHS notes the commentor's concern. The potential effects to livestock-related industries is discussed in Section 3.10. 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. The risk of a pathogen release from the proposed NBAF at each of the proposed sites was evaluated in Section 3.14 of the NBAF DEIS and was determined to be low for all sites.

Newsome, Robert

Page 1 of 1

06-07-08:11:43AM:115 N. 4th St. - 3rd Floor :785 565 6847 # 1 / 1

FD0008



**BOARD OF COMMISSIONERS**

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August 7, 2008

DHS Science and Technology Directorate  
James Johnson  
245 Murray Lane SW, Bldg 410  
Washington, DC 20528

RE: NBAF

Dear Mr. Johnson:

I was jointly employed 43 years in Research-Extension, Kansas State University and the Kansas Department of Agriculture. This permitted me to meet and develop friendships with business, agricultural, and governmental leaders in the 105 counties of Kansas.

I can assure you that leaders in all 105 counties are in support of NBAF being located at Kansas State University.

Sincerely,  


Dr. Robert W. Newsome, Chairman  
Board of Riley County Commissioners  
Professor-Emeritus

Comment No: 1      Issue Code: 24.4

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

Nigro, Laura

Page 1 of 1

WD0569

From: LJ LJ [REDACTED]  
 Sent: Sunday, August 24, 2008 4:36 PM  
 To: NBAFProgramManager  
 Subject: NO to NBAF in Butner, NC

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

Dear Mr. Johnson,

1| 25.3 | As a former research scientist living near Butner, I urge you to reject this site for the National Bio and Agro Defense Facility.

Almost four years ago I relocated to this area in order to support multi-disciplinary science education and R&D. I performed this function as an employee of Sigma Xi, The Scientific Research Society, headquartered in Research Triangle Park. Sigma Xi's mission is to enhance the health of the research enterprise, foster integrity in science and engineering, and promote the public's understanding of science for the purpose of improving the human condition. While no longer on staff of the Society, I remain an active elected associate member of Sigma Xi and an enthusiastic proponent of its over-arching pro-science mission.

On two separate occasions earlier this month, I heard the Durham Environmental Affairs Board (EAB) present its findings on the proposed siting of NBAF in Butner. The first occasion was at Durham City Hall, addressed to the general public. The second was at the Durham County Government Administrative Complex, addressed to the Durham County Commissioners. In addition to hearing the EAB present its report, I also heard the ensuing public comments from audience members. Their combined concerns included the risk to our water supplies, the vulnerability of confined populations, and the exposure of both people and livestock to deadly pathogens.

2| 12.3  
 3| 15.3  
 4| 19.3, 5| 13.3

1 cont.| 25.3 | Based on the testimony at these two forums and on my independent reading about this issue, I vigorously and unequivocally oppose siting NBAF in Butner. The clarion voices of opposition and even alarm from private residents, elected officials, public health/safety managers, municipal emergency responders, medical and veterinary experts, and government accountability boards ring too loud and clear to choose otherwise.

Thank you for your consideration.

Sincerely,

Laura J. "LJ" Nigro, M.S. Physics

[REDACTED]  
 [REDACTED] NC [REDACTED]  
 [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: 12.3

DHS notes the commentor's concerns and acknowledges the current regional drought conditions. 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. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects. Section 3.10.7.1.3 describes local response capabilities and Section 3.14.4.5 describes an accidental release's site specific consequences.

Comment No: 3 Issue Code: 15.3

DHS notes the commentor's views on risk. 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 with a minimal degree of risk, regardless of the site chosen.

Comment No: 4 Issue Code: 19.3

See response to Comment No. 3.

Comment No: 5 Issue Code: 13.3

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 the NBAF.

Noble, C.E.

Page 1 of 1

WD0063

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**From:** susan noble [REDACTED]  
**Sent:** Saturday, July 12, 2008 4:44 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Athens, GA

Dear DHS:

1) 25.2 | We have read the DEIS and are extremely alarmed by the proposal of the NBAF possibly  
2) 21.2 | | relocating to Athens, Georgia. It seems to us that the possibility of an accident is always present  
3) 24.1 | | and the effect on our community would be disastrous. Please take the advice of the impact  
statement and keep the facility on Plum Island.

