August 13, 2008

Yes, I'm speaking in favor of Manhattan, Kansas as the site for the NBAF facility.
I've lived in this community for six years - taxpayer - I own...owning my home. It's a wonderful community. I'm totally in favor of the NBAF facility being here.
I'm college educated. I know all the ramifications, consequences, details, that have been spelled out at many of the public hearing sessions which I have attended about this facility, and I continue to be in favor of it.
Our community has such a diverse and wide base of knowledge in this area. It would make sense to have that facility here in Manhattan, Kansas. Take advantage of the intellectual people, the facilities that already exist that would wonderfully supplement and complement the endeavors of NBAF facility.
I hope that you will choose Manhattan, Kansas as the site. It makes sense. It would be the right decision to make on behalf of all of the citizens of this country and it would benefit those globally. It's the right thing to do.
Thank you.
August 13, 2008

I'm calling from Clay Center, Kansas, and I would hope that they build the new bio defense lab on Plum Island and nowhere on the mainland. If they are going to build it on the mainland, I would hope that they would not build it at Manhattan, Kansas, as my wife and I live 35 miles from there, and we would not like to see it built that close to where we live.

Thank you.
UNPRODUCTIVE, yarn@allnoro.com

Page 1 of 1

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

Comment No: 2                     Issue Code: 21.2
DHS notes the commentor's concern regarding the safe operation of the NBAF. Section 3.14 and
Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and
consequences of those accidents. Accidents could occur in the form of procedural violations
(operational accidents), natural phenomena accidents, external events, and intentional acts.
Although some "accidents" are more likely to occur than others (e.g., safety protocol not being
followed), the chances of an accidental release are low. The specific objective of the hazard
identification, accident analysis, and risk assessment is to identify the likelihood and consequences
from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of
the scenarios leading to adverse consequences, this analysis provides support for the identification of
specific engineering and administrative controls to either prevent a pathogen release or mitigate the
consequences of such a release. The risk of an accidental release of a pathogen is extremely low.
<table>
<thead>
<tr>
<th>Comment No:</th>
<th>Issue Code:</th>
<th>Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>11.2</td>
<td>DHS notes the commenter's erosion control concerns. The NBAF EIS Section 3.7.3.1 describes the affected water resources at the South Milledge Avenue Site alternative including surface water, stormwater, groundwater and floodplains. The potential consequences of the proposed NBAF's construction and operation on these water resources are described in Sections 3.7.3.2 and 3.7.3.3. Section 3.6.3.1 describes the potential 292,000 cubic yards of on site material that may be displaced and/or managed.</td>
</tr>
<tr>
<td>2</td>
<td>8.2</td>
<td>DHS notes the commenter's concern about the water quality risk to the Middle Oconee River from increased treated wastewater discharges from the Athens-Clarke County Middle Oconee facility due to NBAF operations. An evaluation of the impact from the proposed operation of the NBAF at the South Milledge Avenue Site on the sanitary sewage infrastructure is located in Section 3.3.3 of the NBAF EIS. Based on current treatment capabilities and planned improvements, no sanitary sewage infrastructure constraints have been identified for the South Milledge Avenue Site. In addition, an evaluation of the impact from the NBAF operation on the area's general water resources, to include surface water and groundwater, is located in Section 3.7.3 of the NBAF EIS.</td>
</tr>
<tr>
<td>3</td>
<td>12.2</td>
<td>DHS notes the commenter's concern about the water quality risk to the Middle Oconee River from increased treated wastewater discharges from the Athens-Clarke County Middle Oconee facility due to NBAF operations. An evaluation of the impact from the proposed operation of the NBAF at the South Milledge Avenue Site on the sanitary sewage infrastructure is located in Section 3.3.3 of the NBAF EIS. Based on current treatment capabilities and planned improvements, no sanitary sewage infrastructure constraints have been identified for the South Milledge Avenue Site. In addition, an evaluation of the impact from the NBAF operation on the area's general water resources, to include surface water and groundwater, is located in Section 3.7.3 of the NBAF EIS.</td>
</tr>
<tr>
<td>4</td>
<td>8.2</td>
<td>DHS notes commenter's concern that diesel fuel will be stored in underground tanks for NBAF emergency generator operation at the South Milledge Avenue Site Alternative. The current design of the NBAF at the South Milledge Avenue Site specifies only above-ground tanks for fuel storage. No underground tanks are included in the NBAF design.</td>
</tr>
</tbody>
</table>
While the EIS is a substantial piece of work, we feel that several places need more rigorous and quantitative analysis in order for the site to be fairly evaluated. Such analysis is warranted for such an important, irreversible decision. We also ask that in consideration of the effects described both in the EIS and above, Table Es-3 is revised to rate effects on the “Water” Resource for the South Milledge Site as “Moderate.” This would be consistent with page ES-10 where the EIS reads “Moderate effects that would occur would be to the following resources” under which the first bullet is POTABLE WATER.

