

Thrasher, III, Grady

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WD0589

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**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Sunday, August 24, 2008 11:57 AM  
**To:** NBAFProgramManager  
**Subject:** Proposed National Bio and Agro Defense Facility at Butner

**Please include the following on the record as concurring NBAF DEIS comments relative to Athens, GA.**

**Proposed National Bio Agra Defense Facility at Butner, NC**

- In 2008 the Department of Homeland Security (DHS) will determine where to relocate the aging Plum Island Animal Disease Center (PIADC) currently located on an isolated 840 acre island off the North Fork of Long Island in New York.
- One of the five remaining sites under consideration is a federally owned farm in Butner, NC, located three miles from I85 near Lake Michie, the water supply for Durham and in the watershed for Falls Lake, Raleigh's water supply.
- The proposed facility will include a "BSL-4" laboratory, defined by DHS as one which studies "microorganisms that pose a high risk of life-threatening diseases for which there is no known vaccine or therapy."
- DHS states that "Examples of microorganisms that could possibly be studied in a NBAF BSL-4 lab include Nipah, and Hendra viruses, both of which are emerging zoonotic diseases that can spread from their natural reservoir to human beings, and are often fatal."
- Other diseases that could be studied in the proposed BSL-4 facility include: Ebola, Small Pox, various deadly hemorrhagic fever viruses, and weaponized versions of Anthrax.
- According to the National Institute of Allergy and Infectious Disease (NIAID) the NBAF organisms studied at the proposed Butner lab would include "...the world's most dangerous microbes, several capable of rapid widespread human depopulation."
- A NC consortium promoting the facility along with local officials contend that the facility will boost the local economy and that it will be "leak proof" and completely safe.
- Deputy Raleigh City Attorney, Dan McLawhom, has filed objections to the funding and construction of the proposed germ laboratory in Butner, N.C. citing concerns over flow of wastewater into the watershed serving Raleigh.
- To date, Butner city commissioners' request for an informational meeting with DHS officials has gone unanswered.
- The existing PIADC which the proposed facility will replace has a disastrous record of leaks and security breaches:
  - July 21, 1954 – Plum Island worker contracts Vesicular Stomatitis after exposure to an infected animal.
  - December 24, 1967 – *The New York Times* reports "Fatal Virus Found in Wild

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Ducks on L.I.” A virus never before seen in the Western Hemisphere, which began with ducks on the North and South Forks of Long Island opposite Plum Island, spread across the entire continent by 1975.

- o 1971 – USDA proclaims that “Plum Island is considered the safest in the world on virus diseases. As proof of this statement there has never been a disease outbreak among the susceptible animals maintained outside the laboratory on the island since it was established.”
- o 1975 – PIADC begins work feeding viruses to “hard ticks,” including the Lone Star tick (now endemic to NY but before 1975 never seen outside of Texas) which is a carrier of *Borelia burgdorferi*, the Lyme Disease bacteria. First cases of the disease later known as Lyme Disease reported in Connecticut and Eastern Long Island, both directly across from Plum Island. Current epidemiologic data shows that epicenter of all U.S. cases of Lyme disease was centered at Plum Island, N.Y.
- o September 15, 1978 – News release: “Foot and Mouth Disease has been diagnosed in cattle in a pre-experimental animal holding facility at the Plum Island Animal Disease Center.” A documented outbreak had occurred.
- o 1979 – Internal investigation of the foot and mouth disease outbreak uncovers massive widespread failures in containment systems at PIADC. Committee report: “Recommend that Lab 101 not be considered as a safe facility in which to do work on exotic disease agents until corrective action is accomplished.”
- o 1979 – Disregarding the committee recommendation, the US Army undertakes investigation of deadly “Zagazig 501” strain of Rift Valley Fever at PIADC. Sheep held outside of the lab that should have been destroyed as part of the containment policy following the foot and mouth disease outbreak were vaccinated with an experimental Rift Valley Fever vaccine, in violation of the lab’s primary directive prohibiting outdoor experiments.
- o 1982 – Federal review board begun after foot and mouth outbreak issues annual report: “We believe there is a potentially dangerous situation and that without an immediate massive effort to correct deficiencies, a severe accident could result... [L]ack of preventive maintenance, [and] pressures by management to expedite programs have resulted in compromising safety.”
- o 1983 – Six Plum Island workers test positive for African Swine fever virus. Workers were not notified of their results.
- o 1991 – Federal government decides to privatize PIADC. A New Jersey company, Burns & Roe Services Corporation, is the low bidder and is awarded the contract. In order to cut costs, expensive safety and security measures are scaled back.
- o June 1991 – An underground power cable supplying Lab 257 at PIADC shorts out and is not replaced because there was no money left in the budget.
- o August 18, 1991 – Category 3 Hurricane Bob hits Plum Island knocking down overhead power lines connecting Lab 257 to its only remaining source of electricity, a generator at another location on the island. Freezers containing virus samples defrost, air seals on lab doors are breached, and animal holding room vents fail. The lab’s ‘fail-safe’ mechanism of ‘air dampers’ to seal off the facility also fail in the open position. Melted virus samples mix with infected animal waste on the floor while swarms of mosquitoes fill the facility.
- o September 1991 – USDA denies that any system failures occurred during the hurricane. Both workers in Lab 257 at the time of the blackout are fired. Both later develop mysterious undiagnosed diseases.

2|27.0

Comment No: 2

Issue Code: 27.0

DHS notes the information submitted by the commentor.

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2|27.0 (cont.)

- o 1992 – OSHA and EPA cite PIADC with hundreds of safety violations. OSHA returned five years later and found that the violations had not been corrected. At that time 124 new violations were found.
- o July 13, 1992 – While USDA continues to officially deny that any biological weapons research takes place at PIADC, fourteen Joint Chiefs of Staff, Army, and Pentagon officials visit Plum Island. Internal documents indicate that the visit was “to meet with [Plum Island] staff regarding biological warfare.”
- o Early 1990s – PIADC annual report to Congress is eliminated.
- o August 1999 – First four human cases of West Nile virus ever reported in the Western hemisphere are diagnosed on Long Island, NY. Horse farms, all within a five mile radius of one another, on the North Fork of Long Island directly opposite Plum Island, report horses dying following seizures. 25% of the horses in this small area test positive for West Nile virus. Of the 271,000 equines tested in three states at the time of the outbreak only those on the North Fork of Long Island were positive.
- o 1999 – *New York Post* quotes USDA spokesperson: “...top security [at Plum Islands] does not mean top-secret.” In spite of this statement, attempts to obtain information on the inventory of viruses in storage at PIADC under the federal freedom of information act were denied on the basis of ‘national security.’
- o 1999 – A cold war era document is declassified proving that in the early 1950s twelve vials of weaponized Anthrax (enough to kill over 1 million people) were shipped to PIADC. This revelation directly contradicts prior official statements to the contrary by government agencies.
- o 1999 – *New York Times* reports that PIADC is quietly beginning to upgrade to BSL-4 status. Public outcry prompts US Congressman Mike Forbes to intervene and funding for the project is killed in the 2001 federal budget.
- o July 2000 – New York State Department of Environmental Conservation (DEC) finds “very troubling” hazardous waste violations at PIADC prompting New York State attorney general to sue USDA.
- o July 2001 – Court approved consent order forces USDA to admit to sewage discharge violations.
- o September 2001 – Shortly after the 9/11 terrorist attacks someone begins sending weaponized Anthrax through the US mail, killing five people. Genetic analysis showed that the dry Anthrax spores used in the attack originated from USAMRIID (Fort Detrick, MD).
- o Even though USDA continued to deny the presence of weaponized Anthrax at PIADC the FBI included the following questions in their polygraph tests of scientists under investigation: “Have you ever been to Plum Island?” “Do you know anyone who works at Plum Island?” “What do they do there?”
- o August 2002 – PIADC workers go out on strike to protest unsafe working conditions.
- o December 2002 – National Resources Defense Council names Plum Island “number 2” of 12 worst polluters in N.Y. and N.J. A state senator on the task force comments: “What disturbs me is the consistent flow of misinformation.... I feel that some of the misinformation borders on a cover-up. [I]t shakes the foundation of our very form of government.”
- o 2002 – Pakistani police arrest Sultan Bashiruddin Mahmood, a nuclear physicist with ties to Osama Bin Laden, and Mullah Omar. From his residence they recover

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material on Plum Island.

- o June 2003 – President George W. Bush transfers control of PIADC to Homeland Security. Airspace over Plum Island remains unrestricted, and gates to Lab 101 are open and unguarded.
- o Leaks and security breaches have occurred at BSL-4 labs, not just at PIADC
  - 1994 – Virologist at Yale infected with Sabia virus (now designated as a BSL-4 agent). 75 other workers exposed.
  - 2001 – Multiple researchers infected with Plague at Rocky Mountain Lab in Montana.
  - April 2002 – Anthrax spores leaked at USAMRIID Lab (Fort Detrick, MD). Researcher tests positive for Anthrax.
  - March 1, 2003 – A package containing West Nile virus explodes at a Federal Express building in Columbus, OH airport exposing workers.
  - June, 2003 – 113 vials of Anthrax, Brucellosis, Ebola, and other organisms uncovered during excavation of a toxic waste site at Fort Detrick, MD

Dr. Tindall of the Triangle Biotechnology Institute, spokesman for the North Carolina consortium promoting the NBAF, had this to say in response to various questions about the proposed Butner facility.

- **Question:** On December 15, 2000 The National Institute of Allergy and Infectious Disease (NIAD) supported the construction of a new BSL-4 (Rocky Mountain Laboratory) because "...the RML campus is located in rural western Montana, well removed from major population centers. The location of the laboratory reduces the possibility that an accidental release of a biosafety level-4 organism would lead to a major public health disaster." In light of this internal government document which recommends siting a BSL-4 lab in an isolated area to protect the public, how do you explain your consortium's support for siting the proposed NBAF in Butner within a 50 mile radius of nearly 2 million people?
- **Answer:** The proximity of the Butner, NC site to the scientific resources of RTP, the NC State veterinary school, and the various university research centers outweighs the potential downside of locating the facility just outside a major population center, and in immediate proximity to the water supply for Raleigh and Durham.
- **Question:** What diseases would be studied in the NBAF BSL-4 lab if it comes to Butner?
- **Answer:** Only Nipah and Hendra viruses.
- **Questions:** Might DHS decide at some time in the future to study other BSL-4 agents such as Ebola?
- **Answer:** Yes.
- **Question:** The DHS website indicates that Foot and Mouth Disease is among the "diseases that would potentially be studied at the NBAF." But, Public Law 48-496 passed by the U.S. Congress in April 1948, states that "...no live virus of foot and mouth disease may be introduced for any purpose into any part of the mainland of the United States except coastal islands separated therefrom by waters navigable for deep-water navigation and which shall not be connected with the mainland by any tunnel..." Given existing federal law, how could DHS bring foot and mouth disease to Butner, N.C.?
- **Answer:** They could not unless Congress changed the law.
- **Question:** According to the DHS website "There has never been a public exposure at a BSL-4 lab in the United States." Is that true?

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3|2.0 (cont.)

- **Answer:** Yes.
- **Question:** What about a 1/21/2002 *Washington Post* report which uncovered the loss of dangerous microbes including Ebola from Fort Detrick in the 1990s? Or the deadly 2001 U.S Mail attacks with weaponized Anthrax originating from Fort Detrick?
- **Answer:** none.
- **Question:** When attempts were made to obtain information about Plum Island under the freedom of information act they were blocked for reasons of national security, even though USDA claimed that "top secret" work was not taking place there. Now that the U.S. is at war, we are living in a 'post 9/11' era and DHS has assumed control of the NBAF from USDA, it seems logical that research at the proposed Butner lab which is replacing PIADC would continue to be "classified" for reasons of national security. Will that be the case?
- **Answer:** No classified research will take place at the NBAF.
- **Question:** According to the scoping materials, the final decision regarding bringing NBAF to Butner is to be made in Washington, D.C., solely by DHS officials. If federal officials decide to bring NBAF to Butner, would people living near this facility have any mechanism to influence what goes on there?
- **Answer:** Yes. There will be a local oversight board.
- **Question:** Can you give me some details about that?
- **Answer:** No.

1|21.0  
(cont.)

We, the undersigned physicians, believe that the proposed NBAF poses a dire and unjustified health risk not only for the local population in Granville County, but also for the entire triangle region. To date, the public has been poorly informed of the exceptional risk posed by this facility. We believe it is our duty as physicians to educate the public so that they may protect themselves against this infringement of their right to remain safe in their own homes.

Joseph W. Melamed, M.D.  
 James O. Goodwin, M.D.  
 Robert F. Noel, M.D.  
 Kaushik Sen, M.D.  
 Linga Vijaya, M.D.  
 Veena H. Doshi, M.D.  
 Bev Tucker, M.D.  
 Dianne Dookhan, M.D.  
 Sally Smith, M.D.  
 Cynthia Robinson, M.D.  
 Joe Musapatike, M.D.  
 Mark J. Gruchacz, M.D.  
 Veerappan Sundar, M.D.  
 Glenn Charlton, M.D.  
 Martin Deal, M.D.  
 Peter Bronec, M.D.  
 Claire Poyet, M.D.  
 Lax H. Chudasama, M.D.  
 John M. Spargo, M.D.  
 Adrian Ogle, M.D.  
 Robert Cerwin, M.D.  
 Timothy Kwiatkowski, M.D.

Comment No: 1      Issue Code: 21.0

DHS notes the commentor's statement.

## Thrasher, III, Grady

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WD0669

**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Sunday, August 24, 2008 11:49 AM  
**To:** NBAFProgramManager  
**Subject:** M. Smith Griffith's letter to Secretary Chertoff dated March 25, 2008--Please add this to the record as an NBAF DEIS comment from Athens, GA.

M. Smith Griffith

March 25, 2008

Secretary Michael Chertoff  
 Department of Homeland Security  
 Washington, D.C. 20528

Dear Secretary Chertoff,

I am engaged in a spirited and broad-based community effort to protect Athens from what we believe to be poor judgment and misplaced priorities on the part of the administration of the University of Georgia and our elected representatives regarding the Department of Homeland Security's proposed National Bio and Agro Defense Facility.

- 1) 13.2 The University has offered up to DHS 66 acres of beautiful land along South Milledge Avenue, adjacent to the State Botanical Garden, overlooking the Middle Oconee River and close to our neighborhoods, schools and places of worship, to site this giant, environmentally invasive, degrading and potentially dangerous proposition. Why NBAF should be located where proposed in the middle of our community has not been answered by UGA or DHS other than "for convenience". Fortunately, an environmental impact statement is being prepared which, if competently and honestly done, should underscore how wrong this location is for such an undertaking.
- 2) 6.2
- 3) 4.2

- 4) 25.2 Enclosed are copies of two letters I have written, one to our Mayor and one to the President of our Chamber of Commerce, in opposition to this project. The letters provide a broader introduction to me as well as a more detailed explanation of the concerns of the Athens citizenry, both as to the project and the process by which Athens became "short-listed" by DHS as a potential NBAF location.