Sincerely,

Dr. and Mrs. C. E. Noble, [REDACTED] Georgia

Comment No: 1                      Issue Code: 25.2

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

Comment No: 2                      Issue Code: 21.2

DHS notes the commentor's concern 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: 24.1

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

Noble, Susan

Page 1 of 1

WD0050

**From:** susan noble [REDACTED]  
**Sent:** Thursday, July 10, 2008 12:52 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Athens, GA

Sir/Ma'am:

1|25.2; I am writing to let you know I am extremely opposed to the proposed relocation to Athens,  
 2|12.2; Georgia. I live only 1/2 mile away from the site and am a frequent visitor to the adjacent  
 3|21.2 impacted Botanical Garden. This facility is too dangerous to be located close to our  
 neighborhoods and agricultural areas and will be a huge drain on our water sources--we are in a  
drought and are also subject to tornados. It would be a danger to all our animals, domestic,  
agricultural, and wild, and to anyone in contact with them.

4|5.0 Furthermore, I do not believe that this facility should be relocated onto the mainland at all, but  
 should either remain on Plum Island or be located in a totally isolated desert area where it  
 reduces the impact and potential danger to animals, vegetation and humans.

I hope that you will take these critical issues into consideration.

Sincerely, Susan Noble

Comment No: 1                      Issue Code: 25.2

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

Comment No: 2                      Issue Code: 12.2

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

Comment No: 3                      Issue Code: 21.2

DHS notes the commentor's views on risk. 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 with a minimal degree of risk, regardless of the site chosen.

Comment No: 4                      Issue Code: 5.0

DHS notes the commentor's concern. 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. 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 Expression of Interest (EOI).

Noel, Kathrine

Page 1 of 1

WD0228

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**From:** enonfarm [REDACTED]  
**Sent:** Monday, August 11, 2008 9:27 AM  
**To:** NBAFProgramManager  
**Subject:** comments on site in Butner

I'll follow the format of the comment sheets distributed in Butner:

Name: Kathrine Noel  
Address: [REDACTED]  
[REDACTED] N.C. [REDACTED]

Comments:

1|24.3 | I live about 10 miles or less from the proposed site, raise beef cows, and am in favor of locating the NBAF at the Butner site. I feel that this is vital research that must be done, and Butner is an appropriate placement for this facility. I realize that there are risks involved, but with the safety measures outlined at the meeting in Butner sound extremely reasonable and well thought out.

2|21.3 | As I am sure you are aware, many of the detractors are not from our county. In addition to that, the group that is most loudly in opposition to the facility is a group that is against pretty much anything that is offered. I believe that most of these people are well-intentioned folks who simply believe what their friends tell them.

1 cont. | I must personally apologize for the extremely rude behavior of many of the speakers at the hearing in Butner. Those people do not represent most of the people in our wonderful county. I hope that the rantings of a few people do not harm our chance of hosting this facility in the county.  
24.3

Thank-you for the opportunity to have input into this process.

Kathrine Noel, R.N.

Comment No: 1                      Issue Code: 24.3

DHS notes the commentor's support for the Umstead Research Farm Site Alternative.

Comment No: 2                      Issue Code: 21.3

DHS Notes the commentor's statement.

Norden, Melanie

Page 1 of 7

WD0500

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**From:** mel [REDACTED]  
**Sent:** Friday, August 22, 2008 1:45 PM  
**To:** NBAFProgramManager  
**Attachments:** PLUM ISLAND ORAL COMMENTS 8-12.doc

Attached please find my comments relative to siting the NBAF on Plum Island.

Melanie

Norden, Melanie

Page 2 of 7

WD0500

I am a resident of [REDACTED] New York.

1|3.0

In 2006, Congress appropriated money for site selection and other pre-construction activities for the NBAF. DHS developed a site selection process because Congress did not designate a specific site upon which to construct the NBAF.