Thank you for considering our comments.

Sincerely, Upper Oconee Watershed Network (www.uown.org)
DHS notes the commentor's support for the Manhattan Campus Site Alternative.
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

From: Viviane Van Giesen
Sent: Sunday, August 24, 2008 8:23 PM
To: NBAPProgramManager
Subject: Biolab In Athens Georgia

I would like to express my disagreement with the possible placement of a biological terror laboratory close to my residence. We have three kids and live close to the river and to the Botanical Garden. This is a beautiful place, and it really is amazing that somebody would think of building a terror laboratory close to this neighborhood. We have the best public school system of Georgia, close to the University of Georgia, Botanical garden, all sorts of activities for children. Would you like to have your children living close to a terror bio lab? I bet you wouldn't approve of this laboratory in YOUR neighborhood.

Thank you,

Viviane Van Giesen
Van Kuren, Peter

Page 1 of 1

Dear Mr. Johnson:

I'm writing in strong support of locating the National Bio and Agro-Defense Facility (NBAF) in Manhattan, Kansas. The benefits of choosing Kansas on the merits of animal health research and development are well known and unequivocal. As Director of the Manhattan Regional Airport, I would also like to highlight the benefits of convenient air transportation.

The Manhattan Regional Airport is located less than 9 miles (15 minutes) from the proposed building site of the NBAF. The Manhattan Regional Airport is an FAA certificated Primary commercial service airport capable of supporting all the commercial and corporate air travel needs of staff and visitors of NBAF. We offer frequent daily service to Denver International and Kansas City International airports allowing for convenient connections to and from all major domestic and international locations.

In March 2008 Governor Sebelius approved legislation providing $2 Million in support of our ongoing effort to attract additional air service to another Large Hub airport. This effort has received broad based support from across the State. As the airline industry navigates out of its toughest economic time in history, we are well positioned to gain additional service that will enhance the already convenient service, and provide more options to the traveling public.

Once again, let me express my strong support for NBAF in Kansas, and my assurances that the Manhattan Regional Airport stands ready to support the NBAF mission. If I can answer any questions or provide additional information about our Airport’s capability, please don’t hesitate to call.

Sincerely,

Peter C. Van Kuren
Airport Director
Manhattan Regional Airport
5500 Fort Riley Blvd. Suite 120
Manhattan, Kansas 66502-5497
Office: (785) 587-4565
Cell: (785) 410-4868
Fax: (785) 587-4569
Website: www.FlyManhattan.com
August 25, 2008

Yes.

Good afternoon. My name is Dirk B. Vanderleest. I’m with the Jackson Municipal Airport Authority. I am the Chief Executive Officer and I’m here to comment on the NBAF environmental for Flora, Madison County, Jackson, Mississippi and I just want to state for the record that JMAA, that is Jackson Municipal Airport Authority, supports this facility in the metropolitan area. It would bring a tremendous amount of opportunities, not only for the local economy, but also for the airport authority itself. We embrace the opportunity to participate with this project.

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

DHS notes the commentor's concern regarding the safe operation of the NBAF. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and consequences of those accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some “accidents” are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

See response to Comment No. 3.

DHS notes the commentor’s water use and source concerns and DHS acknowledges regional drought conditions. As described in the NBAF EIS Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day useage. The NBAF potable water usage is comparable to approximately 228 residential homes. The NBAF EIS Section 3.7.3.1.1 describes three potable water sources accessible to the South Milledge Avenue Site; the Middle Oconee River, North Oconee River, and the Jackson County Bear Creek Reservoir.

DHS notes the commentor’s support for the proposed research that would be conducted within the NBAF. Modern biosafety laboratories can be safely operated in populated areas. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. The risk of an accidental release of a pathogen is extremely low. 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 human health consequences of potential accidents.

