WD0589

From: Grady Thrasher, III
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 I-85 near Lake Michelle, 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 McLawhorn, 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.
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.

- 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.”
- 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 *Borrelia 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.
- 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.
- 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.”
- 1979 – Disregarding the committee recommendation, the US Army undertakes investigation of deadly “Zagacig 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.
- 1982 – Federal review board began 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, [a]nd pressures by management to expedite programs have resulted in compromising safety.”
- 1983 – Six Plum Island workers test positive for African Swine fever virus. Workers were not notified of their results.
- 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.
- 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.
- 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.
- 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.
WD0589

- 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.
- July 13, 1992 – While USDA continues to officially deny that any biological weapon 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.”
- Early 1990s – PIADC annual report to Congress is eliminated.
- 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.
- 1999 – New York Post quotes USDA spokesperson: “…top security [at Plum Island] 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.”
- 1999 – A cold war era document 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.
- 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.
- 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.
- July 2001 – Court approved consent order forces USDA to admit to sewage discharge violations.
- September 2001 – Shortly after the 9/11 terrorist attacks someone begins sending weaponized Anthrax through the US mail, killing five people. Genetic analyses showed that the dry Anthrax spores used in the attack originated from USAMRIID (Fort Detrick, MD).
- 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?”
- August 2002 – PIADC workers go on strike to protest unsafe working conditions.
- 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. [It] shakes the foundation of our very form of government.”
- 2002 – Pakistani police arrest Sultan Bashiruddin Mahmood, a nuclear physicist with ties to Osama Bin Laden, and Mullah Omar. From his residence they recover
material on Plum Island.

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**Question:** On December 15, 2000 The National Institute of Allergy and Infectious Disease (NIAID) 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.

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**Question:** What diseases would be studied in the NBAF BSL-4 lab if it comes to Butner?

**Answer:** Only Nipah and Hendra viruses.

**Question:** 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?
DHS notes the commentor's statement.
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 biosafety and biocentrainment 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 CEO’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 commentor's opposition to the South Milledge Avenue Site Alternative.
M. Smith Griffith

cc: James Johnson, NBAF Program Manager
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.

--- Original Message ---
From: Grady Thrasher, III
Sent: Saturday, August 16, 2008 12:34 PM
To: NBAFProgramManager
Subject: FW: Connecticut Attorney General

Dear NBAF Program Manager,

Please include the following series of emails as scoping comments from Athens, GA on the NBAF DEIS. 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
Sent: Saturday, August 16, 2008 12:32 PM
To: Andy Herod
Cc: hoard@athensclarkecountyga.gov; dawson@athensclarkecountyga.gov
Subject: RE: Connecticut Attorney General

Dear Andy,

We may be naively optimistic, but we hope to convince UGA to be altruistic and foresighted 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. Irrespective, 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
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
Sent: Saturday, August 16, 2008 12:51 AM
To: Grady Thrasher, III
Subject: Re: Connecticut Attorney General

Grady: you do realize, 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 6281

www.athensclarkecounty.com/commission

----- Original Message -----
From: "Grady Thrasher, III"
To: Andy Herod
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".
Best regards,

Grady Thrasher

--- Original Message ---
From: Grady Thrasher, III
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
Sent: Friday, August 15, 2008 10:06 PM
To: [redacted]
Subject: Connecticut Attorney General


Connecticut Attorney General's Office
Press Release
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 stoned elsewhere."
From: Grady Thrasher, III  
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.txt

Dear NBAF Program Manager,

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

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 foresighted 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 some of 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 lightly has published with pride its link 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 snared up by DHS to buy into DHS's NBAF awesomakiss 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-Abts, a nonprofit group opposed to locating NBAF in Athens-Clarke County.

Published in the Athens Banner-Herald on 041008
From: Grady Thrasher, III
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

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: Prince Plus
Sent: Monday, August 18, 2008 3:14 PM
To: [Redacted]
Subject: newspaper article scan

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Cody Davis
Graphic Designer
Prize Plus
Dangers outweigh benefits of bio lab

August 14, 2008

Katie McAdams
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.
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.