DHS implemented a rigorous process for first, second and third round evaluation, with committees comprised of federal employees who evaluated the strengths, weaknesses, and deficiencies of possible sites against the original 4 criteria --- insufficient community support being one of them.

2|4.1

Federal teams then conducted site visits. Although not part of the competitive site selection process, Plum Island quote "meets the NEPA definition of reasonable alternative."

By whom? Plum Island was never part of the Site selection process but was tacked on later, meaning that the site selection committees never discussed Plum Island as a potential BLS-4 site. Did Congressional pressure, or other political concerns, play a role in Plum Island being added to the list?

If not, why was it? The National Environmental Policy Act has many requirements and *does* indicate that "reasonable alternatives" need to be investigated, but there are somewhere around 277 other BLS-3 labs and 12 or more BLS-4 labs that might have been considered as potential sites. Why was Plum Island the only one added to the list?

As residents of the North Fork we strongly request the original site selection committee be re-convened and a thorough analysis be done by that committee, not just by the DHS, of the suitability of Plum Island for an upgrade to BLS-4. We would like the Committee to undertake the same due diligence it exercised in examining the final proposed five sites, otherwise we, as residents of New York State, have not been treated fairly and equally by the Federal government, with respect to this process.

1 cont. |  
3.0

In short, we request that Plum Island be vetted *in exactly the same way, by the same people* that the other sites were.

3|21.1

Beyond, however, the concerns many of us share regarding the site selection process or, in our case, the lack thereof, we have persistent and serious concerns regarding safety and security at Plum Island --- concerns that are shared by the U.S. Government's Accountability Office which has twice, in recent years, both 2003 and 2007, reported on security and safety issues there.

Though the DHS has indicated its intent to replace Plum Island with a new, modernized facility, that replacement may not occur until several years hence, if at all. In our view, the Island is today and will in the foreseeable future, be vulnerable to security breaches and pathogen theft because physical security arrangements are incomplete and limited.

Comment No: 1                      Issue Code: 3.0

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.

Comment No: 2                      Issue Code: 4.1

DHS notes the commenter'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: 3                      Issue Code: 21.1

DHS notes the commenter's views on risk. 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 with a minimal degree of risk, regardless of the site chosen. Appendix B to the NBAF EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Norden, Melanie

Page 3 of 7

WD0500

4| 8.1 | Moreover, we question whether the Island's obsolete infrastructure is adequate to support even a BLS-3 lab. Given the Island's history of incidents, we also question whether it will ever be able to adequately meet the level of security and safety required of a BLS-4.

Some of our concerns include

- 3 cont. |  
21.1 |
- the lack of a full time federal protective service presence on the Island
  - the fact that there is *not* a NO FLY ZONE over the island
  - that there is limited surveillance of the Island's periphery (the areas outside of the bio-containment and administrative buildings are surveilled by stationary closed-circuit television cameras which are insufficient)
  - that the island is easily accessible to the general public and that there are limited NO TRESSPASSING signs to advise the public that it is a government facility, so boaters and fisherman line its banks regularly
  - that Plum Island's fire brigade has limited hours of operation and that local fire departments and emergency personnel have not been adequately trained in specific procedures regarding handling of hazardous pathogens and materials, and are limited in their response capabilities if a full scale fire were to break out on Plum Island;
  - that background checks on students, foreign researchers, cleaning and maintenance personnel who have access to pathogens and work with or around infected animals are not routinely undertaken, or not done in all cases, and that those same students, foreign researchers and maintenance personnel are not required to follow strict decontamination procedures and are not fully escorted at all times, when and if they do so.

We also share with the GAO concerns regarding a lack of an incidence response plan for incidents exceeding Plum Island's security capabilities.

5| 19.1 | Some of us are also concerned about decontamination and remediation regarding *past* incidents at Plum Island, and are afraid that going forward the same lack of attention to critical issues may occur.