For your information, we’ve lived near the proposed site since 1978. We understand the need for the NBAF and approve of its construction, but we strongly object to locating the NBAF near densely populated residential areas such as the Athens proposed site. A letter previously submitted to the DHS by Larry and Mary Hepburn follows. We strongly agree with the points they make in their letter.

Sincerely,
Ronald and Linda VanSickle
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.
WD0790

VanSickle, Ronald and Linda

Chapter 2 - Comment Documents

NBAF Final Environmental Impact Statement

Page 2 of 3

Date: Wed, 28 Aug 2008 22:16:45 -0400 (EDT)
From: Lawrence Huyse
Subject: NBAF Letter set.

We are retired faculty members of the University of Georgia who have lived in the area for 30 years. We read about the proposal to build a national “bio and agro-defense” facility here. Speaking with hundreds of other Athens residents we attended one of the two NBAF public hearings on August 15. This was a poor time for community input. Many residents had not returned from summer vacations, and those just returning as well as students newly arrived were not aware of the hearings or the issue of their own safety.

The hearing provided useful information. We learned about the purpose of such facilities, its structural features, and advancements in biological and agricultural defenses that a new facility is designed to provide. One cannot argue with its purposes. Clearly such a research facility is needed in the U.S. Location, however, is a prime concern – not only for the convenience of DHS and scientists who will work there but also for the safety of the public that this lab is meant to benefit.

We think a serious error has been made by The University of Georgia and Athens-Clarke County authorities in offering the NBAF site in Athens-Clarke County on Millidge Avenue alongside the State Botanical Gardens. This site is less than three miles west of extensive residential and retail commercial development. Stretching just three to four miles east of this site are residential subdivisions – University Heights, Green Acres, Cedar Creek, Ashton Place, Crestwood, Stampfinger, Carriage Plantation to name a few – which house thousands of families. Serving these residential areas are three public elementary schools, a private elementary school, a public middle school, and a public high school. Hundreds of university student apartments, condos, and dormitory rooms are within three miles of the Millidge Avenue site.

With respect to wind patterns, the proposed site is a poor choice. It is located along a weather path where strong winds and thunderstorms regularly move west to east from Oconee County and Morgan County to the eastern residential part of Clarke County. This year alone in the Cedar Creek subdivision we’ve had at least ten tornado warnings and several tornado warnings from storms moving along a path across the potential NBAF site into residential areas. Examining records of the National Weather Bureau shows this.

Lab damage by windstorms is a serious threat to the public. We note that the draft NBAF EIS states in Appendix E that based on high velocity missile test “the proposed NBAF conceptual design is not expected to resist the effects of wind-blown missiles.” (p. 145)

Local wind patterns hold other potential risks at the Athens site. The draft EIS notes, “For all of the proposed sites, except Plum Island, NY, there was a potential for viral pathogens to be transported significant distances by the wind. The results of the modeling indicate that this transport pathway is not limited, as was the case for Plum Island. It is considered likely that deer, wild bear, and other wildlife live on the island could act to spread disease over long distances.” (p. E-161)

With respect to insect-borne pathogens, the Athens site has an especially high risk potential from escaped infected mosquitoes. Athens-Clarke County features a relatively warm and humid climate, wetlands and woodlands, and as a consequence, a large resident mosquito population. It also has large livestock populations susceptible to mosquito-borne pathogens. The EIS notes, “With the exception of the proposed Plum Island NBAF site location in NY, the other site alternatives are in population areas (high densities of people and animals) and the surrounding ecosystems that provide favorable environments to support pathogen spread and growth in the event of a release.” (p. E-862)

In Athens-Clarke County, adequate water supply and sewage disposal are longstanding shortcomings. Requirements for water supply and waste disposal in a facility handling deadly pathogens and carcasses of diseased animals will place unrealistic demands on local public utilities of limited capacity. This site is in the heart of a drought area in which residential and commercial water usage is strictly limited by state law and local ordinance. It is also in an area where an historically inadequate county sewage system is only now beginning to address long-deferred rehabilitation in order to handle sewage loads generated by a residential population grown
large over the last 40 years.  

Human error and infrastructure breakdowns regarding this type of facility can have very serious consequences as we have seen in recent news about CDC in Atlanta and other DHS facilities. The likelihood of such errors and breakdowns are great enough to suggest that such facilities do not belong in or near residential areas.