Please take our concerns to heart. The people of Athens do NOT accept NBAF, and we are prepared to fight by all legal means its imposition on our community.

Sincerely,

Comment No: 1                      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 the Middle Oconee River. 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.

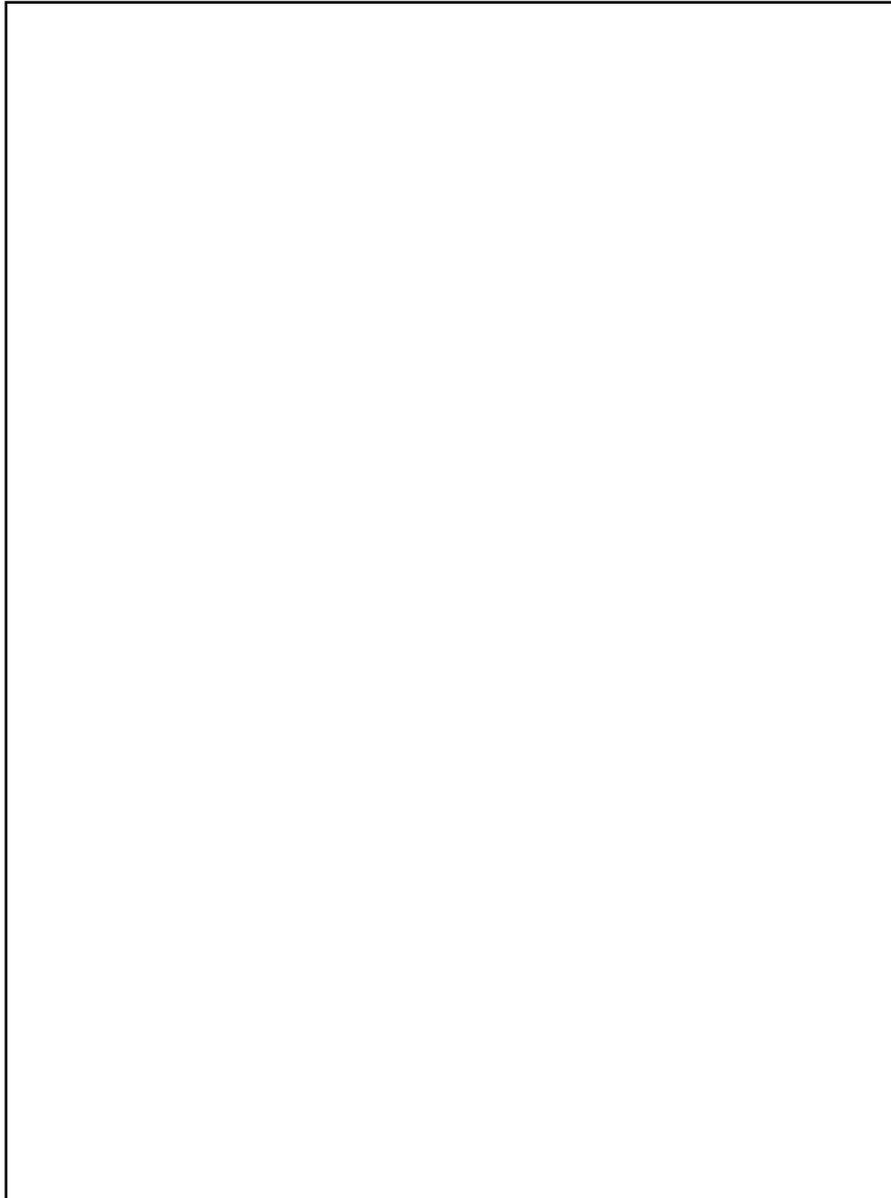
The forested portion of the NBAF site along the Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. Construction would occur primarily on disturbed pasture areas, and the high value forested riparian corridor would be retained. Therefore, the NBAF have minimal effects on wildlife and ecology of the State Botanical Garden. Retention of the forested buffer and the use of other mitigation measures would minimize potential impacts on the Middle Oconee River. As described in Section 3.8.3.2.3, best management practices and requirements for a stormwater pollution prevention plan would mitigate potential erosion and sedimentation impacts during the construction process. As described in Section 3.8.3.3.3, low impact design (LID) features would be used to minimize the potential for adverse impacts associated with stormwater runoff from the completed facility. Preliminary LID measures that are being considered include pervious pavement in both parking lots and pedestrian walkways, capturing and using roof runoff for landscape watering, and grading parking lots to filter storm water through landscaped areas.

Comment No: 2                      Issue Code: 6.2

DHS notes the commentor's concern. As described in Section 2.3.1, DHS's site selection criteria included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. Nevertheless, it has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF.

Comment No: 3                      Issue Code: 4.2

DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. The decision on whether to build the NBAF will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four



evaluation criteria discussed in section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Comment No: 4                      Issue Code: 25.2

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

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M. Smith Griffith

cc: James Johnson, NBAF Program Manager

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WD0300

**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Saturday, August 16, 2008 12:34 PM  
**To:** NBAFProgramManager  
**Subject:** FW: Connecticut Attorney General

-----Original Message-----

**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Saturday, August 16, 2008 12:32 PM  
**To:** nbafterprogrammanager@dhs.gov  
**Subject:** FW: Connecticut Attorney General

Dear NBAF Program Manager,

1|25.2 Please include the following series of emails as scoping comments from Athens, GA on the NBAF DEIS.  
 2|6.2 Also, please note for the record that the proposed S. Milledge Ave. site should be categorized as "unique and distinctive" rather than placed in the simple category of "rural" as stated in the DEIS. This is an IMPORTANT distinction. That land and that stretch of S. Milledge is beloved and critical to the quality of life in Athens. Constructing and operating the proposed NBAF at S. Milledge and Whitehall would be a land use totally inconsistent with the present principal use of the S. Milledge landscape for outdoor recreation and outdoor activities as described below.

Thank you,

Grady Thrasher  
 for FAQinc. "For Athens Quality-of-life"

-----Original Message-----

**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Saturday, August 16, 2008 12:22 PM  
**To:** Andy Herod  
**Cc:** hoard@athensclarkecountyga.gov; davison@athensclarkecountyga.gov  
**Subject:** RE: Connecticut Attorney General

Dear Andy,

We may be naively optimistic, but we hope to convince UGA to be altruistic and farsighted with regard to that beautiful, unique and distinctive stretch of S. Milledge. Much of S. Milledge is already devoted to outdoor recreation, beneficial public activities, whether for students or the general public (such as the Equestrian Center, the women's sports field, the new intramural fields being built across the street from the proposed NBAF site, and the State Botanical Garden), all of which add a distinctive flavor to the quality of life of our community and enhance the image of Athens as a place to live. Inevitably, Athens and UGA will grow, even without NBAF (assuming we can solve the water shortage issue for the long run). Athens will grow on its own merits or because Atlanta, within a decade or two, will creep toward us on GA 316 and transform our Classic City as it has Lawrenceville, Buford, Cumming and other once lovely places to live.

For that reason, we think the ACC government and UGA should work together to preserve for future generations, some of the special life-enhancing qualities Athens/Clarke County has remaining. An important one of these is the unique, distinctive and refreshing flavor of S. Milledge. I have already

Comment No: 1      Issue Code: 25.2

DHS notes the information submitted by the commentor.

Comment No: 2      Issue Code: 6.2

DHS notes the commentor's opinion.

## Thrasher, III, Grady

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mentioned this idea to Kathy Hoard. She stated "I don't know how to respond to such a suggestion". You may want to bring it up at the next ACC Commission meeting. It could be a great way to start thinking outside of "the box, within a box, within a box".

Kindest regards,

Grady Thrasher

-----Original Message-----

**From:** Andy Herod [REDACTED]  
**Sent:** Saturday, August 16, 2008 10:51 AM  
**To:** Grady Thrasher, III; [REDACTED]  
**Subject:** Re: Connecticut Attorney General

Grady: you do realise, of course, that even if NBAF isn't built at that site that UGA has plans to build something else there (or have you not seen UGA's master plan?), so that the argument that the site will remain pristine if NBAF doesn't come is fallacious?

Andy

Andy Herod  
District 8 Commissioner  
Unified Government of Athens-Clarke County, Georgia

315 Brookwood Drive  
Athens, GA 30605  
706 543 0281  
[REDACTED]  
[www.athensclarkecounty.com/commission](http://www.athensclarkecounty.com/commission)

----- Original Message -----

**From:** "Grady Thrasher, III" [REDACTED]  
**To:** [REDACTED]  
**Sent:** Saturday, August 16, 2008 9:16:16 AM  
**Subject:** FW: Connecticut Attorney General

Ken,

Kathy and I appreciate your coverage of the NBAF meetings on Thursday. It looks now like the officials of some states (below) are actually protecting their citizens. You will note my comment to Bob Smith, our state representative for a portion of the Athens/Clarke and all the Oconee area. Copies have been sent to the ACC and Oconee Commissioners. Most continue eager to put our community at risk and to degrade the environment of the site next to the Botanical Garden in the name of "economic development".

Thrasher, III, Grady

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WD0300

Best regards,

Grady Thrasher  
[REDACTED]

-----Original Message-----

**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Saturday, August 16, 2008 8:33 AM  
**To:** [REDACTED]  
**Subject:** FW: Connecticut Attorney General

Bob,

It looks like the Athens/Clarke/Oconee area is not the only community that might involve a court fight to keep NBAF at bay. The difference, of course, is that, in the case of Connecticut, the elected representatives are seeking to protect the people. In our case, the people have to take responsibility for protecting themselves.

Best regards,

Grady

-----Original Message-----

**From:** Nancy zechella [REDACTED]  
**Sent:** Friday, August 15, 2008 10:06 PM  
**To:** mayor@athensclarkecounty.com; heidavison@co.clarke.ga.us; lowry@athensclarkecountyga.gov; sims@athensclarkecountyga.gov; maxwell@athensclarkecountyga.gov; kinman@athensclarkecountyga.gov; lynn@athensclarkecountyga.gov; jordan@athensclarkecountyga.gov; hoard@athensclarkecountyga.gov; herod@athensclarkecountyga.gov; girtz@athensclarkecountyga.gov; dodson@athensclarkecountyga.gov; [REDACTED]

**Subject:** Connecticut Attorney General

<http://www.ct.gov/ag/cwp/view.asp?Q=421234&A=2795>

Connecticut Attorney General's Office

Press Release

Thrasher, III, Grady

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WD0300

**Attorney General Fights Proposed Plum Island Lab That Would Study  
Deadliest Animal And Human Diseases**

August 14, 2008

Attorney General Richard Blumenthal today announced that his office is preparing formal comments to fight a Department of Homeland Security (DHS) proposal to develop a Level 4 research lab -- involving the study of some of the deadliest biological threats to humans -- on Plum Island.

The DHS acknowledges in its own draft environmental impact statement that the proposed Level 4 facility would deal with "microorganisms that pose a high risk of life-threatening disease and for which there is no known vaccine or therapy."

Plum Island, located about eight miles off the Connecticut shore, now operates as a Level 3 facility involving the study of only animal to animal pathogens. A Level 4 designation, the most secure, would allow scientists to study more deadly diseases that can be passed on to humans.

The DHS has identified Plum Island as one of six potential sites for the new National Bio and Agro-Defense Facility.

"I will fight this proposed Plum Island expansion -- involving insidious and deadly diseases that have no known cures, nearly eight miles off Connecticut's shore in the midst of environmentally precious and highly populated areas," Blumenthal said. "This vastly heightened risk level poses unacceptable costs and dangers. The cost of police and fire safety may be borne by local governments. Dire public health dangers of leaks or terrorist attacks make this site clearly and completely unacceptable. A Level 4 facility would make Plum Island, and surrounding areas on both sides of the Sound, a prime terrorist target.

"Connecticut has close and personal experience with pernicious diseases transmitted by animals to humans such as anthrax and Lyme -- all the more reason to challenge this proposed vast expansion.

"Both sides of the Sound should join forces, as we did with Broadwater, in fighting this environmental and security threat. Our next step will be to file formal comments on the draft environmental impact statement, urging that it be sited elsewhere."

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Content Last Modified on 8/14/2008 1:39:05 PM

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Windows®. [Game with Windows](#)

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WD0878

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**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Monday, August 25, 2008 6:03 PM  
**To:** NBAFProgramManager  
**Subject:** Emailing: OnlineAthens.com Letters to the Editor Grady Thrasher & Kathy Prescott NBAF a 'dark cloud' over Botanical Garden 04-10-08  
**Attachments:** OnlineAthens.com Letters to the Editor Grady Thrasher & Kathy Prescott NBAF a 'dark cloud' over Botanical Garden 04-10-08.htm

Dear NBAF Program Manager,

1| 27.0 | Please add the attached letter to the editor published in the Athens  
Banner-Herald to the record of comments on the NBAF DEIS from Athens, GA.

Thank you.

Comment No: 1      Issue Code: 27.0  
DHS notes the information submitted by the commentor.

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WD0878

**Grady Thrasher & Kathy Prescott: NBAF a 'dark cloud' over Botanical Garden**

| | Story updated at 8:16 PM on Wednesday, April 9, 2008

A Tuesday Banner-Herald feature story, "[How our Garden's grown](#)," gives a beautiful and appropriate tribute to the State Botanical Garden, founded as a farsighted and altruistic undertaking by the University of Georgia 40 years ago. Garden Director Jeff Lewis' statement in the article that there is a "feeling of ownership by the greater Athens community" is confirmed daily by the people, including busloads of schoolchildren, enjoying the garden in its peaceful, natural setting between South Milledge Avenue and the Middle Oconee River.

As an added bonus during the garden's 40th year, on May 17, the Audubon Society will dedicate the garden's natural woodland and wetland setting, in combination with acreage in UGA's Whitehall Forest a mile or two away, as an Important Bird Area. IBAs are part of a global effort to identify the most important places for bird populations and to focus conservation efforts on those sites. UGA rightly has publicized with pride its links to the State Botanical Garden, Whitehall Forest and the IBA.

A dark cloud hangs over all of this, however. The same University of Georgia has invited the federal Department of Homeland Security to impose its proposed National Bio- and Agro-Defense Facility, the immense, high-impact project the size of two or three Super Wal-Marts, on 66 pastoral acres between the two segments of the IBA and alongside the garden, likely destroying the IBA and seriously harming the environment and ecology near the garden.

How this particular site was so easily anted up by UGA to buy into DHS's NBAF sweepstakes competition is a question for future examination. For now, let's hope the environmental impact study currently being undertaken by DHS will save the garden, the IBA and the community from UGA's ill-considered decision.

**Grady Thrasher****Kathy Prescott**

• Thrasher and Prescott are affiliated with For Athens Quality-of-life, a nonprofit group opposed to locating NBAF in Athens-Clarke County.

Published in the Athens Banner-Herald on 041008

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WD0331

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**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Monday, August 18, 2008 4:23 PM  
**To:** NBAFProgramManager  
**Subject:** FW: newspaper article scan Oconee County, GA NBAF DEIS scoping comment  
**Attachments:** newspaper article scan.jpg

14.2 Please include the attached article published in the Oconee Enterprise, one of Oconee County, GA's weekly newspapers, as a scoping comment on the NBAF DEIS relative to the proposed Athens, GA site.