According to the Island's Operation Manager, Mr. Doug Port:

- 6| 18.1 |
- Though Lab 257 was closed nearly 8 years ago, to date it has only received a surface decontamination, why?
  - That only 9,000 of the 30,000 gallons of oil spilled several years ago have been remediated
  - That there are drainage pipes, not double-walled, on the Island, that are 54 years old, and that the monitoring and preventative maintenance of this pipe work is inadequate.

The 2007 incident at Pirbright in England, for example, demonstrated that beyond initial design and construction, on-going maintenance plays a critical role in ensuring that high-containment labs operate safely and securely, since cracked and leaky pipes at Pirbright

Comment No: 4      Issue Code: 8.1

DHS notes the commentor's concern regarding the adequacy of the utility infrastructure to support the NBAF operation at the Plum Island Site Alternative. Chapter 3, Section 3.3.6 of the NBAF EIS includes an assessment of the current infrastructure, a discussion of the potential effects from construction and operation of the NBAF, and the identification of any infrastructure improvements necessary to meet design criteria and insure safe operation. Should a site be selected for NBAF, any needed infrastructure improvements to ensure service reliability would be identified in accordance with the final facility design.

Comment No: 5      Issue Code: 19.1

Should a decision be made to construct NBAF and, if so, a site is selected, DHS would determine alternatives regarding the future of PIADC, encompassing its decommissioning, and for Plum Island and would perform a separate NEPA analysis at that time.

Comment No: 6      Issue Code: 18.1

DHS notes the commentor's concern about wastes at the Plum Island Site. Section 3.12 of the NBAF Draft EIS evaluates existing hazardous, toxic, or radiologic waste contamination at each of the candidate sites. The methodology used to perform the evaluations is described in Section 3.12.1 and Section 3.12.6 presents the Plum Island Site evaluation. Section 3.12.6 concludes that results of confirmatory sampling at several Plum Island Animal Disease Center (PIADC) remediation sites had to be evaluated to determine if construction of the NBAF at the Plum Island Site would have construction or operational impacts. DHS' consultants have since evaluated these confirmatory sampling results. In the NBAF Final EIS, Section 3.13.6. will be revised to state that building the NBAF at Plum Island Site would require that a detailed Health and Safety Plan and Soil Management Plan be developed prior to construction activities. The Health and Safety Plan would identify the risks associated with working at the site and establish proper procedures and protocols for workers at the site during construction. In addition, because of the potential to generate contaminated soil during excavation, a Soil Management Plan would be required to properly identify and dispose of contaminated material.

The sanitary waste discharged from the PIADC must meet limits in its State Pollutant Discharge Elimination System (SPDES) permit. The New York State Department of Environmental Conservation is responsible for monitoring compliance with PIADC SPDES permit requirements. As discussed in Section 3.13.7.3 of the NBAF EIS, the PIADC wastewater treatment plant may need to be expanded, or a new wastewater treatment plant may need to be built and permitted to accommodate proposed NBAF peak loads. Modification or expansion of the existing plant would result in a regulatory review of the adequacy of these SPDES permit limits. PIADC currently operates three incinerators. If the NBAF is built at any location, including the Plum Island location, waste solids would be treated and disposed as shown on Table 3.13.2.2-3. For example, waste solids including bedding, packaging, personal protective equipment, etc. would be sent to an offsite waste

management facility. This means that the PIADC incinerators could be closed and their permits could be canceled. PIADC's former waste management practices and violations of environmental regulations or permits are not within the scope of the NBAF EIS.

Comment No: 7                      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 provides detailed information on the safe 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 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.

DHS also notes the commentor's concern that site specific safety and security plans are not included in the NBAF EIS. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The analysis conducted in the NBAF EIS was based on conceptual design plans posted on the DHS website. More detailed design plans would be developed as the project moves into the final design phase. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific safety and security protocols and plans would be developed that would address the procedures for decontamination of vehicles operating within the NBAF. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF.

Norden, Melanie

Page 4 of 7

WD0500

were indicative of poor maintenance practice. It is believed that this, in turn, resulted in live FMD virus contamination, when soil, water or other material were contaminated by effluent from the treatment tank and then deposited on the adjacent road.