In closing, we would like to point out that if the business and political leadership of Athens-Clarke County, and that of the University of Georgia are fixed on having a federal facility, it should look to the University’s extensive land holdings nearby which would provide more suitable sites for NBAF. For example, the University holds a total of 1006 acres in Oglethorpe County, which is contiguous to Athens-Clarke and is within 30 minutes commuting distance of the main campus. Yet, it is a rural and far less densely populated area than the urbanizing areas of the proposed site on Millidge Avenue.

Surely our community leadership should have expressed some of the concerns we raise about the Millidge Avenue site. We fear that state and local authorities have placed public safety low on their list of priorities. Development dollars seem to be their only interest. We are repeatedly told that many new jobs will be available in this facility, yet, the DHS spokesperson at the public meeting made it clear that the federal agency would bring in its own scientists and professionals. Are local leaders as well as the public being duped?

Public protection, not economic development, is the first duty of government. The isolated offshore location of the existing Plum Island facility tells us that public safety was of paramount concern to scientists and government officials in siting that facility fifty years ago. Yet, only recently New York’s two U.S. Senators oppose extending that facility or building a new one on Plum Island because of increased safety concerns associated with NBAF; it could endanger even populations who live across the water, but downwind, of the facility. Apparently, neither of Georgia’s two U.S. Senators, nor other Georgia members of Congress, members of the Georgia General Assembly, or elected officials of Athens-Clarke County, have carefully considered similar potential dangers to people living in Athens-Clarke County.

Lawrence R. Hepburn and Mary A. Hepburn
I am HR Director for a company with almost 3,000 employees. I can attest that this state has a workforce of people who have an admirable work ethic and finding people with the skill sets for unique positions is not as difficult as you may first think it may be. People in this state rise to the occasion and there are many who have been educated and looking for opportunities and want to stay in Mississippi. I think you would make a good choice to locate this facility in our state.

Becky Vaughn-Furlow
Executive Vice President and Director of Human Resources
Trustmark National Bank
P. O. Box 291
Jackson, MS 39205
Email bvaughn@trustmark.com
Phone 601 208-6342
or 800 844-2000, ext. 6342
Fax 601 208-6064
Cell 601 540-4508
Comment No: 1  Issue Code: 25.3
DHS notes the commentor’s opposition to the Umstead Research Farm Site Alternative.

Comment No: 2  Issue Code: 19.3
DHS notes the commentor’s concerns regarding an accident at the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g., Rift Valley fever [RVF] virus) becoming established in native mosquito populations was evaluated in Sections 3.8.9, 3.10.9, and 3.14 of the NBAF EIS. DHS would have site-specific standard operating procedures (SOP) and response plans in place prior to the initiation of research activities at the NBAF. RVF and foot and mouth disease SOPs and response plans would likely include strategies that are similar. However, the RVF response plan would also include a mosquito control action plan. The potential consequences of pesticide use would be evaluated during the preparation of a site-specific response plan. 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.

Comment No: 3  Issue Code: 2.0
DHS notes the commentor’s opinion.

Comment No: 4  Issue Code: 8.3
DHS notes the commentor’s concern. The impact from the proposed operation of the NBAF at the Umstead Research Farm Site on the local sanitary sewage system capacity and infrastructure is discussed in Section 3.3.7.3.4 of the NBAF EIS. The design and operation of the NBAF at the Umstead Research Farm Site would prevent negative impact to the Sewage Treatment Facility infrastructure and treatment capabilities. Specifically, as summarized in Section 3.15 of the NBAF EIS, pre-treatment of liquid waste streams would be implemented as necessary to meet treatment facility acceptance criteria, therefore avoiding potential impacts.

Comment No: 5  Issue Code: 9.3
The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the Umstead Research Farm Site are discussed in Section 3.4.7. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Air emissions were estimated using SCREEN3, a U.S.
EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF does not significantly affect the region’s ability to meet air quality standards.

Comment No: 6  Issue Code: 18.3
DHS notes the commentor’s concern. As discussed in Section 3.13.2.2 of the NBAF EIS, several different technologies are being considered for carcass and pathological waste disposal. Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As discussed in this section, the final design for the NBAF will probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4. of the EIS (Air Quality) assumes that incineration, the treatment technology with the greatest potential to negatively impact air quality, will be used to assess the maximum adverse impact.