Thank you.

-----Original Message-----

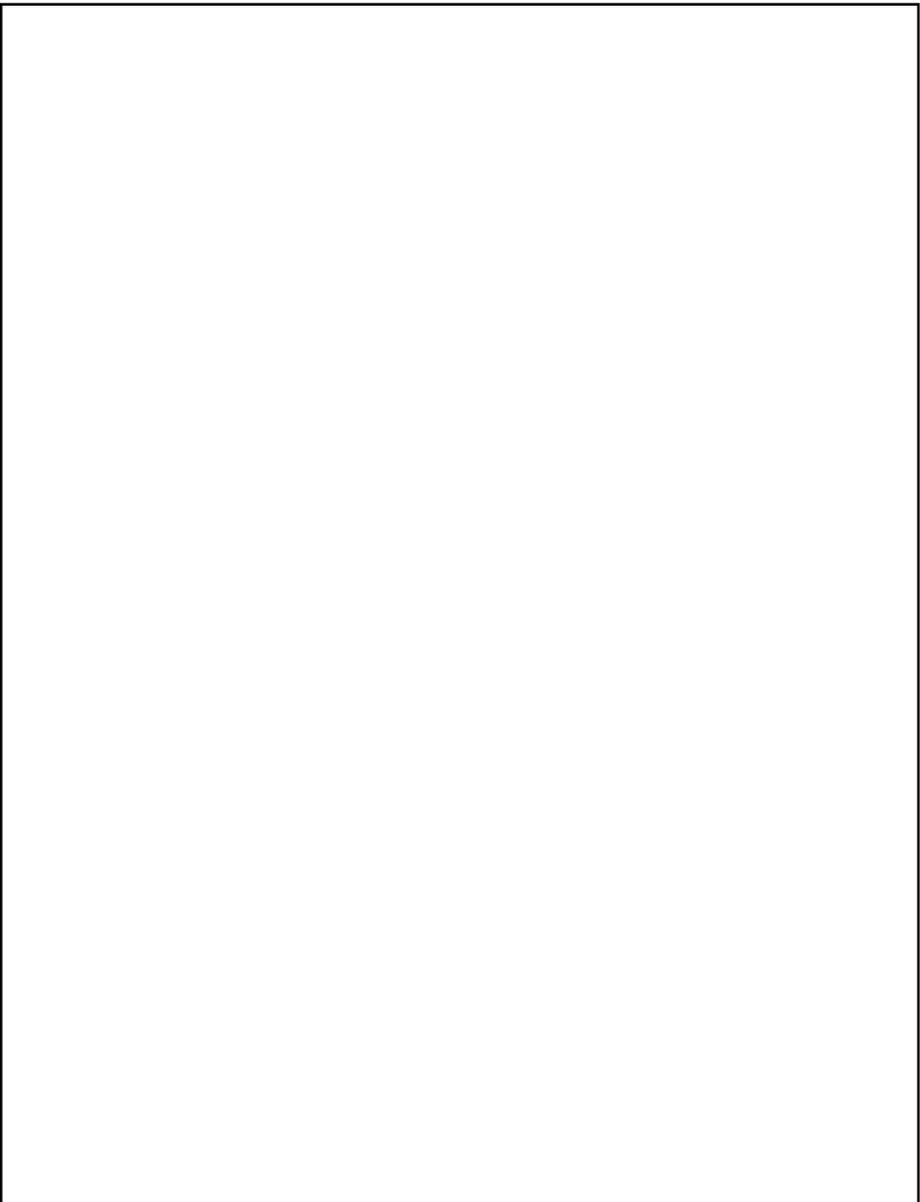
**From:** Printz Plus [REDACTED]  
**Sent:** Monday, August 18, 2008 3:14 PM  
**To:** [REDACTED]  
**Subject:** newspaper article scan

-----  
Cody Davis  
Graphic Designer  
Printz Plus  
[REDACTED]

Comment No: 1      Issue Code: 27.0  
DHS notes the information submitted by the commentor.

Thrasher, III, Grady

Page 2 of 2



WD0331

# Dangers outweigh benefits of bio lab

AUGUST 14, 2008

Would county officials approve a Level 4 Lab in the middle of any subdivision in the county?

Probably not. Would they approve a Level 4 Lab near your subdivision, "near" meaning within the 6-mile radius affected by an accidental release of dangerous pathogens?

It appears they are about to do just that—unless, of course, they take the time to learn the pros and cons of the NBAF—a Level 4 Lab that has a chance of being built slap dab in the middle of a highly inhabited area, mine and your neighborhoods within that 6-mile radius and on the shores of the Ocoee River.

Although plans were to liquefy the carcasses and discharge them to the Athens sewer system, they are now considering using an incinerator to burn the carcasses. The distance of homes from the Lab will not matter. The discharge from incineration will float over and into whatever neighborhoods are downwind from the Lab depending on the direction the wind is blowing that day. So it could blow your way any time of the day or night or all day and night.



**Kate McDaniel**  
*Keeping It Clean*

The Environmental Impact Study (EIS) has been published and like any publication printed by the federal government, the executive summary is meant to be read and read no further. Well, in this publication, the executive summary and the body of the hundreds of detailed pages are in opposition, the first very positive for construction of such a lab while the detailed portion lists numerous risks and possible contamination of persons and destruction of the large animals in the area when an accident occurs.

Most people will read the summary only and conclude that UGA is justified in its endorsement. This is a common mistake when dealing with governmental documents, and I suspect that the first news of such a large facility coming to the area made recipients joyful but who then failed to further investigate the details. Such details give a grim picture of the environmental impact. Perhaps our elected officials have jumped too soon at the chance to endorse it before the EIS was made available, giving the appearance that they as well as the public have been deceived.

Information published in the area newspapers have indicated that both chambers of commerce (Clarke and Oconee) have endorsed it, stating we need the jobs that such a development will bring to the area. Both commission chairs have shown enthusiasm for its coming, and the development authorities in both counties are on board. In addition, the governor and both our state representatives have endorsed it, saying that job creation and economic development are paramount for the "common good."

I understand that a move is underway to re-educate the group mentioned above to the dangers of such a venture. Grady Thrasher and his wife have sent letters to each individual in these governing bodies of both counties with an invitation to keep an open mind and ask more questions to understand the facts before making a decision later in the fall. Many citizens are following their lead and taking a second look by "reading the fine print" before agreeing that it's a good move.

NBAF (National Bio and Agro-Defense Facility) is a federal effort by the Department of Homeland Security to build a Level 4 lab (highly contagious pathogens) somewhere inland to replace the similar lab on Plum Island. Shouldn't we pause to consider why such a facility was constructed on an island away from the population in the first place?

My question is: Is it distinguishable and inappropriate for elected officials to make a decision for the "common good" of a community when that decision will sacrifice the safety and quality of life for a few who live in that same community? Elected officials, are you listening to your constituents?

*Kate McDaniel, a resident of Oconee County, is retired from the U.S. Environmental Protection Agency. Opinions of all columnists do not necessarily reflect the views of this newspaper.*

Thrasher, III, Grady

Page 1 of 2

WD0324

**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Monday, August 18, 2008 1:19 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF EIS comments (letter from David Wenner-geologist) re S. Milledge site

James V. Johnson  
 Program Manager  
 Department of Homeland Security

18-August, 2008

Dear Mr. Johnson,

I wish to provide comments on portions of the Draft Environmental Impact Statement published on June 2008 titled: US Department of Homeland Security National Bio and Agro-Defense Facility. These comments mainly extend to sections dealing with the geology and soils of the South Milledge Avenue site in Athens, Georgia. It is my view that this report does not adequately address a number of critical environmental issues. By way of background, I am a geologist and recently retired from the geology department of The University of Georgia.

In review of these sections of the draft EIS report for the proposed NBAF site, it seems likely that the extent of the shallow depth of the underlying bedrock is not adequately assessed or discussed. Although I have not personally investigated this site, I have studied the geology at the State Botanical Garden of Georgia that lies about 2000 feet to northwest. Most of my studies were made with researchers in the College of Environmental and Agricultural Sciences as part of an investigation of nitrate contamination of streams and groundwater (the results of this study are not published but a report was submitted by Dr. David Radcliffe to the Dean of the College of Environmental and Agricultural Sciences in 2004). It is my opinion that the same geologic environment exists at the NBAF site as at the State Botanical Garden.

My investigation of the geology and soils at the State Botanical Garden of Georgia revealed that the thickness of the regolith (unconsolidated residual or transported material that overlies the solid rock) is highly variable, but in general, areas with moderate to steep slopes have a very thin regolith. This is evident from observations of numerous rock outcrops at the surface and from the borehole data. In contrast, in the upland areas where slopes are low, the regolith is generally thicker. This situation probably occurs because extensive erosion occurred along hill slopes because of poor agricultural practices in the early 1900's.

What is of concern at the NBAF site is that, as shown in Figure 2.3.2-2, the proposed laboratories are to be built mainly in areas characterized by Pacolet soils. These soil types occur in areas with moderate slopes as shown in Figure 3.6.3.1-2. Thus there is every reason to expect that the regolith in the proposed building site may be very thin and thus that bedrock may lie just below the surface in many areas.

Although it is not known to what extent the NBAF laboratories will be built below ground, even level grading in a terrain of moderate slope will likely require a considerable amount of excavation of bedrock. If the laboratories are to be built mostly below ground, this will require extensive excavation of bedrock, on the size of a quarry. Excavation of bedrock requires blasting and haulage. I am concerned about the environmental impact of this activity.

Comment No: 2                      Issue Code: 4.2

DHS notes the commentor's construction in bedrock concerns. The NBAF EIS Section 3.6.3 describes the South Milledge Avenue Site alternative's soil and geological conditions and Section 3.6.3.2 describes potential construction consequences. A detailed geotechnical report will be prepared for the selected site and will be used in the NBAF's final design specifications including subsurface rock strata and construction implications.

Comment No: 3                      Issue Code: 11.2

DHS notes the commentor's concerns with noise from potential blasting of bedrock. Section 3.5.3 of the NBAF EIS describes the potential construction and operational consequences from noise affects at the South Milledge Avenue Site alternative. Once a site is selected, a detailed geotechnical report will be prepared and results included in construction management efforts. If blasting is required, steps will be taken to minimize the blast number(s), intensity, and duration. A blasting plan would be developed implementing blasting measures such as minimizing explosive weights, stemming depths and material, and delay configurations all to mitigate potential noise levels.

Thrasher, III, Grady

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WD0324

4| 10.2 | What will noise levels be from blasting and how will this impact the adjacent State Botanical Garden and the local community? How much rock will be removed from the site and where will this material be taken? How much will this increase the cost and time of construction? None of these questions are addressed in the draft EIS report.

5| 23.0 | Another concern is the impact of fuel storage facilities. According to the Site Characterization Report released on July 25, 2008, about 550,000 gallons of fuel will be stored on site. Assuming these tanks are located underground and in proximity to the Central Plant (an area of moderate slope and thus likely shallow regolith), there is every reason to believe that they will have to be built in bedrock. Borehole data mentioned in the Site Characterization Report also reveal relatively shallow groundwater levels in some areas. If these estimates are valid for the region in question, then what measures will be taken to permanently dewater the site so underground storage tanks can be utilized? What happens if one or more of these tanks leak (as they most likely will in time) and thus contaminate the groundwater? This is critical because any groundwater contamination will almost certainly migrate to the river via fractures in the bedrock and will be nearly impossible to clean up. This same thing is happening in adjacent areas in the State Botanical Garden of Georgia because of leaking swine lagoons. The draft EIS report does not address the potential environmental impact of the fuel storage tanks.

6| 12.2 | In summary, I find that the draft EIS report does not address some very important environmental issues for the Athens site both during the construction and operation of the NBAF facilities. Although the Site Characterization Study does provide some additional information, this report also does not address many of the environmental issues raised here. It is my judgment that from a geological perspective, the South Milledge Avenue site is not a good location for an NBAF facility.

2 cont. |  
4.2

Respectfully Submitted,

Dr. David B. Wenner



Comment No: 4                      Issue Code: 10.2

DHS notes the commentor's concerns with noise from potential blasting of bedrock. Section 3.5.3 of the NBAF EIS describes the potential construction and operational consequences of NBAF on the acoustic environment at the South Milledge Avenue Site. Once a site is selected, a detailed geotechnical report will be prepared to help finalize the final NBAF design with the results used to develop detailed construction plans and techniques. If blasting is required, efforts will be taken to minimize the blast number(s), intensity, and duration. A blasting plan would be developed implementing construction measures such as minimizing explosive weights, stemming depths and material, and delay configurations all to mitigate potential noise levels.

Comment No: 5                      Issue Code: 23.0

DHS notes the commentor's construction costs regarding excavation. The Site Cost Analysis for the NBAF can be obtained online through the NBAF Web page (<http://www.dhs.gov/nbaf>). A detailed geotechnical report will be prepared for the selected site and will be used in the NBAF's final design specifications including subsurface rock strata and construction implications.

Comment No: 6                      Issue Code: 12.2

DHS notes the commentor's concerns regarding the risk of groundwater contamination that could be posed by underground fuel storage tanks. As designed, no underground fuel storage tanks are proposed for this site.

Thrasher, III, Grady

Page 1 of 3

WD0323

**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Monday, August 18, 2008 1:16 PM  
**To:** Phillip Ingram; NBAFProgramManager  
**Subject:** FW: Our own worst bioenemy - LA Times

1|2.0 | Please include the following newspaper article in the scoping comments regarding the NBAF DEIS relative to the Athens, GA location.

Thank you.

-----Original Message-----

**From:** Matt DeGennaro [REDACTED]  
**Sent:** Monday, August 18, 2008 1:01 PM  
**To:** [REDACTED] Grady Thrasher, III; Nancy zechella  
**Subject:** Our own worst bioenemy - LA Times

...you may have already seen this, but it's good "big picture" stuff..."

[http://www.latimes.com/news/opinion/la-oe-orent13-2008aug13\\_0,1045104.story](http://www.latimes.com/news/opinion/la-oe-orent13-2008aug13_0,1045104.story)

*From the Los Angeles Times*

## Our own worst bioenemy

The U.S. bioweapons program has grown so large that it has become a threat to Americans.  
 By Wendy Orent

August 13, 2008

"Whatever you can say about the Soviet bioweapons scientists," a Bush administration official once told me, "they never killed anyone."

We can't say the same about our bioweapons scientists. Someone, most likely Bruce Ivins, at the U.S. Army Medical Research Institute of Infectious Diseases at Ft. Detrick, Md., turned powdered anthrax spores into a deadly weapon. It's ironic that the Soviet scientists were making offensive weapons. Our people, since 1969, have worked strictly to defend us.

One of those defenders killed five people, sickened 17 others and plunged the nation into hysteria for weeks in the fall of 2001. After a seven-year investigation by the FBI, the source of the deadly anthrax strain has been identified -- our own biodefense program at Ft. Detrick. That is the real legacy of the FBI investigation.