7| 17.1 | Could an incident like what happened at Pirbright, happen on Plum, with any virus, or pathogen, including FMD? Are measures currently taken to disinfect visiting vehicles?

6 cont.|  
18.1 | Some of us also are concerned about the "historic" landfills, dating back to the 1950's, which exist on Plum Island where, according to the EIS, medical, industrial, laboratory, and hazardous wastes and pesticides, among who knows what else, are buried. These landfills are decades old. When, if ever, will these landfills be remediated? Or will new construction simply be built on top of them?

8| 23.0 | Since some construction is taking place at Plum Island at present, and significant construction would take place if Plum Island were the chosen NBAF site, has DHS done a formalized assessment of construction worker risk?  
9| 19.1 |

10| 9.1 | We also query how the emissions and by-products generated from carcass sterilization and incineration are managed today, and would be in the future, with respect to the waste stream.

6 cont.|  
18.1 | Moreover, what agency monitors whether the treated sanitary waste discharged today on Plum Island, to say nothing of future waste from an NBAF, meets all discharge requirements, since most, if not all, is discharged from a single outflow into Plum Gut Harbor?

Were Plum Island chosen as the final site, operation of the NBAF would result in the generation of wastewater, waste solids, and medical, hazardous and industrial solid wastes. An estimated 63,000 gallons of pre-treated (who knows how efficiently) wastewater would be discharged to the municipal sewage system, a substantial increase from today's 17,000 or so gallons.

7 cont.|  
17.1 | One of the criteria explored by the site selection committees, and documented in the EIS, of which, again, Plum Island was not a site which the committee evaluated, was the ability of affected communities to evacuate in case of an emergency.

11| 19.0 | In a recent article in our local newspaper, the Suffolk Times, Mr. Verrico, of the DHS, indicated that the likelihood of having to evacuate is practically non-existent.

12| 15.1 | Though the DHS states that the risk of an accidental release of a pathogen is extremely low, the economic effect, on this area, which relies on the agricultural and tourism industries, to say nothing of the densely populated Northeast Boston -New York corridor, would be devastating.

3 cont.|  
21.1 | Siting the NBAF on Plum Island would mean the study and specimen storage of zoonotic agents and viruses that can affect humans as well as animals and for which there are no

Comment No: 8 Issue Code: 23.0

DHS notes the commentor's views on risk. 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 with a minimal degree of risk, regardless of the site chosen.

Comment No: 9 Issue Code: 19.1

See Comment No. 8.

Comment No: 10 Issue Code: 9.1

DHS notes the commentor's concern about animal carcass disposal. Section 3.13 of the NBAF EIS explains that a number of different technologies including incineration, alkaline hydrolysis, and rendering are being considered for disposal of euthanized animal carcasses. Section 3.4.2.1.2 describes Suffolk County as in non-attainment for O3 and PM2.5 based on New York State Department of Environmental Conservation (NYSDEC) ambient air monitoring stations sited in densely populated areas to the west of Plum Island. Section 3.4.1 describes the methodology used in assessing potential air quality consequences. Air emissions were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF does not significantly affect the region's ability to meet air quality standards and that applicable control device technology is implemented.