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.

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.
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

WD0323

From: Grady Thrasher, III
Sent: Monday, August 18, 2008 1:16 PM
To: Philip Ingram; NBFAProgram Manager
Subject: FW: Our own worst bioenemy - LA Times

Please include the following newspaper article in the scoping comments regarding the NBFA DEIS relative to the Athens, GA location.

Thank you.

---Original Message---
From: Matt DeSvenia
Sent: Monday, August 18, 2008 1:51 PM
To: Grady Thrasher, III; Nancy zehlita
Subject: Our own worst bioenemy - LA Times

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


From the Los Angeles Times

DHS notes the information submitted by the commenter.
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 scare 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 fingerprints 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 Weiscott 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 Elbright, 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.
administration and put most of the thousands of microbiologists to work on the germs we really need to worry about.

Wendy Oren is the author of "Plague: The Mysterious Past and Terrifying Future of the World's Most Dangerous Disease."
DHS notes the information submitted by the commentor.

From: Grady Thrasher, III
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

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: Prinz Plus Sent: Monday, August 18, 2008 3:14 PM To: Subject: newspaper article scan

Cody Davis
Graphic Designer
Prinz Plus
Dangers outweigh benefits of bio lab

WD0331

McDaniel

Keeping it Clean

AUGUST 14, 2008

The Environmental Impact Statement for the...
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.
CDC SAFETY: Germ lab outages continue

By Alton 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 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 14, 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 rabbies, HIV, influenza and tuberculosis, including extensively drug-resistant strains. The building has Biosafety Level 3 (B3) labs, which need electricity to maintain negative airflow. This key safeguard helps contain germs by making sure all 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.
"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 2009 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 90 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
infected. Duct tape now seals the B 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.
Nearly 100 construction workers 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.

FRI, 16: 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 29.

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
DHS notes the information submitted by the commentor.
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 bioterror all fear 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 “tespoop-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 pathogens than “tespoop-sized amounts.” According to the DEIS, “the largest scale envisioned for manufacturing needs in this facility is 3BL - 5BL.” That's liters vs. tespoops.

Then there’s the bugs, or rather the vectors: In the DEIS we learn NBAF will have its own entomary 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 states 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 lamed 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 325 people. The majority of these employees would be research scientists and other
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 tail 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 ogmooprogrammanager.dhhs.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 07/13/09

COMMENTS

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 terminal 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 throughout Georgia, because this bio-terrorism lab will affect our entire State for the worse.
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 temp truck?

Barney, July 13, 2008

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

Barney, July 13, 2008

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

Barney, July 13, 2008

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

Barney, July 13, 2008

Bad try.

Barney, July 13, 2008

Well get yourself a sense of humor, then.

Barney, July 13, 2008

Try reading the article before commenting?

Barney, July 13, 2008

I did, thanks.

Barney, July 13, 2008

Then try comprehending the article before commenting?

Barney, July 13, 2008

I did, thanks.

Barney, July 13, 2008

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

Barney, July 13, 2008

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

Barney, July 13, 2008

Sir Walter Scott

Pres. Adams & Dr. Lee

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

Barney, July 13, 2008

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

FACT FINDER

Barney, July 13, 2008

"Insectary"

Let me tell you about RR Valley Fever.

Quote from DERS: "The warm climate and aquatic habitat suitable for anthropod vectors (mosquitoes, flies, tick, flies etc.) would increase the likelihood that the RVF (RR 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.

USA 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.
Communicability

Viruses infect humans: humans are high enough to infect mosquitoes and introduce Rift Valley fever into new areas.

http://www.state.rj.us/animals/divisionsah/diseases/rijavaely.html

This alone should keep NBAF out of ATHENS.

Sorry, UGA VET link is:
http://www.vet.uga.edu/VPB/gray_book02ła1213rf.php

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, Pleasee

When there is such a strong reaction to an invasive development within a community it is obvious that the 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.

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

"Ducky Lucky told me," said Goosy Loosy.

"Cocky Lucky told me," said Ducky Lucky.