Since the anthrax-laced letters were mailed in September and October of 2001, U.S. biodefense has blown up out of all proportion to any rational assessment of the bioweapons threat. Earlier this year, an article in the journal *Biosecurity and Bioterrorism*, analyzing government biodefense spending from 2001 to 2008, stated that \$49.66 billion has been allocated for civilian biodefense. According to microbiologist and longtime biodefense critic Richard Ebright of

Comment No: 1      Issue Code: 2.0  
 DHS notes the information submitted by the commentor.

## Thrasher, III, Grady

## Page 2 of 3

WD0323

Rutgers University, actual spending is even higher, amounting to \$57 billion.

In 2005, he and 757 other microbiologists sent a stinging open letter to Elias Zerhouni, director of the National Institutes of Health, protesting the government's preoccupation with "priority pathogens" -- germs such as anthrax that could be used in a bioweapons attack. But Zerhouni and Anthony Fauci, director of the National Institute of Allergy and Infectious Diseases, would have none of it. In a letter published in the journal *Science*, they disagreed: "The United States has experienced an anthrax attack, and security experts repeatedly express concern that future attacks with biological weapons are likely, if not inevitable."

But we didn't actually experience an anthrax attack. The whole incident amounted to a snake eating its own tail. No ingenious biowarrior from Al Qaeda sent the lethal envelopes through the U.S. postal system. An American scientist did. The FBI and its genetic analyses leave no doubt: Though 16 laboratories had access to the "Ames strain" of anthrax used in the letters, only the samples that came from Ivins' laboratory at Ft. Detrick matched the genetic fingerprint of the attack strain.

In the sorry aftermath of the anthrax investigation, it's clear that the National Institutes of Health and the Centers for Disease Control and Prevention have to rethink the priority-pathogens list, which includes anthrax, smallpox, plague, tularemia, Ebola and other germs that rarely, if ever, threaten American lives. It's the "non-defense-related" germs that are killing us. Randall Wolcott of the Southwest Regional Wound Care Center points out that 500,000 Americans a year die of biofilm infections -- such as diabetic ulcers -- that are almost impossible to treat by conventional means. That's almost twice as many as die of cancer.

According to the CDC, infections caused by methicillin-sensitive *Staphylococcus aureus*, or MRSA, kill 19,000 people a year. Still, staph itself isn't considered a priority pathogen, despite the emergence of highly resistant and increasingly virulent strains. Only one of 40 staph toxins is on the priority list.

There's another problem created by the priority-pathogens list. The ballooning of the biodefense program, according to Ebright, means that about 14,000 individuals are now considered qualified to work with priority pathogens.

It hasn't always been easy to find qualified people for this research. In the days when the FBI was pursuing former "person of interest" -- and now exonerated -- Steven J. Hatfill, one senior government scientist said of Hatfill's background, "You take what you can get -- not many people with his abilities show up very often." So where do 14,000 suddenly qualified biodefense experts come from? And how can they be vetted? As biodefense expert Leonard Cole, author of "The Anthrax Letters," told me: "There are 15,000 to 16,000 people now working in labs on select agents -- that's many more possibilities of another bizarre individual doing illicit work."

The lesson of the anthrax letters isn't that we're in danger of a bioweapons attack from terrorists. It's that U.S. biodefense itself has become a threat: We have met the enemy -- and it is us.

The next administration should pull the plug on the biodefense excesses of the Bush

**Thrasher, III, Grady**

**Page 3 of 3**

**WD0323**

administration and put most of the thousands of microbiologists to work on the germs we really need to worry about.

Wendy Orent is the author of "Plague: The Mysterious Past and Terrifying Future of the World's Most Dangerous Disease."

Thrasher, III, Grady

Page 1 of 2

WD0331

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**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Monday, August 18, 2008 4:23 PM  
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**Subject:** FW: newspaper article scan Oconee County, GA NBAF DEIS scoping comment  
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**From:** Printz Plus [REDACTED]  
**Sent:** Monday, August 18, 2008 3:14 PM  
**To:** [REDACTED]  
**Subject:** newspaper article scan

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Cody Davis  
Graphic Designer  
Printz Plus  
[REDACTED]

Comment No: 1      Issue Code: 4.2  
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Thrasher, III, Grady

Page 2 of 2

WD0331

# Dangers outweigh benefits of bio lab

AUGUST 14, 2008

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**Kate McDaniel**  
*Keeping It Clean*

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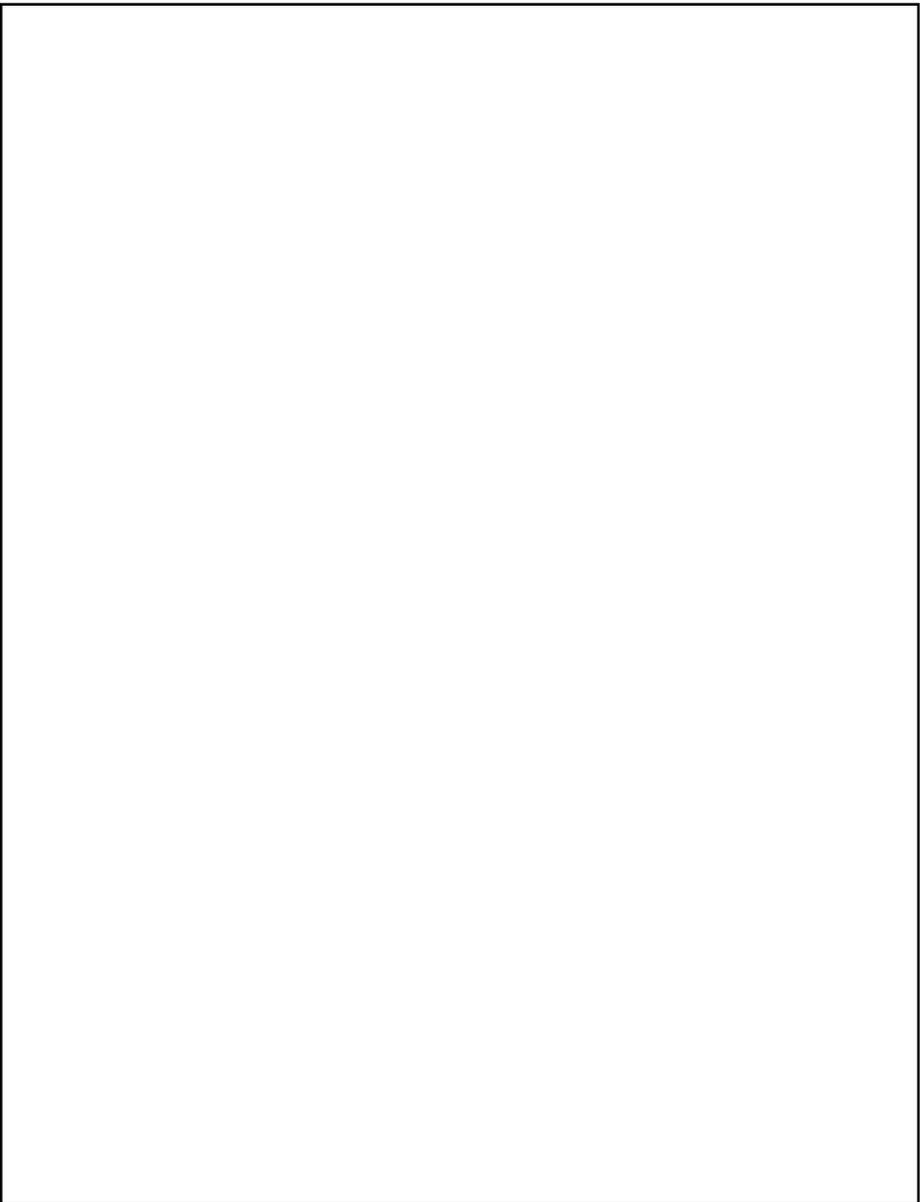
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Thrasher, III, Grady

Page 1 of 4

WD0055

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**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Sunday, July 13, 2008 9:31 AM  
**To:** NBAFProgramManager  
**Subject:** FW: Emailing: CDC SAFETY Germ lab outages continue ajc.com  
**Attachments:** CDC SAFETY Germ lab outages continue ajc.com.htm

Dear NBAF Program Manager,

1|25.2 | Please place this on the NBAF scoping record under "Athens, Georgia does not want NBAF".

Thank you,

Grady Thrasher

-----Original Message-----

**From:** Grady Thrasher, III [mailto:hgt@thrasher.com]  
**Sent:** Sunday, July 13, 2008 9:27 AM  
**To:** [REDACTED]  
**Subject:** Emailing: CDC SAFETY Germ lab outages continue ajc.com

Heidi,

Please note the attached article in today's AJC regarding another power outage at the CDC with backup generators failing. This occurred Friday. At the end of the article is a list of recent occurrences at the CDC. Human error and technical failings seem to occur with startling frequency. We at FAQ are sending this in to the NBAF Program Manager to put it on the scoping record. With NBAF, DHS is engaging in an entirely new, previously untried and unproven effort by to build the world's largest bio-containment area for the infection and disposal of hundreds of large animals and insect carriers. Several of the most deadly diseases to be studied can be transmitted by aerosol means and in at least one example can be spread to humans via mosquitos. An FMV release, according to DHS's own DEIS, could cause billions in economic loss and could spread to several states in a matter of days. It seems the risks of accident and miscalculation are even greater than what the CDC is actually experiencing.

Again, the question is: How much risk should a community be subjected to for an illusory economic benefit.? Who balances that equation?

Best regards,

Grady Thrasher and Kathy Prescott

FAQinc. "For Athens Quality-of-life"

Comment No: 1                      Issue Code: 25.2

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

## Thrasher, III, Grady

## Page 2 of 4

WD0055

**CDC SAFETY: Germ lab outages continue**

By Alison Young  
The Atlanta Journal-Constitution  
Published on: 07/13/08

A laboratory building that contains a deadly strain of avian flu and other germs is among four that lost power for more than an hour Friday when a backup generator system failed again at the Centers for Disease Control and Prevention.

The outage affected air flow systems in labs that help contain such germs as the H5N1 flu virus, which some experts fear could cause a pandemic. But there were no exposures to infectious agents, and neither workers nor the public were at any risk, said CDC spokesman Tom Skinner.

The outage is the latest in a string of mechanical and construction incidents at labs on the agency's Clifton Road campus — many in new buildings that are part of a \$1 billion construction plan.

Last summer, an hourlong power outage at a different CDC lab tower, called Building 18, resulted in a congressional hearing. The Government Accountability Office, the investigative arm of Congress, is still examining safety at the CDC's high-containment laboratories amid concerns raised years ago by agency engineers that the CDC's backup power system was likely to fail.

"It's important for people to understand that even though we lose power to these facilities from time to time, worker safety and the public's safety is not in jeopardy because multiple, redundant systems are in place, separate from those that rely on power," Skinner said Saturday.

Around 5:40 p.m. Friday, a Georgia Power transformer failed, cutting off electricity to part of the CDC campus. CDC's backup generators initially came on, Skinner said. But then the system detected some sort of power anomaly and shut itself off, cutting off backup power to three buildings, he said.

The buildings affected were:

> Building 17, a newer infectious disease research lab building, where scientists work with rabies, HIV, influenza and tuberculosis, including extensively drug-resistant strains. The building has Biosafety Level 3 (BSL-3) labs, which need electricity to maintain negative airflow. This key safeguard helps contain germs by making sure air is always being drawn into the lab and through special HEPA filters before leaving the building. When power is lost, the lab has neutral air that neither flows in or out.

> Building 20, a newer office building that also houses the agency's fitness center.

> Building 1 and Building 3, antiquated attached office buildings from about 1959.

Information about whether any labs were in use at the time of the outage was not immediately available Saturday, Skinner said.

**Thrasher, III, Grady****Page 3 of 4****WD0055**

"This happened late in the day and there were not many employees still in the buildings," Skinner said. "Those in the buildings evacuated without incident."

The power was out for about 1 hour and 15 minutes, Skinner said, and was restored when Georgia Power fixed the transformer problem.

A bird caused the blown Georgia Power transformer, said power company spokesman Jeff Wilson.

CDC officials did not attempt to override and restart the agency's backup generators because they didn't know what the anomaly was that shut them down, Skinner said.

Skinner also said there was no power disruption at Building 18, the \$214 million Emerging Infectious Diseases Laboratory that suffered the hourlong outage last summer.

The Atlanta Journal-Constitution reported last summer that government construction engineers had warned since 2001 that CDC's planned design for its centralized backup power generation system would not keep crucial lab systems from failing in an outage.

"I've been saying this for over three years now, but having the generators in this configuration gives us no protection whatsoever from many types of failures," CDC mechanical engineer Johnnie West wrote in an August 2003 e-mail to agency officials, one of several reviewed by the AJC.

CDC officials have said that despite West's concerns, the consensus of experts was that a centralized generator farm was better than having individual units at buildings.

Skinner emphasized that the CDC has many other physical barriers to contain germs that don't require electricity.

"I think people need to know we're talking about an enormous campus with complex systems, and we're never going to be able to fully eliminate power outages," Skinner said. "That's impossible. The key for us is to minimize the duration of the outage."

To reach staff writer Alison Young, call 404-526-7372.

**RECENT LAB INCIDENTS**

MAY 18, 2007: Blasting of granite by a CDC construction contractor sent rock flying, shattering two exterior windows in Building 15, including one on a floor 150 feet away from a maximum-containment Biosafety Level 4 (BSL-4) lab that works with deadly germs such as Ebola. Rocks also damaged windows at Building 17, about 50 feet away from a high-containment Biosafety Level 3 (BSL-3) lab.

MAY 25, 2007: Nine workers were tested for possible exposure to Q fever, a bioterror agent, after a ventilation system in Building 18 malfunctioned and pulled potentially contaminated air into a "clean" corridor. Nobody was

## Thrasher, III, Grady

## Page 4 of 4

## WD0055

infected. Duct tape now seals the Q fever BSL-3 lab door in what the CDC says is an added precaution until a new door is installed.

JUNE 15, 2007: A lightning strike knocked out power for an hour at Building 18; backup generators did not come on. Nearby construction work had damaged a key component of the building's grounding system.

DEC. 8, 2007: During a planned evacuation drill of Building 18's labs that was designed to simulate a power outage, emergency lights initially came on but failed after 10 minutes when a technician inadvertently shut off a back-up power system, according to a CDC after-action report obtained by the AJC.

DEC. 18, 2007: Building 18 had a real evacuation after its new medical waste incinerator was started for a test and vented smoke into the high-containment lab area. Excessive heat caused the incinerator's bypass stack to tear away from its anchor bolts, internal records show.

FRIDAY: A bird caused a Georgia Power transformer to fail, knocking out power to part of the CDC campus for about 1 hour and 15 minutes. Then CDC's backup generators failed to keep power on at four buildings: the infectious disease lab Building 17, and offices in Buildings 1, 3 and 20.