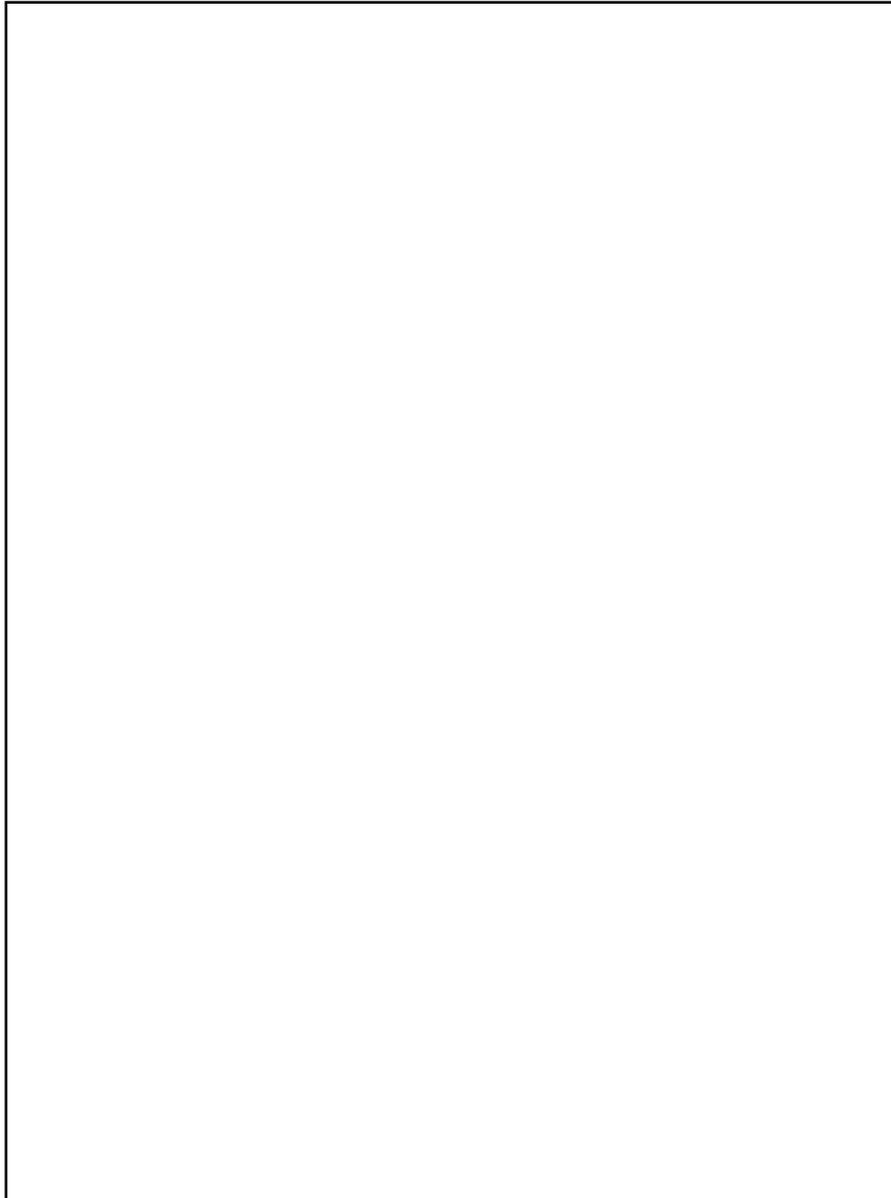
Comment No: 11 Issue Code: 19.0

DHS notes the information provided by the commentor.

Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area, 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).

Comment No: 12 Issue Code: 15.1

DHS notes the commentor'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.

DHS notes the commentor's statement regarding employment. The number of short-term and permanent jobs are discussed in Section 3.10. It is expected that approximately 2,700 direct temporary jobs (2,100 for the Plum Island Site) would result from construction of the NBAF, with many of the jobs being filled locally. Between 250-350 permanent jobs would result from operation of the NBAF, with much of the scientific work force relocating to the region. Direct environmental effects would be low with all site alternatives as is summarized in Sections 2.5 and 3.18.

Norden, Melanie

Page 5 of 7

WD0500

3 cont.| 21.1 | known treatments or vaccines. Also, it is planned that the NBAF will have an Insectary, and the release of a pathogen as a loss of biocontainment of a vector is a credible scenario, as is the aerial application of insecticides which may repeatedly be required.

2 cont.| 4.1 | So, why did Mr. Verrico not apply the same evaluation criteria that the site selection committee did, with respect to an area's evacuation possibilities? And why did he have the arrogance and high handedness to suggest that "any evacuation plan for an area is whatever evacuation plans are already in place. We don't modify an area's evacuation plan, we don't know the details."

In other words, we make the mess, but you clean it up and better yet, you pay for it.