"Henny Penny told me," said Cocky Lucky.

"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 DeBenno was vindicated.

Cary, your stupidity is showing.

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 melodies 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.
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."

Er, actually it didn't.

You didn’t get the sarcastic remark.

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

"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, Mike.

Like this comment? [link to comment]

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

It’s right next door to Long Island!

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 built for just how risky these labs are. Moreover, the comparison is most, 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.
WD0117

From: Grady Thrasher, III
Sent: Monday, July 28, 2008 10:46 AM
To: [Redacted]
Cc: [Redacted]

Subject: FAQ/mc letter re NBAF DEIS

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.

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 DHS prior to August 14.

Best regards,

Kathy Prescott and Grady Thrasher
For Athens Quality-of-Life
www.athensql.org

Comment No: 1  Issue Code: 25.2
DHS notes the commentor’s opposition to the South Milledge Avenue Site Alternative.
WD0117

FAQinc. “For Athens Quality-of-life”
196 Alps Road, Suite 2, Box 205
Athens, Georgia 30606
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...
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 public 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 recommendations 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
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
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
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”
DHS notes the commentor’s opposition to the Umstead Research Farm Site Alternative.

DHS notes the commentor’s statement regarding security.

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.

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.

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 disproportionally 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.
WD0896

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

The North Carolina site clearly makes that an attractive option.
for example tinyURL.com/Medical Apartheid

(See http://NsBio.org/html/reports.html)
(see tinyURL.com/la8257)
(GOOGLE search: "Medical Apartheid" mosquitoes)

For all of the above reasons, and many more (see attached),
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!!
Chapter 2 - Comment Documents

NBAF Final Environmental Impact Statement

Tiffany, Christopher

Page 4 of 5

NBAF-Durham meeting: 2008-08-11 (Monday) 200 East Main Street, Durham, NC 2nd 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 49 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 Greens More Reservoir, and Lake Michie (Durham). This proposed site (which plans to grow diseased mosquitoes & ticks) is also near the River FNO (buzzz) 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-and-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 (5%) 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 falsely refusing to falsify records. When I visited the farm, I saw them bleed sheep with diseased feet & faces, gapping 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 E. coli 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 (RVF) virus, a hemorrhagic disease WORSE than EBOOLA (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/Lab2c77) After infecting animals, they will be carved up and either flashed 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 flashed 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, tinyURL.com/BioHazard, and go to NoBio.ORG & click FAQs, and Petition and click Lab 2c77 (a book about safety problems at “the safest virus lab in the world” – e.g., West Nile) also (Google search: "Medical Apartheid" mosquitoes)
Have you been bitten by a mosquito this year?  

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 Pathogens 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 247, Erich Trautl & 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 airborne & 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 of human JEV cases die (a human death rate of 1/3 is described as only a "moderate" death rate) & another 1/3 develop long-term neurologic damage." 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 outbreak from the North Carolina site would be in the Billions 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 US/a & the N.S.A 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 preaged 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 Uptown 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" in 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.
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.

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.

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

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 then 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.
Dear sir/madam,

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.

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.

I urge you to seriously consider Granville County as the location for the NBAF site. You have my support.

Thank you for your time,

Phil Tippett

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).
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.

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

Tolliver, Thomas

Chapter 2 - Comment Documents
NBAF Final Environmental Impact Statement

Page 1 of 1

TOMAS C. TOLLIVER, JR.
CHANCERY CLERK
P.O. BOX 5; 6
WOODVILLE, MISSISSIPPI 39669

To:

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

Dear Sir:

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.

Tolliver, MPA, MCEM
Widickson County
Woodville, Mississippi 39669
DHS notes the commentor’s opposition to the Umstead Research Farm Site Alternative.

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.

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

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

Sirs:

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.

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
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.
NBAF Program Manager:

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...
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.

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: 785/532-6007
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.

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From: Ryan Henderson Tuck
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 Battelle, 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 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
August 22, 2008

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 Flow, Mississippi.

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

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

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
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.
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Jackson, MS 39202
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kturner@watkinsludlam.com