SHANNON PEAVY / Staff POWER OUTAGES AT THE CDC A key lab building and three office buildings lost power for more than an hour Friday. Last summer a different lab building had an hour-long power outage. Map locates buildings affected by power outage Friday and building affected by outage on June 15, 2007. Map shows which buildings are infectious disease labs and which are office buildings. Inset map outlines area of detail in DeKalb County relative to metro Atlanta. Sources: CDC, AJC research

Thrasher, III, Grady

Page 1 of 6

WD0054

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**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Sunday, July 13, 2008 9:52 AM  
**To:** NBAFProgramManager  
**Subject:** Emailing: OnlineAthens.com Opinion NBAF isn't best idea for development 07-13-08  
**Attachments:** OnlineAthens.com Opinion NBAF isn't best idea for development 07-13-08.htm

1|27.0 | Please add the attached Athens Banner-Herald article to the scoping comments  
| re the prospect of NBAF in Athens, GA.

Be sure to include the email comments attached to the article. Thanks.

Comment No: 1      Issue Code: 27.0  
DHS notes the information submitted by the commentor.

Thrasher, III, Grady

Page 2 of 6

WD0054

[http://onlineathens.com/stories/071308/opinion\\_2008071300538.shtml](http://onlineathens.com/stories/071308/opinion_2008071300538.shtml)

# OnlineAthens

**Opinion**

## NBAF isn't best idea for development

### Forum

By Matt DeGennaro | Commentary | Story updated at 4:59 PM on Sunday, July 13, 2008

The Department of Homeland Security has issued the 1,000-page Draft Environmental Impact Statement for the National Bio- and Agro-Defense Facility, for which Athens-Clarke County remains on the short list. If you read the headlines in local media - "Risk from biolab nil, feds claim," "Government study says NBAF safe" - you'd think everything was A-OK. If you read just the executive summary of the DEIS, you'll find a paragraph that says "potential adverse effects" range from "negligible" to "moderate," while "potential beneficial effects" are "significant."

But if you read the entire draft, you might be surprised to find some things you didn't know about NBAF, and question whether it's really such a great idea.

We heard the site selection process for NBAF was going to be transparent. The lab would fight poverty by providing Athenians lots of jobs. It's going to be safe. When the recent foot-and-mouth disease outbreak in England was discussed, we were told not to worry. That was from a vaccine manufacturing plant. To produce vaccines, one needs more than just the "teaspoon-sized" amounts that NBAF would study, we were told.

But, the DEIS tells a different story. NBAF will house a "laboratory for small-scale vaccine and reagent production ... with a BSL-3 Enhanced Viral Production Area ... ." So it looks like NBAF will be manufacturing some vaccines, storing considerably more pathogen than "teaspoon-sized amounts." According to the DEIS, "the largest scale envisioned for manufacturing needs in this facility is 30L - 50L." That's liters vs. teaspoons.

Then there's the bugs, or rather the "vectors." In the DEIS we learn NBAF will have its own "insectary" to keep "infected live insects or arthropods for virus transmission studies to and from both infected and non-infected large animals and small animals." Insects like mosquitoes and ticks, subject to escape, which - due to our warm climate - would be a big problem. According to the DEIS, "establishment of infected mosquitoes in one of the southeastern sites could lead to a more rapid dispersal of the disease to larger human populations such as in the Atlanta or San Antonio areas and ultimately lead to a permanent reservoir of virus."

The Department of Homeland Security has recognized we are in a severe drought, but this still hasn't eliminated Athens as a potential NBAF site. In fact, NBAF's original estimate of using 21 million to 32 million gallons of water per year has turned into a 43-million-gallon estimate.

And all those jobs NBAF supporters strongly implied would go to the poor? First, we heard NBAF would employ 500, then 250 to 350, with "many" jobs staffed locally. Finally, in the DEIS we read, "NBAF would directly employ 326 people. The majority of these employees would be research scientists and other

## Thrasher, III, Grady

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WD0054

specialized staff, and based on census journey-to-work data, 257 would be expected to relocate to the study area from elsewhere in the country."

This would leave Athens with 69 permanent positions to fill. About the same as a couple of fast-food joints and a muffler shop.

A lot has happened since the DHS came to town in February. There was talk of a secret \$21 million incentive package offered by Georgia officials. We learned no details of a needed "central utilities node" at the NBAF site; University of Georgia Vice President for Research David Lee told us he was not obligated to release information that may put us at a competitive disadvantage.

And, just a few months ago, the Government Accountability Office, investigating whether it would be safe to move foot-and-mouth disease research from a federal facility on Plum Island, N.Y., found "DHS has not conducted or commissioned any study to determine whether FMD work can be done safely on the U.S. mainland." It also found that "given that releases can occur from any biocontainment facility, an island location can provide additional protection." DHS seems to reach the same conclusion. The DEIS says "with the exception of Plum Island, each of the proposed sites resides in an area where the wildlife, vegetation, agriculture, and human populations provide ample opportunity for each of the viruses to become established and spread rapidly once released from NBAF."

The GAO findings aren't anywhere in the DEIS. The NBAF site selection process has never been driven by safety first. The DHS threw a big shiny, disease-ridden ball in the air to see which town would jump highest to catch it. Neither DHS, UGA nor our local elected officials will ever take off their blinders and see the risks of this project; they will just continue to talk about the "perfect fit," the economic benefits, the prestige.

You can prevent NBAF from forever changing the face of Athens, and the time to do so is now. The DEIS says some of the original applicants were eliminated because of "weaknesses or deficiencies" including "insufficient community support." Send your comments to [nbaflprogrammanager@dhs.gov](mailto:nbaflprogrammanager@dhs.gov) before Aug. 25. Go to one of the Aug. 14 meetings at the Georgia Center for Continuing Education and speak out. Politics, prestige and pandering should take a back seat to our community's safety and unique character. If we don't continue to shout "no" to NBAF, come December the DHS may say "yes" to Athens.

• *Matt DeGennaro is a local freelance writer who lives near the South Milledge Avenue site proposed for NBAF.*

Published in the Athens Banner-Herald on 071308

**COMMENTS**

Just what Athens needs, to become a terrorist target!  
Sunday, July 13, 2008

Bernard  
Sunday, July 13, 2008

You better believe this will put Athens on the map...IN A BIG BAD WAY. NBAF will be the largest germ structure in the world and the terrorist will know it.

You can strike off tourism in Athens. You can strike off retirement in Athens. You can strike off large manufacturing companies in Athens. (They are not going to bring their employees to Germ Town.) And for UGA students, what parent in their right mind would send their precious child to live on The New Plum Island.

Hopefully Matt DeGennaro sent this letter to Atlanta Journal and other newspapers through out Georgia, because this bio-terror lab will affect our entire State for the worse.  
Sunday, July 13, 2008

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This will not make Athens any more of a "terrorist target" than it already is with 90,000 football fans on a Saturday afternoon.

Just got off the turnip truck?

Sunday, July 13, 2008

Nope. Just know what I'd attack if I were a terrorist!

Sunday, July 13, 2008

oops, a scientist made an error...glad it was just spelling.

Sunday, July 13, 2008

Nope, was trying to do my W. impression via blog. Guess you don't have a sense of humor :-)

Sunday, July 13, 2008

Bad try.

Sunday, July 13, 2008

Well get yourself a sense of humor, then.

Monday, July 14, 2008

Try reading the article before commenting!

Sunday, July 13, 2008

I did, thanks.

Sunday, July 13, 2008

Then try comprehending the article before commenting!

Sunday, July 13, 2008

I did, thanks.

Sunday, July 13, 2008

You left the same comment last week. Wake up and smell the roses. (oops..the infected cow sh\*t.) **There are** stadiums all across the country, but only one NBAF.

Sunday, July 13, 2008

Actually, not me -- but I agree w/ whoever did.

Sunday, July 13, 2008

Sir Walter Scott  
Sunday, July 13, 2008

Pres. Adams & Dr. Lee:

Oh what a tangled web we weave, When first we practice to deceive.

Sunday, July 13, 2008

Excellent Forum! Thanks, Matt, for helping the community understand what a bad idea NBAF is for Athens.

Sunday, July 13, 2008

FACT FINDER  
Sunday, July 13, 2008

"Insectary"

Let me tell you about Rift Valley Fever.

Quote from DEIS: " The warm climate and aquatic habitat suitable for anthropod vectors (mosquito, flea, tick, flies etc.) would increase the likelihood that the RVF (Rift Valley Fever) would establish a sustainable reservoir."

CDC: Humans usually get RVF through bites from infected mosquitoes and possibly other biting insects that have virus-contaminated mouthparts. There is no established course of treatment for patients infected with RVF virus. Studies have shown that sleeping outdoors at night in geographical regions where outbreaks occur could be a risk factor for exposure to mosquito and other insect vectors.

UGA VET: Humans are highly susceptible to RVF virus infection and are readily infected by mosquitoes and aerosols. Humans develop a sufficient viremia to be a source of infection for mosquitoes and thus could introduce the disease into uninfected areas. In humans, the incubation period is 4 to 6 days.

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## Communicability

Virus titers in infected humans are high enough to infect mosquitoes and introduce Rift Valley fever into new areas. Virus can be found in the blood and tissues.  
<http://www.state.nj.us/agriculture/divisions/ah/diseases/riftvalley.html>

This alone should keep NBAF out of ATHENS.

FACT FINDER  
 Sunday, July 13, 2008

Sorry, UGA VET link is:  
[http://www.vet.uga.edu/VPP/gray\\_book02/fad/rvf.php](http://www.vet.uga.edu/VPP/gray_book02/fad/rvf.php)

sammy  
 Sunday, July 13, 2008

the NBAF should not be allowed to come to athens!

UGA and the USDA should also be moved because they research deadly human diseases.

No More Chains, Please  
 Sunday, July 13, 2008

When there is such a strong reaction to an invasive development within a community it is obvious that this development is not wanted. Should the Bio plant be installed here it is true that the quality of life will decrease for all the obvious reasons stated.

I heart Burritos  
 Sunday, July 13, 2008

"Well," the King said. "What makes you think the sky is falling?"

"Ducky Lucky told me," said Goosey Loosey.

"Cocky Locky told me," said Ducky Lucky.

"Henny Penny told me," said Cocky Locky.

"Chicken Little told me," said Henny Penny.

"It's true," said Chicken Little. "I was there. I saw the sky. I felt it hit my tail."

"Silly Chicken Little," said the King as he reached into Chicken Little's tail. "It was only an NBAF acorn. It was there all along and you never even noticed it."

They all had a good laugh.

Chicken Little later died from a mysterious animal pathogen, and Matt DeGennaro felt vindicated.

Sunday, July 13, 2008

Cary, now your stupidity is showing.

No Head In Sand  
 Sunday, July 13, 2008

It'd be nice if none of these existed and studying them was unnecessary. On the other hand, in human health, life expectancy is much greater and so is quality of life because scientists studied and understood the organisms and then came up with vaccines or treatments. The same thing can be said about the maladies NBAF will study. Yes, there is risk, but it can be managed successfully and the track record of safety, though not perfect, is an historical fact. The U.S. and Georgia ought to embrace the challenge and master it. If not, the situation re the food supply and human health will be much more risky and prone to devastating pandemics and associated food shortages.

Anne  
 Sunday, July 13, 2008

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Scare tactics. And Iraq had nuclear weapons.

You are correct about one thing. Yes, there is risk and that risk should not be taken in Athens, GA.

No, the food supply & human health will NOT be much more risky, with pandemics & food shortages, if Georgia does not embrace the challenge. This work can be done on Plum Island, away from where people live and with prevailing winds flowing to the Atlantic Ocean.

People are not going to believe your scare tactics, just to accommodate cheap housing and easy transportation for a couple hundred scientists.

Historical fact regarding track record of safety is a bunch of bull. So many of the accidents are not reported until someone gets caught or a snitch tells. To me integrity is just as important as extended life.

"And Iraq had nuclear weapons."

Sunday, July 13, 2008

Er, actually it didn't.

Sunday, July 13, 2008

You didn't get the sarcastic remark.

Monday, July 14, 2008

Actually, I did. The same kinds of tactics used by Bush and crew are being used by anti-NBAFers.

Sunday, July 13, 2008

"You are correct about one thing. Yes, there is risk and that risk should not be taken in Athens, GA."

So, you want the benefits of the research but none of the "risks"? There are plenty of people who live by Plum Island, btw.

Like this comment? [vsa](#) [trp](#)

Sunday, July 13, 2008

People do NOT live on Plum Island. The island is over 800 acres and no one lives there. Don't try to mislead folks.  
]

Monday, July 14, 2008

It's right next door to Long Island!

Buther  
Sunday, July 13, 2008

Note to the NBAF cheerleaders: With the incident record the CDC is building, it is time you back off the CDC comparison. Most people didn't fall for the "look how safe the CDC is" comparison the first time but with this latest in a string of incidents a case is being build for just how risky these labs are. Moreover, the comparison is moot, since the NBAF is the first of its kind there is no precedent for comparison. These incidents at the CDC prove there is just cause to be concerned about these facilities operations.

Thrasher, III, Kathy Prescott and Grady

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**From:** Grady Thrasher, III [REDACTED]  
**Sent:** Monday, July 28, 2008 10:46 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
NBAFProgramManager  
**Subject:** FAQinc letter re NBAF DEIS  
**Attachments:** FAQinc2 Letter to Heidi updated July 19, 2008.doc

Heidi,

Since the scoping meetings are only about two weeks away, the answers to the questions raised in our letter to you dated July 11 are becoming more and more critical. Since we haven't heard from you and now find you will be out of the office for a week, we believe it is necessary to include the other ACC Commissioners as well as the Oconee County Commissioners in our inquiry.

1| 25.2 | We trust the ACC government will act in the best interests of community awareness and make public what position each of the Commissioners will take regarding NBAF and the issues raised by the DEIS prior to August 14.

Best regards,

Kathy Prescott and Grady Thrasher  
For Athens Quality-of-life  
[www.athensfaq.org](http://www.athensfaq.org)

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

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FAQinc. "For Athens Quality-of-life"  
196 Alps Road, Suite 2, Box 205  
Athens, Georgia 30606  
[www.athensfaq.org](http://www.athensfaq.org)

July 11, 2008 (updated July 28, 2008)

Mayor Heidi Davison  
235 Wells Drive  
Athens, Georgia 30606

Dear Heidi,

We trust you are doing well and that among the many important issues you deal with every day as our Mayor, you are staying tuned to the continuing NBAF saga.

As you know, the Department of Homeland Security recently released its draft Environmental Impact Statement for comment during the 60 day "on the record Scoping Period" which ends August 25, 2008. We needn't remind you that DHS will be in Athens on August 14, 2008 for two public meetings to receive citizen (and institutional) questions, concerns and commentary on risks and environmental degradation associated with the proposed NBAF being built and operated next to our State Botanical Garden.

FAQinc. "For Athens Quality-of-life" is engaged (through its citizen-supporters as well as hired professionals) in deciphering and interpreting the massive, often dense and sometimes contradictory DEIS with a goal of explaining to our community how, if at all, the DEIS answers those many questions of concern to Athenians and residents of surrounding communities.