5 cont.| 19.1 | We have, on the North Fork, by the way, no integrated emergency management plan, particularly with respect to a pathogen or virus release or other public health or safety emergencies that might originate from Plum Island. In fact, when I spoke to Mr. Joe Williams, the Director of Suffolk County's Fire, Rescue and Emergency Services, he indicated to me that his plan, were an incident to occur at Plum Island, was to load those residents, who did not have cars, onto County buses and send them to shelters in Riverhead -- a laughable and completely inadequate solution were the situation not so critical.

12 cont.| 15.1 | Even our County Executive, Steve Levy, has on more than one occasion, and in the press, indicated the impossibility of evacuating our area. If an incident were to occur on Plum Island, we wonder whether the fallout from a disaster, akin to KATRINA, might happen here. If an threat to public safety or health were to occur at Plum Island, would our properties, our homes, wells, gardens, pets, fuel oil tanks, be insured or, would much of the damage be borne directly out of the pockets of area homeowners? There are many in Louisiana and Mississippi who are still waiting, and may wait forever, for their insurance companies to settle, and precious little that the federal government is doing about it.

7 cont.| 17.1 | Then there are a host of "everyday" questions. Not that anyone at the DHS would know it, but we have major, unrelenting parking problems at the Orient Point Ferry terminal. In various seasons, the parking lot is filled to capacity and cars are parked all along State Road 48, including right in front of the Plum Island Building, sometimes stretching for miles beyond.

The Town of Southold has no jurisdiction to enforce or regulate parking and despite numerous requests, this parking is not managed or controlled by the State of New York, and cars are rarely ticketed.

It is ludicrous that the DHS maintains, in Section 3-321 of the EIS that the Orient Point Ferry Terminal parking lot would be used for construction workers, and that traffic patterns from those construction workers, and occasional road "closings," over a four year construction period, would not have a noticeable impact on local traffic.

Where does the DHS suggest this traffic be re-routed to if construction of the NBAF were to take place at Plum Island, since it has already indicated, in the EIS, that most, if not all,

Norden, Melanie

Page 6 of 7

WD0500

7 cont.)  
17.1 | construction materials would be transported to Plum Island by road via New York side, over Rts. 25 and 48.

12 cont.)  
15.1 | *Regarding employment opportunities and job creation:* Repeatedly we've asked Plum Island officials for a headcount of the number of *local* residents employed on the Island. Though there are numerous assurances in the EIS of the millions of dollars of jobs and revenue that an upgrade to a BLS-4 site would generate, few if any of those jobs are presently held by LOCAL residents, and by that I mean residents residing in the Towns of Southold and Riverhead. Even the Director of Plum Island, Dr. Larry Barrett's home is in California.

So we doubt very much whether, as at present, our local community will benefit from the construction of the NBAF. Residents of Connecticut, New Jersey and elsewhere may get construction jobs, but there is no assurance that local economies will benefit.

13| 1.0 | Beyond our local concerns of building the NBAF on Plum Island, my concerns are broader. Should, in fact, the NBAF be built anywhere at all at present?

The GAO and the House Energy & Commerce Committee, among others, have raised serious concerns about the NBAF that DHS has not satisfied, including the feasibility of Foot and Mouth research being undertaken *anywhere* on the U.S. mainland. In the wake of the anthrax scandal, the question of a moratorium on the building of BLS-4 labs and the NBAF has been raised by many elected officials and everyday citizens.

14| 2.0 | Moreover, beyond the politicians and big business interests, are there any communities that actually *want* this behemoth in their backyards? And why should residents, at any of the proposed sites, be forced to pay for the millions of dollars in infrastructure and maintenance costs for the NBAF? Do we even know how much the NBAF will ultimately cost? And what about the staggering costs for back up power plants or, in the case of Plum Island, underground, underwater electricity cables?

3| 21.1 | I do *not* believe that the DHS can, at present, be entrusted with our future, either on the North Fork or elsewhere. In meetings at the other sites, for example, the DHS has often pointed to the safety record at Plum Island. But they've frequently left out a few things and failed to mention, for example, the 1978 breach of foot and mouth disease on Plum when virtually every animal on the island had to be killed or incinerated.