Given that the DEIS contains a thousand or so pages of information, it is easy to be seduced by its Executive Summary and over-simplified charts such as the "Comparison of Environmental Effects" (Table ES3). That summary and those charts tend to mislead rather than inform because they gloss over and in many cases *contradict*, important details contained in the body and appendices of the DEIS. ***In assessing community health and safety the summary statements provided are completely inconsistent with***

## Thrasher, III, Kathy Prescott and Grady

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*the facts and conclusions admitted to in the broader text.* We raised this important issue at the DHS Scoping Meeting in Washington, DC on July 24. After the meeting, representatives of Dial Cordy made a special effort to acknowledge their concerns with the Executive Summary and summary charts in the EIS and to assure us that the misrepresentations would be corrected in the final EIS. But the real concerns raised in the body and appendices of the DEIS need to be examined carefully and candidly now, before the Athens Scoping Meetings scheduled for August 14.

In any event, we at FAQ intend to do our part to help inform and advise the citizenry of Athens/ Clarke, Oconee and adjacent counties regarding the DEIS and the need for citizen input. But we still look to the ACC government as the ultimate protector of our community's public health, safety and welfare. In this regard we at FAQ have several questions we hope you will help us answer regarding the NBAF site selection process. They are:

(1) Since we all now have an abundance of new information with which to evaluate NBAF (whether revealed by Congressional inquiry, the Associated Press, contained in the DEIS or now revealed in the NBAF Feasibility Study just obtained through the Freedom of Information Act), what role will the ACC government play in interpreting, vetting and verifying all this new information so that appropriate questions and comments can be raised and made to DHS during the NEPA mandated Scoping Period and at the Athens scoping meetings scheduled for August 14? Will you attend the meetings and give comments? If so, will you be acting in your official capacity as Mayor or as an individual? If in your official capacity, will you seek official action by the ACC Commissioners before making representations regarding the position of the ACC government? Will you make it clear to DHS in which capacity you will be speaking?

(2) If the ACC government chooses not to take a proactive role in the NBAF site selection process, on whose advice or recommendation will you and the ACC Commissioners rely with regard to the information presented in the DEIS that involves providing infrastructure and related services (such as water, sewer and traffic abatement), all of which may require effort and expenditure by the ACC government?

(3) On issues regarding public health and safety as presented in the DEIS (deemed "moderate" in the full text, but shown as "insignificant" in the

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disingenuous Executive Summary, on whose advice or recommendation will you and the ACC Commissioners rely in determining whether to support, oppose or question the information, conclusions or deferred decisions discussed (or, in some cases, avoided) in the DEIS?

Some information contained in the DEIS not previously in the public sphere of knowledge about NBAF includes (this list is by no means all-inclusive):

(1) **DHS concedes the safest location for NBAF (among the six sites in contention) would be Plum Island.** This determination alone should end the competition—but it hasn't.

(2) **DHS leaves open the question of whether NBAF will use incineration as its primary pathological waste (infected carcasses) disposal method.** This raises and leaves unanswered air quality questions in the face of previous assurances from UGA and DHS that NBAF would be a "green" non-polluting industry. The DEIS discloses that NBAF, if incineration is used for carcass disposal, would be a "major Title V emission source" requiring permitting from local and state authorities.

(3) **The average projected daily water usage at NBAF has doubled to over 117,000 gallons per day in contrast to the DHS representatives' assurances during the DHS "town meeting" held in May of less than half that amount.** The usage could go as high as 275,000 gpd during our hot, dry summer months, coinciding with the times our water sources are most vulnerable to drought.

(4) **Contrary to misinformation given by Dr. Larry Barrett (representing DHS at the Athens town meeting), all of the zoonotic diseases to be studied at NBAF are transmitted by aerosol or airborne means, and there have been instances where Nipah virus has spread from human to human.**

(5) **NBAF will have an "Insectary", a breeding facility for mosquitoes and other insect carriers of the studied pathogens such as Rift Valley fever, a disease that can be spread to humans.**

(6) **Contrary to DHS misinformation provided at the town meeting, NBAF will study the effects of pathogens on large herds of large animals--not small groups of small animals, thereby creating an**

## Thrasher, III, Kathy Prescott and Grady

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**unprecedented bio-hazardous waste disposal challenge for Athens, the effective handling of which is still undetermined.**

**(7) As revealed by the Government Accountability Office in May and admitted by DHS in the DEIS, accidents in bio-containment labs do happen—frequently.** Most, if not all, result from human error or malfeasance. According to the GAO, technology cannot save us from our own failings. An accident involving Foot and Mouth virus could have a staggering economic downside measured in billions of dollars. The virus, which is possibly the world's most contagious, is carried on workers' breaths, in their throats, nasal passages and under their fingernails, among other areas. Deer and other wildlife are susceptible, not just cows, pigs and horses. The custodial workers will have daily contact with infected animals spewing virus from all of their orifices. It would seem only a matter of time before the virus, by accident or design, found its way into our receptive environment.

**(8) The DEIS admits to environmental degradation during NBAF construction, a period of time estimated to last at least four years,** but likely much longer if UGA's Animal Health and Research Center, which took more than 12 years to build at three times its initial budget to and is just now achieving full certification, is any example.

**(9) The DEIS acknowledges noise, visual and light pollution affecting visitors to the State Botanical Garden, but dismisses NBAF's effect on the Important Bird Area joining the Botanical Garden with Whitehall Forest because the proposed NBAF site in the middle of the IBA is "mostly pasture".**

**(10) The DEIS acknowledges NBAF will aggravate traffic congestion on South Milledge and Whitehall.**

**(11) The DEIS does not adequately take into account NBAF's dramatic effect on nearby neighborhoods in Clarke and Oconee County, although it admits to a 6.5 mile radius "infection zone" if there is a pathogen release. This zone includes about 50,000 people—90,000 more on Game Day.**

It is clear that an NBAF at the offered location in Athens would bring real public health and economic risks plus environmental degradation, as now

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revealed by the DEIS and the GAO. Further, the DEIS leaves open questions of local government responsibility and cost yet to be answered or even fully examined. **But the bottom line is the certainty that NBAF in Athens would in many ways adversely compromise the quality of life in our community. The DEIS admits that a pathogen outbreak or release would have a devastating effect on the public health, safety and economy of our entire region.** This is not a risk our civic leaders need to casually assume for our community.

FAQ represents thousands of Athenians who are opposed to NBAF. Almost 2000 brave citizens have signed our "No NBAF" petition and many more have voiced their support of and appreciation for FAQ's opposition to NBAF. **Whether you agree with FAQ or not, we believe all Athenians deserve a fair, critical and impartial inquiry by our elected representatives into the issues raised or avoided by the DEIS. The ACC government should rely on advice from disinterested parties, not ones affiliated with the University of Georgia, the lead proponent of NBAF in Athens. The UGA administration has demonstrated disingenuousness from the beginning in its advocacy of NBAF and has in many cases used its economic influence over employees and affiliates to dampen local opposition. In the interest of the entire community the results of your independent inquiry should be made public prior to the Scoping meetings on August 14.**

We thank you for your attention to this critical situation, and we look forward to hearing from you at your earliest opportunity.

Best regards,

Kathy Prescott and Grady Thrasher  
for FAQ "For Athens Quality-of-life"

Tiffany, Christopher

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WD0806

**From:** [REDACTED]  
**Sent:** Monday, August 25, 2008 5:14 PM  
**To:** NBAFProgramManager  
**Subject:** NoBioweapons in NC (see <http://tinyURL.com/Lab257> )  
**Attachments:** NoBioweapons in NC.pdf

**cc: David Price, Chairman of the Homeland Security Appropriations Committee**

----- Forwarded Message -----

[REDACTED]  
 Sent: Saturday, August 23, 2008 2:19:43 PM  
 Subject: NoBioweapons in NC!

- 1| 5.3 | **For all of the reasons below, and many more (see attached), NBAF should \*NOT\* be built in North Carolina.**
- Rejected sites had "Strong community opposition"  
 The Butner NC site? Strong community opposition (including vows to sabotage)
- 2| 5.0 | **Leavenworth rejected: "near federal prison, which could cause security problems" and the Butner NC site? near federal prison, which could cause security problems.**
- 3| 12.3 | **---Rejected site(s) had creeks intersecting the sites the Butner, N.C. site? creeks intersecting the site.**
- 4| 8.3 | **Rejected site(s) had problems with sewer service; Butner N.C. has had problems with sewer service.**
- 5| 21.3 | **Rejected site(s) near wetlands; Butner, N.C. is near wetland/mosquito-breeding sites. see [tinyURL.com/NBAF-NC](http://tinyURL.com/NBAF-NC)**
- 6| 20.3 | **Rejected site(s) had "issues of 'environmental justice';" Butner, has a major issue with environmental justice, because of the THOUSANDS of adult and teenaged prisoners and mental patients, and autistic children, most of whom are ethnic minorities &/or from poverty (i.e. "Low-Class") -- see [tinyURL.com/DurhamNews](http://tinyURL.com/DurhamNews)**

Comment No: 1                      Issue Code: 5.3

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

Comment No: 2                      Issue Code: 5.0

DHS notes the commentor's statement regarding security.

Comment No: 3                      Issue Code: 12.3

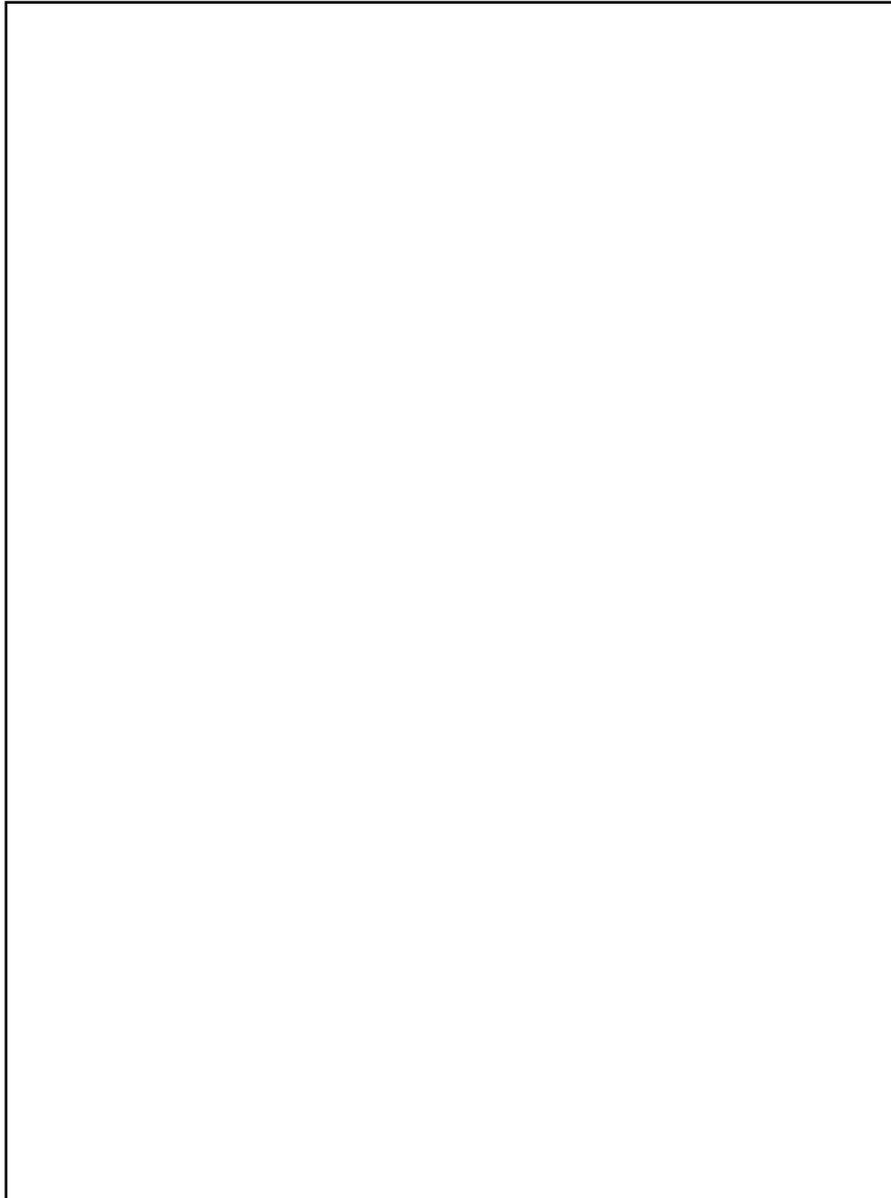
DHS notes the commentor's surface water concerns. The NBAF EIS Section 3.7.7 describes the water resources at the Umstead Research Farm Site alternative and the proposed NBAF's potential construction and operational consequences. Once a final site is selected and facility designs completed, additional emphasis will be placed on avoidance, minimization and if need mitigation to lessen potential surface water consequences.

Comment No: 4                      Issue Code: 8.3

DHS notes the commentor's concern. The impact from the proposed operation of the NBAF at the Umstead Research Farm Site Alternative on the local sanitary sewage system capacity and infrastructure is discussed in Section 3.3.7 of the NBAF EIS.

Comment No: 5                      Issue Code: 21.3

DHS notes the commentor's concerns regarding an accidental release of pathogen from the NBAF, the establishment of that pathogen in native wildlife or vectors such as mosquitoes, and the potential need to eradicate the vectors through aerial spraying. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections, vector escape and accidental releases. A discussion of insectary operations is contained in Chapter 2, Section 2.2.1 and elsewhere in the NBAF EIS. Chapter 2, Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, also provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. In addition, information has been added to Chapter 2 regarding operations and containment of arthropod vectors. Chapter 3, Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. In addition, oversight of NBAF operations, as described in Chapter 2, Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the Animal Research Policy and Institutional Animal Care



and Use Committee (APHIS). An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the Umstead Research Farm Site is specifically addressed in Chapter 3, Section 3.8.9 and Section 3.10.9.5 as well as in Section 3.14.4.5 (Health and Safety). Section 3.10.9.5 discusses the relative suitability of the regional climate of the Umstead Research Farm Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.7.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Comment No: 6

Issue Code: 20.3

DHS notes the commentor's concern. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the Draft EIS. The risks were determined to be low for all site alternatives. An analysis was conducted to determine if the proposed project alternatives would have a disproportionately high and adverse impact on low income or minority populations under normal operations for the Umstead Research Farm Site Alternative. The analysis determined that there could be effects on visual resources and transportation activities on these populations.

Tiffany, Christopher

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-- mostly Black captives as human guinea pigs  
for biological weapons research?

6 cont. | The North Carolina site clearly makes that an attractive option.  
20.3 | for example [tinyURL.com/Medical Apartheid](http://tinyURL.com/MedicalApartheid)

( See <http://NoBio.org/html/reports.html> )  
( see [tinyURL.com/Lab257](http://tinyURL.com/Lab257) )

**(GOOGLE search: "Medical Apartheid" mosquitoes)**

1 cont. | For all of the above reasons, and many more (see attached),  
5.3 | NBAF should \*NOT\* be built in North Carolina.

Chris Tiffany,



PLEASE MAKE SURE THIS e-MAIL,  
INCLUDING THE ATTACHMENT, IS ROUTED TO  
DAVID PRICE, CHAIRMAN OF THE HOMELAND SECURITY  
APPROPRIATIONS COMMITTEE!!

Tiffany, Christopher

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page 1 of 2. Post or pass on the following simple message; make sure as many people as possible know what to do to  
**Help stop NBAF/nc; Click the Petition Link at [NoBio.ORG](http://NoBio.ORG)**

# Click Petition @ [NoBio.ORG](http://NoBio.ORG)

[tinyURL.com/Lab257](http://tinyURL.com/Lab257)



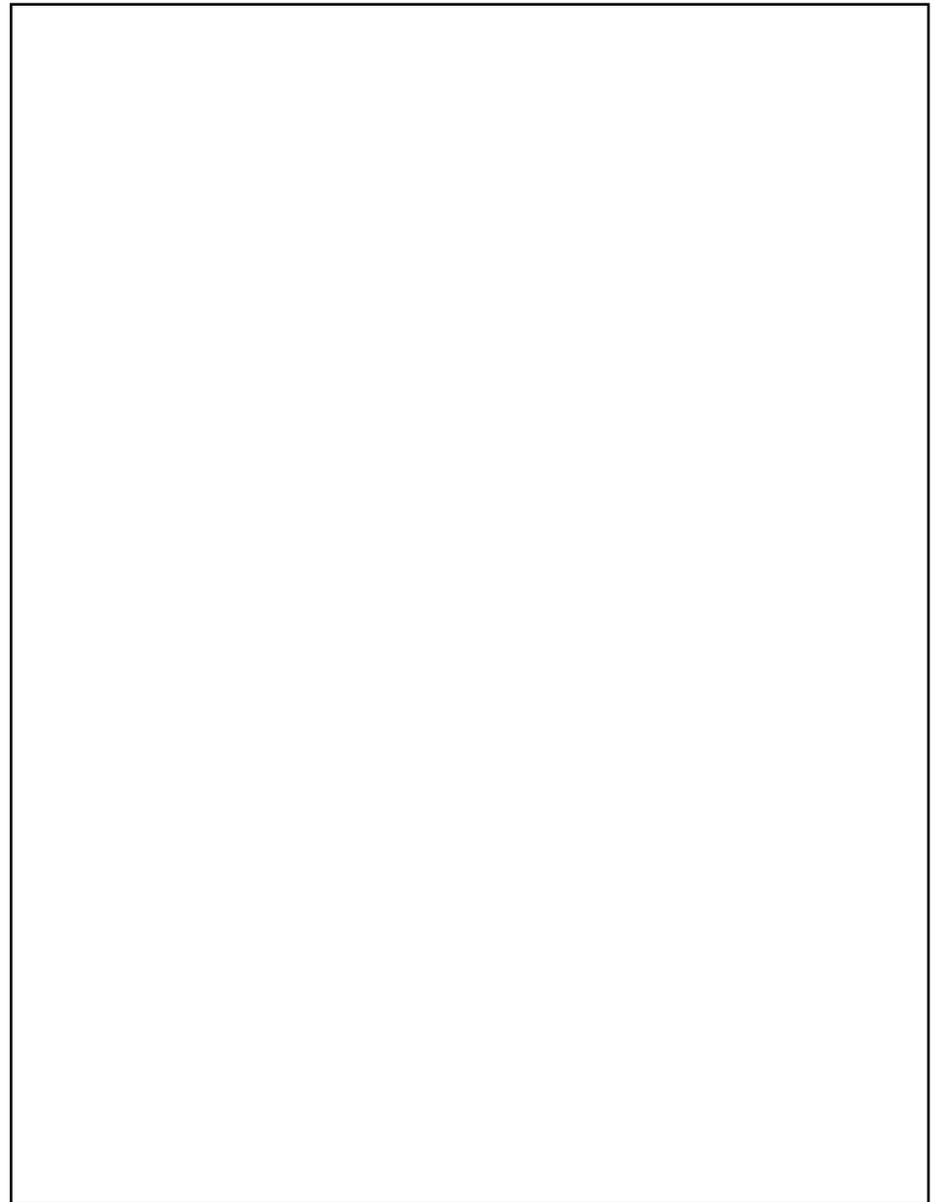
Where??  
666yds from Lake Michie  
(water supply for Durham)  
for google map, type:  
[tinyURL.com/NBAF-NC](http://tinyURL.com/NBAF-NC)

[tinyurl.com/DurhamNews](http://tinyurl.com/DurhamNews) [tinyurl.com/BioHazard](http://tinyurl.com/BioHazard)  
[tinyURL.com/Lab257](http://tinyURL.com/Lab257)

They're ***HERE...***

Flip side 2:  
info flyer

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Tiffany, Christopher

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WD0806

NBAF-Durham meeting: 2008-08-11 (Monday) 200 East Main Street, Durham, NC 2<sup>nd</sup> Floor  
 Where is this proposed NC Bio-weapons site? In Butner, just a stone's throw from Lake Michie (water supply for Durham; Butner 'butts' across the Durham County Line up to Cassam Road, which runs along the shore of Lake Michie). They propose to use 40 million gallons of water per year if they build a BioWeapons lab here. 5 reservoirs are within 5 miles of this proposed BioWeapons R&D Lab site &/or sewage treatment plant which cannot even handle the sewage it gets now: Falls Lake, Lake Holt, Little-River Reservoir, the GreedMore Reservoir, and Lake Michie (Durham).  
 This proposed site (which plans to grow diseased mosquitoes & ticks) is also near the River ENO (-bzzz!) Shipments of viruses & infected tissues would be sent to & from the lab over the roads through Durham & Granville to-&-from the Raleigh-Durham international airport (RDU). Granville activists have vowed criminal sabotage and vehicle attacks if they build a bioweapons lab here, and the audience applauded!  
 The most dangerous domestic bio-terrorists have been associated with both of the labs associated with the Plum Island site bio-weapons funders want to replace. One outbreak caused by foot-&-mouth virus stolen from 1 of those 2 labs cost AT LEAST \$16 billion dollars and the 2001 anthrax attack by a bio-weapons scientist at the Army's Fort Detrick generated a billion-dollar contract for a vaccine he was developing (the contract was cancelled). Both outbreaks were deliberate criminal acts.  
 Do you want some Durhamite to infect his or her boyfriend, girlfriend, spouse (or, like the bio-weapons sociopath) sending killer pathogenic bio-hate mail to [local] public figures? I assume you know animal cruelty is associated with sociopathy. When I worked for the largest microbiological diagnostics company in the world outside the Soviet Union, one of my bosses complained about monkey bites, & killed goats that didn't die from anthrax experiments performed for the military, by injecting a painful poison and hearing them scream; another bragged about staking out rabbits and taking blood by stabbing them in the heart without anaesthetic or sedatives and making them scream. Such sociopaths endangered many people. Among the most formative events of my life was when they shipped thousands of willfully functionally defective micro-biological culture tubes to the military (false negative/failure to detect means failure to treat, but a DOD analyst shrugged it off).  
 When 17/25 employees (¾) handling human blood came down with hepatitis, it was said they could have gotten it on the street. You can get away with such things, since it's so hard to prove responsibility when disease organisms are involved. I was enraged when one of my techs – a Black woman – was deliberately secretly exposed to live syphilis by another lab supervisor after the Tuskegee syphilis 'experiment' was closed down. I told a room full of managers that they could go to prison for many of the things that went on there, & was nearly fired for flatly refusing to falsify records. When I visited the farm, I saw them bleed sheep with diseased feet & faces, gasping for breath, & they often shipped us diseased blood.  
When I visited Fort Detrick, I wandered around unescorted, watching people work in moon-suits with air hoses, and smelled the stink of animal waste waiting to be autoclaved, wondering about air-pressure differentials and air filters, & what kind of security system lets visitors wander around a facility with Ebola and Rift Valley Fever? When someone asked what NBAF jobs were available for locals, he said you could apply for a job as a janitor, but they'll need guards and filter-maintenance people and animal, food & waste handlers, and butchers, too, just as prisoners & mental patients & autistic kids surrounding the proposed lab need janitors, they also need "janitors" (etc), some from Durham (thousands of prisoners surrounding this proposed site are in Durham, despite Butner mailing addresses), and the Federal Medical Center in Durham is where sick prisoners go for treatment. The worst of the diseases that NBAF proponents have admitted to bringing is Rift Valley Fever abortion Virus, a hemorrhagic disease WORSE than EBOLA (RVF virus can become endemic, & is spread by air & by mosquitoes). RVF virus has been weaponized by Army colleagues of the Fort Detrick anthrax killer by growing it in fetal lung tissue. (see [tinyurl.com/Lab257](http://tinyurl.com/Lab257)) After infecting animals, they will be carved up and either flushed down the sewer or sent up the smokestacks. At Plum Island, ashes & other waste went out to sea; when they neglected to cook the sewage (oops!) they just flushed it into the ocean, but here, neglecting to cook the sewage could have dire consequences.  
Outbreak response at Plum Island involved killing every animal there, but here, they can't kill all the squirrels, deer, lice, mice, rats, bats, birds, mosquitoes, ticks (or animal infectors & butchers) here. For more, see: [tinyurl.com/DurhamNews](http://tinyurl.com/DurhamNews), [tinyurl.com/BioHazard](http://tinyurl.com/BioHazard), and go to [NoBio.ORG](http://NoBio.ORG) & [click Maps](#), [FAQs](#), and [Petition](#) and click Lab 257 (a book about safety problems at "the safest virus lab in the world" – e.g.: West Nile) also ([Google search: "Medical Apartheid" mosquitoes](#))

Click [Petition](#) at [NoBio.ORG](#)

Tiffany, Christopher

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WD0806

**Have you been bitten by a mosquito this year?****Maybe you were infected with the West Nile Virus (arguably from Al Qaeda target Lab 257)**

Many bio-weapons agents, like yellow fever & dengue, hemorrhagic fever viruses used by US para-military agents to infect African Americans ([Google search: "Medical Apartheid" mosquitoes](#)) can be spread by mosquitoes & "ALL of the classical and modern biological weapons agents are (or were) animal diseases." According to the NBAF Path(ogens) List, 'zoonotic' pathogens to be bred in order to infect experimental subjects [e.g. cattle & swine & probably **mostly** "non-Aryan" prisoners, as used by one of the Nazi founders of Army/'USDA' [Lab 257](#), [Erich Traub](#) & his American disciples], include:

Highly contagious Swine Fever Viruses, which, like Syphilis used in the infamous Tuskegee 'experiment' can infect the brain. Experiments with swine fever viruses indicate that animals other than pigs can be infected. **Symptoms include "sudden death with few prior signs."** **North Carolina with "the densest pig population in North America" (more pigs than people) & with various mosquitoes breeding most months of the year means North Carolina is THE most dangerous of the proposed sites to bring airborn & insect-spread disease agents which (like swine flu) can attack pigs &/or people; Japanese Encephalitis Virus is another contagion affecting the brain. Carried by mosquitoes, it also (like swine flu) kills pigs & people. The Japanese Encephalitis Virus "causes brain swelling (encephalitis), & may progress to paralysis, seizures, coma & death. **Approximately 1/3<sup>rd</sup> of human J.E.V. cases die** [a human death rate of 1/3 is described as only a "moderate" death rate] & **another 1/3 develop long-term neurologic disease.**"** Not only can Japanese Encephalitis be spread by **mosquitoes**, but [like West Nile Virus] it can also become endemic among birds [but more deadly to people].

FMD [[Foot-&-Mouth Disease](#)] virus "**the most infectious agent known to modern science**" can be carried by air for **40 miles or more (up to 100 miles)** ... **economic costs of an accidental outbreaks from the North Carolina site would be in the Billion\$ of dollars, "Kansas & North Carolina costs would be the largest."** [The release of FMD stolen from the U.K.'s Nat'l Bio-'Agro' Facility cost \\$16 Billion dollars](#) (more than the [USofA](#) & the [UofSA anthrax attacks](#)). **WORSE than FMD, the economic & human costs would be far greater for Rift Valley Fever Virus. Far more dangerous than the accidental (oops!) spread of West Nile Virus from New York (spread by mosquitoes & mosquito-infected birds) is the Rift Valley Fever Abortion Virus. Rift Valley Fever Virus (RVF), another disease carried by mosquitoes, "results in abortion of virtually 100% of fetuses & nearly that level of mortality in newborns & young. Often, an RVF outbreak is presaged by a sudden increase in unexplained abortions..."**

As the environmental impact study says: "this [the North Carolina site is] more prone to epidemic and endemic spread of Rift Valley Fever Virus than the other sites." **Durham**, with a population of about a quarter of a million, is **walking distance** from the Umstead site. In addition... other animals such as **squirrels and field mice** (like the birds that help maintain West Nile virus in the wild) could become viremic and help spread the **Rift Valley Fever Abortion Virus** [a genocidal bio-weapon for the tropics].

**Rift Valley Fever abortion virus**, like pneumonic plague, Foot-&-Mouth Disease, Anthrax & even Smallpox, can be spread by air, & "**with Rift Valley fever, there is a risk of its becoming established in the environment,**" **the proposed North Carolina site being more prone to epidemic and endemic spread of Rift Valley Fever [abortion] Virus than the other sites.**

**As has been said before, the other problem peculiar to the proposed North Carolina site is the fact that if built here, knowing our history & current secret abuse of prisoners, the entire WORLD will reasonably suspect that US para-military and other agencies will AGAIN be tempted to use adult & under-age mostly Black captives as human guinea pigs for biological weapons research. Why else would a Biological Weapons R&D Lab be built at the highest-risk site surrounded by thousands of mostly "non-Aryan" prisoners & mental patients? THAT is the feature peculiar to THIS particular site.**

[tinyurl.com/DurhamNews](#) Go to [NoBio.ORG](#) & Click [Petition](#) [tinyurl.com/NBAE-NC](#)

Tilley, Jay

Page 1 of 1

WD0475

**From:** Jay Tilley [jtilley@granvillecounty.com]  
**Sent:** Friday, August 22, 2008 11:00 AM  
**To:** nbafterprogrammanager@dhs.gov  
**Cc:** prtwinston@winstonele.com  
**Subject:** Public Comment in support of the Butner Site for NBAF  
**Importance:** High

August 22, 2008

Dear Mr. Johnson;

As the new Executive Director of Granville EDC, I was initially taken aback by the opposition to the proposed NBAF site for Butner, NC. However, it has not taken long to realize just how small the number of individuals expressing that opposition is. Even so, they have used fairly effective techniques (harassment, intimidation, half truths and complete lies—not to mention sympathizers who buy their ink by the 55 gallon drum) to make it appear that they represent most of Granville County's and indeed the entire state's opinions about NBAF, when in fact, they do not.