6| 18.1 | They also didn't mention Plum's multiple citations by the EPA for waste-quality violations or the huge amounts of bacteria being released into Long Island Sound which has, in turn, led to the citations and fines. *Nor did they mention that the Natural Resources Defense Council ranked Plum Island second in EPA permit violations among facilities along the New York/New Jersey coast.*

13 cont.)  
1.0 | I encourage our elected officials to call for a moratorium on the building of the NBAF until the DHS can provide more assurances to the American public of the safety and security of such a facility.

Comment No: 13      Issue Code: 1.0

DHS notes the commentor's opposition to NBAF. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. Appendix B of the NBAF EIS describes biocontainment lapses and laboratory-acquired infections in BSL-3 and BSL-4 laboratories in the United States and worldwide. The risk of an accidental release of a pathogen from the NBAF is extremely low.

DHS notes the commentor's statement. 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: 14      Issue Code: 2.0

DHS notes the commentor's concerns about long-term operation and maintenance of infrastructure improvements to the proposed NBAF site. DHS would maintain the NBAF and ancillary facilities in compliance with applicable environmental, safety, and health requirements and provide for safe operation and maintenance. The Federal government would be responsible for costs associated with the maintenance of NBAF facilities and improvements on the NBAF site. It is anticipated that the maintenance of infrastructure improvements outside the perimeter of the NBAF site would be the responsibility of the utility purveyor.

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.

Norden, Melanie

Page 7 of 7

WD0500

2 cont. | 4.1 | I also call on our elected officials to continually encourage examination of the security, safety, administrative and research procedures at Plum Island. The present and future health, safety and security of the residents of New York State, New Jersey, Connecticut and all of the New England is at stake.

15 | 25.1 | Don't build the NBAF here, or anywhere, until many more questions are answered, and  
16 | 5.0 | more thorough examination is complete. On the one hand, it is imperative that our Nation  
13 cont. | 1.0 | respond to threats to our borders and research of Foot and mouth disease and other viruses is critical.

2 cont. | 4.1 | But our Nation's security should never been at the expense of our nation's citizens, or of their environment and the many glorious living things that inhabit these United States.

Melanie Norden

[REDACTED]  
[REDACTED] NY [REDACTED]  
[REDACTED]

Comment No: 15 Issue Code: 25.1

DHS notes the commentator's opposition to the NBAF including the Plum Island Site Alternative.

Comment No: 16 Issue Code: 5.0

DHS notes the commentator's opinion.

Norton, Jane

Page 1 of 1

WD0636

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**From:** Jane Norton [jane@earthcal.org]  
**Sent:** Friday, August 22, 2008 10:30 PM  
**To:** NBAFProgramManager  
**Subject:** NO to NBAF

1|25.3

**I am in agreement with the Durham County Commisioners, the Raleigh City Council, the Butner Town Council, the Granville County Commissioners, U.S. Rep. Brad Miller and state Sen. Doug Berger, and the countless citizens who do not want the NBAF in Butner or anywhere in North Carolina. I actually think it's quite insane to bring it to any inland site.**

**thank you,  
Jane**

Jane Norton  
*ReSourcing Natural Solutions/Earthcal*  
919-321-1711  
[jane@earthcal.org](mailto:jane@earthcal.org)

[www.design-with-nature.com](http://www.design-with-nature.com)  
[www.earthcal.org](http://www.earthcal.org)  
[www.communitygreenguide.org](http://www.communitygreenguide.org) (coming soon)

*"The future belongs to those that give the next generation reason to hope" Pierre Teilhard de Chardin*

Comment No: 1      Issue Code: 25.3

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

**Nunally, Frances**

**Page 1 of 1**

**PD0071**

August 15, 2008

Yes,

My name is Frances Nunally. I am a citizen of Georgia, a graduate of the University of Georgia, a board member of the State Botanical Gardens, and very concerned.

<sup>1</sup>25.2 | I do not want the bio terrorism lab anywhere near our state. I just totally object to it.

Thank you.

Comment No: 1

Issue Code: 25.2

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