1| 24.3 Given the effectiveness of this opposition, the *easiest* thing to happen I suppose would be for another location to be chosen for this facility. However, the board that I represent (as well as many more reasonable thinking citizens) remains committed to the belief that Butner, NC is the *best* location for this project, and that a relative handful of overly zealot concerned citizens should not be allowed to sabotage our chances. Therefore, I will simply pledge to you as the Executive Director, that **the Granville Economic Development Commission will do everything within our power to assist with accomplishing this project's objectives if Butner is chosen.**

2| 8.3  
 1 cont. | There are, as the opposition points out, many unanswered questions concerning this project. Some of the issues raised are disconcerting and will require thorough attention; but none are "show-stopping" in my humble opinion. I look forward to the prospect of working with you and all of the necessary players to meet the concerns of the public in a way that relieves anxiety and enables NBAF to become what we expect it to be, a world class scientific research facility. And particularly, I look forward to realizing the incredible opportunity for economic development that NBAF holds for this rural portion of the Research Triangle Region.

Thank you for providing the opportunity for this comment.

Regards,

Jay Tilley  
 Executive Director,  
 Granville Economic Development Commission

919-693-5911  
 919-690-2822 (CELL)

jtilley@granvillecounty.com

Comment No: 1                      Issue Code: 24.3

DHS notes the commentor's support for the Umstead Research Farm Site Alternative. Community acceptance is only one of several factors that will affect the decision on whether or not the NBAF is built, and, if so, where. The decision will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in section 2.3.1 (includes community acceptance); 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.

Comment No: 2                      Issue Code: 8.3

DHS notes the commentor's statement.

Timmons, Barbara

Page 1 of 1

WD0172

**From:** info@athensfaq.org on behalf of Barbara Timmons [REDACTED]  
**Sent:** Monday, August 04, 2008 2:35 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Athens, Georgia

Dear NBAF Program Manger,

1| 25.2 I cannot support NBAF locating in Athens, Georgia without conclusive evidence there would be no environmental  
 2| 21.2 threat to our community; and, I'm not convinced that at some point in time we would not face some sort of tragedy,  
 which would greatly impact the quality of life for Athens' citizens.

Barbara Timmons

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. 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.

## Tippett, Phil

## Page 1 of 1

WD0232

**From:** Phil Tippett [REDACTED]  
**Sent:** Tuesday, August 12, 2008 1:13 PM  
**To:** nbafprogrammanager@dhs.gov  
**Subject:** In support of NBAF

Dear sirs/madams,

- 1|24.3 | This is just a brief note to show my support for the proposed bio defense lab in Granville County  
 | North Carolina. I live in Granville County and work as an auditor in Chapel Hill.
- 2|15.3 | As you must know, the area has been hard hit by economic woes in the past few years and is in  
 | need of new career opportunities. I do not know much about the activities that will occur at the  
 | proposed site, however, I do understand the economic impact that the site can have.
- 1 cont. | I urge you to seriously consider Granville County as the location for the NBAF site. You have  
 24.3 | my support.

Thank you for your time,

Philip Tippett  
 [REDACTED]

IRS Circular 230 Notice: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

[REDACTED]

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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: 15.3

DHS notes the commentor's support for the Umstead Research Farm Site Alternative. The economic effects of the NBAF at the Umstead Research Farm Site are included in Section 3.10.7 of the NBAF EIS.

**Titus, Ralph**

**Page 1 of 1**

PD0257

August 24, 2008

1|25.4 My name is Ralph Titus. I'm an emeritus professor at Kansas State University and a retired Colonel in the U.S. Air Force. I am adamantly opposed to siting the NBAF facility in Manhattan.

I believe that even though the danger is slight. It is still a danger and I don't want it in our community.

Thank you.

Comment No: 1

Issue Code: 25.4

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

Tolliver, Thomas

Page 1 of 1

Aug 22 08 07:05p Thomas C. Tolliver Jr.

601858E257

p.1

FD0048

THOMAS C. TOLLIVER, JR.  
CHANCERY CLERK  
P.O. BOX 516  
WOODVILLE, MISSISSIPPI 39669

To:

U. S. Department of Homeland Security  
Science and Technology Directorate  
Mr. James V. Johnson  
Mail Stop # 2100  
245 Murray Lane, SW  
Building 410  
Washington, D. C. 2058

Dear Sir:

1|24.5

Please be advised that as a citizen of the United States of America and the Great State of Mississippi I support 100% the location of Flora, Mississippi as the location of the Bio and Agro-Defense Facility. We have great educational institutions that are research intensive and a great quality of life in Mississippi. Therefore give this state the opportunity to prove to the world its greatness.

  
Thomas C. Tolliver, Jr. MPA, MCEM  
Chancery Clerk & Director of Emergency Management  
Wilkinson County  
Woodville, Mississippi 39669

Comment No: 1

Issue Code: 24.5

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

Toney, Angela

Page 1 of 1

WD0376

**From:** Angela Toney [REDACTED]  
**Sent:** Tuesday, August 19, 2008 5:36 PM  
**To:** NBAFProgramManager  
**Subject:** No Bio Lab in Butner, NC

1|25.3; Do not put this Bio Lab in Butner, NC. There are hospitals and institutions that could not be evacuated if  
 2|19.3; something were to happen. It is a largely populated area and is no place for this lab.  
 3|15.3

Get ideas on sharing photos from people like you. Find new ways to share. [Get Ideas Here!](#)

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: 19.3

DHS notes the commentor's concerns regarding the impact of an accident and subsequent potential evacuation on institutionalized population. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. %Appendix B to the NBAF EIS describes biocontainment lapses and laboratory acquired infections in the United States and world-wide. 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 at the Umstead Research Farm Site then site-specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident condition is considered to be very low probability event. There would not be an evacuation for an accidental release of FMDV, since FMDV is not a public health threat. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 3                      Issue Code: 15.3

DHS notes the commentor's concern. As described in Section 2.3.1 of the NBAF EIS, DHS's site selection criteria included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. Nevertheless, it has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. DHS is aware of the presence of the health and correctional facilities, described in Section 3.10.7.1. DHS has held public meetings and conducted outreach efforts to ensure that the surrounding communities, including officials of the health and correctional facilities, are well aware of the proposed action. The risks and associated potential effects to human health and safety were evaluated in Section 3.14. The risks were determined to be low for all site alternatives.

Tremonte, Nick

Page 1 of 1

WD0687

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**From:** Nick Tremonte [REDACTED]  
**Sent:** Monday, August 25, 2008 9:48 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF

Sirs:

1|24.5; | There are many reasons we encourage you to seriously consider locating your facility in Flora, not the least of which is our work force. The people of Mississippi are salt-of-the-earth people. We may not be the fanciest or flashiest group you will deal with but we have a great deal to offer. Your lab will be one more reason for our bright, energetic, young people to remain here and be a part of the future rather than leaving for imagined greener pastures.

1Cont.|24.5; | As Mayor of Byram, I recognize how important it is for your facility to locate in the best possible area. We welcome the opportunity to support your decision in any way possible.

With warmest regards,  
Nick Tremonte

[REDACTED]

Comment No: 1

Issue Code: 24.5

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

Trevena, Rob

Page 1 of 1

WD0252

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**From:** [REDACTED]  
**Sent:** Thursday, August 14, 2008 2:47 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF Draft Environmental Impact Statement

**To:** U.S. Department of Homeland Security; Science and Technology Directorate  
James V. Johnson  
245 Murray Lane, SW  
Building 410  
Washington, DC 20528

1|24.2 Thank you for the opportunity to comment on the proposed site for NBAF in Athens, Georgia. I am very much in support of this project and in support of locating it in Athens, Georgia. We have the necessary community and academic infrastructure to make this project exceptionally successful. The Draft EIS supports locating the facility here and we as a community are very appreciative of the potential opportunity. As further proof of my support for locating the NBAF in Athens, my home is only a few miles from the proposed site.

Rob Trevena

[REDACTED]

Rob Trevena

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

Trewyn, Ron

Page 1 of 2

WD0759

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**From:** R. W. Trewyn [trewyn@ksu.edu]  
**Sent:** Monday, August 25, 2008 3:27 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF belongs in Kansas

NBAF Program Manager:

1| 1.0

With today's global travel and movement of animals and goods, many foreign animal diseases will become U.S. livestock diseases naturally in time, and perhaps not too much time in some cases. As a result, effective new therapeutics and other countermeasures could be needed for some of these diseases soon ... even before the NBAF is built.

Moreover, based on al-Qaeda plans found in the caves of Afghanistan, multiple foreign animal diseases could become U.S. livestock diseases exceedingly soon, perhaps tomorrow. Thus, vaccines, antivirals, and other therapeutic regimens are urgently needed today! America can't wait.

Fortunately, the Kansas State University (K-State) Manhattan Campus Site provides the NBAF solution for DHS. K-State recognized the vulnerability of America's agricultural infrastructure and food supply to terrorist attacks well in advance of September 11, 2001. In March of 1999, K-State unveiled a comprehensive "Homeland Defense Food Safety, Security, and Emergency Preparedness Program." This multifaceted initiative proposed to: (1) enhance agrosecurity research efforts focused on food crops, food animals, and food safety; (2) utilize the land-grant, county-by-county network for frontline defense; (3) establish interactive linkages between the ag/food sectors and the first responder, law enforcement, and military defense communities; (4) create a broad-based agrosecurity education and training program; and (5) build an integrated (food crop/food animal/food processing) BSL-3Ag facility to support agrosecurity research and to help meet the surge capacity needs for biocontainment laboratories regionally and nationally. All of these aspects have been fostered and expanded since that time.

With State of Kansas legislation and support, the \$54 million BSL-3Ag Biosecurity Research Institute (BRI), was constructed at K-State. The BRI is unique-in-the-world in its integrated agrosecurity/food safety and security capabilities. The functional cores include: (1) animal rooms and support facilities for research on infectious diseases of livestock and poultry (holding up to 32 eight-hundred pound cattle and many more smaller species); (2) a slaughter floor and food processing capabilities to validate technologies developed for pathogen mitigation during processing; (3) plant science laboratories for research on the control of food crop pathogens and for developing plant-based vaccines; (4) insect vector research

Comment No: 1      Issue Code: 1.0

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

Trewyn, Ron

Page 2 of 2

cont. | 1 | 1.0

laboratories; (5) basic molecular biology laboratories; (6) biosecurity education and training space; and (7) administrative support space.

\* Because of these capabilities, K-State's BRI in Pat Roberts Hall will allow the NBAF mission to be launched in 2009; it's built; it's ready to go. No other NBAF finalist site comes close to matching this crucial infrastructure need.

\* Moreover, K-State and its Heartland BioAgro Consortium collaborators have a combination of cattle, swine, and poultry expertise, along with infectious disease and public health capabilities, unmatched by any other NBAF locale.

\* Additionally, Midwest Research Institute supplies decades of federal laboratory operations and management experience plus biocontainment, biosafety and biosurety proficiency.

\* Then on the corporate side, the Animal Health Corridor -- with one-third of the global animal health market -- provides unrivaled private-sector R&D and therapeutic production capacity.

Scientific R&D is accelerated by proximity to research capabilities, probably explaining why it was the leading NBAF selection criterion. The NBAF mission requires acceleration. Considering how America and the world have changed in the past seven years--since 2001, waiting another seven years (or whatever it takes) for NBAF to be constructed makes no sense. America's homeland security requires accelerated bio and agro-defense today.

2 | 24.2

Therefore, there's but one real choice: NBAF in Kansas. No other site can accomplish for DHS what can be accomplished at the K-State Manhattan Campus Site now. No other site has been working on homeland security as long. Thus, the proper home for NBAF is here in Kansas.

Thank you,

Ron Trewyn

R.W. Trewyn, Ph.D.  
Vice President for Research  
Kansas State University  
108 Anderson Hall  
Manhattan, Kansas 66506-0113  
Phone: 785/532-5110  
Fax: 785/532-6507

Comment No: 5

Issue Code: 24.4

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

Tuck, Ryan

Page 1 of 1

WD0114

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**From:** Ryan Henderson Tuck [REDACTED]  
**Sent:** Saturday, July 26, 2008 2:49 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF

To Whom it May Concern:

1| 24.3 I would like to express my support for the National Bio and Agro-Defense Facility. Further, as a resident of North Carolina, I very strongly urge you to seriously consider utilizing Butler, North Carolina as the site for this facility. It is clear that North Carolina has support for government agencies and other biological sciences related industries including the National Institutes of Environmental Health Science, the Environmental  
2| 8.3 Protection Agency, a considerable number of pharmaceutical companies in the Research Triangle Park area as well as several nationally recognized research Universities. I can assure you that the support for research into medically relevant issues as well as the security of the United States of America is a universally held tenet by the people of this great state. Thank you very much for your attention.

Sincerely,

Ryan H. Tuck

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: 8.3

DHS notes the information provided by the commentor.

**Tucker, Ross**

**Page 1 of 1**

PD0207

August 22, 2008

1|24.5

Hello. My name is Ross Tucker resident of [REDACTED] Mississippi in the [REDACTED] metro area of Mississippi. I wanted to pledge my support for bringing the NBAF to Flora, Mississippi.

This is my own personal expression. And, thank you for considering it.

Comment No: 1

Issue Code: 24.5

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

Tucker, Shirley

Page 1 of 1

WD0454

**From:** Shirley Tucker [REDACTED]  
**Sent:** Friday, August 22, 2008 3:25 PM  
**To:** NBAFProgramManager  
**Subject:** I support NBAF in MS

1) 24.5

I am excited to know that MS is one of the proposed sites for the Bio and Agro-Defense Facility. Our state is prepared to undertake this major initiative with the many professionals that we currently have in our great state. It is also true that we have made major strides in Mississippi which include being the first among many great endeavors and I am proud to say that we would like be among the first to host such a project which will impact lives tremendously.

We are excited about the opportunity to help with disease control and to promote growth.

Looking forward to supporting NBAF in Mississippi.

Shirley Tucker

Comment No: 1

Issue Code: 24.5

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

Turner, Keith

Page 1 of 1

WD0654

**From:** KEITH TURNER [kturner@watkinsludlam.com]  
**Sent:** Friday, August 22, 2008 4:40 PM  
**To:** NBAFProgramManager  
**Subject:** Flora Mississippi

1|26.0;  
2|24.5

I attended the evening session of the Draft EIS for Flora Mississippi and having dealt with many EIS's before I was impressed by the compressive review and analysis of the work. Although there are many variables in the decision process I hope that public support will carry sufficient weight. The citizens of Flora, metro Jackson and Mississippi are very much in support of this project as evidenced by the many individuals that spoke out in support that evening. From my review of the draft EIS it would appear that the Flora site has all the necessary attributes to allow the lab to be successful. When considering the other potential sites and their issues, Flora comes out on top. I look forward to reading your final EIS. Thanks.

Keith W. Turner  
 Watkins Ludlam Winter & Stennis, P.A.  
 633 North State Street  
 Jackson, MS 39202  
 601-949-4868 Direct  
 601-949-4804 Fax  
[kturner@watkinsludlam.com](mailto:kturner@watkinsludlam.com)

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Comment No: 1                      Issue Code: 26.0

DHS notes the commentor's statement.

Comment No: 2                      Issue Code: 24.5

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