Comment No: 7  Issue Code: 24.1
DHS notes the commentor’s support for the Plum Island Site Alternative.
Comment No: 1  Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2  Issue Code: 21.2
DHS notes the commentor’s concern. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some “accidents” are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

Comment No: 3  Issue Code: 15.2
DHS notes the commentor's statement regarding employment. The number of short-term and permanent jobs are discussed in Chapter 3, Section 3.10 of the NBAF EIS. It is expected that approximately 2,700 direct temporary jobs would result from construction of the NBAF, with many of the jobs being filled locally. Approximately 483 permanent jobs, including the initial 326 direct jobs, would result from operation of the NBAF. Permanent employees will include scientific and support staff as well as operations, maintenance and security staff. A portion of the permanent jobs at the NBAF will be filled locally and the household spending by new residents and the operations of the NBAF are expected to indirectly support additional jobs that will be filled by the local labor force.

Comment No: 4  Issue Code: 2.0
DHS notes the commentor’s concern. Although the small-scale production facility to be used for vaccine production has a maximum capacity of 30 liters, no live virus would be used in the process.
DHS notes the commentor's opposition to the five mainland site alternatives in favor of the Plum Island Site Alternative.

Re: NBAF Environmental Impact Statement

Dear Mr. Johnson,

I am a rancher in Nebraska. Our economy is based on the sale of beef cattle. In an effort to minimize the risk to our industry, I encourage you to keep the NBAF at Plum Island. I feel that moving the lab to a mainland location would increase the risk of a foreign animal disease being introduced into our region. Maintaining the lab in an area geographically isolated from large agricultural areas is the way to go. We all know that mistakes and security breaches do happen. Please support keeping the NBAF at Plum Island. The United States cannot afford to compromise its agricultural base.

Sincerely,

Daniel H. Vinton

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

Comment No: 1                     Issue Code: 24.1
DHS notes the commentor's opposition to the five mainland site alternatives in favor of the Plum Island Site Alternative.
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

From: brenda wade
Sent: Saturday, July 05, 2008 8:17 PM
To: NBAPProgramManager
Subject: please not athens

125.2 no NBAF in the classic city, please

... Brenda Lee Pettrey Wade
Comment No: 1  Issue Code: 24.1
DHS notes the commentor's support for the Plum Island Site Alternative since the site has already experienced the effects of an existing laboratory performing a similar function.

Comment No: 2  Issue Code: 22.5
DHS notes the commentor's question regarding mitigating an accidental release. USDA is responsible for responding to foreign animal disease outbreaks. Site specific protocols would be developed, in coordination with local emergency response agencies, that would address how an accidental release would be addressed.

Comment No: 3  Issue Code: 15.5
DHS notes the commentor's concern. The potential economic effects of an accidental release at the Umstead Research Farm Site Alternative are discussed in Section 3.10.9.5 and Appendix D of the NBAF EIS. The risks were determined to be low for all site alternatives.

Comment No: 4  Issue Code: 21.5
DHS notes the commentor's concerns regarding a release of a pathogen at the Flora Industrial Park site and the potential for wildlife (birds) to spread the released pathogen. 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. By definition and as identified in Chapter 1, Section 1.1 of the NBAF EIS, BSL-4 facilities are specifically designed to safely handle exotic pathogens that pose a high risk of life threatening disease in animals and humans through the aerosol route and for which there is no known vaccine or therapy. 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 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations was evaluated in Chapter 3, Section 3.8.9 and Section 3.10.9 as well as in Section 3.14 (Health and Safety) of the NBAF EIS. 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. The RVF response plan would also include a mosquito control action plan. In addition, oversite of NBAF operations, as

December 2008
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).

DHS also notes commentor's concern regarding the impact of a FMD release. The potential economic effects resulting from an accidental release of FMD is discussed in Appendix D and Chapter 3, Section 3.10.9 of the NBAF DEIS. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as $4.2 billion until the U.S. was declared foreign animal disease free.

DHS notes the commentor's concern that site specific operational, safety, security and emergency response plans are not included in the NBAF EIS. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ’s regulations for implementing NEPA (40 CFR 1500 et seq.). The analysis conducted in the NBAF EIS was based on conceptual design plans posted on the DHS website. More detailed design plans would be developed as the project moves into the final design phase. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific operational, safety, security and emergency protocols and plans would be developed that would consider the diversity and density of human, livestock and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans would also include training for local law enforcement, health care, and fire and rescue personnel.

Comment No: 5 Issue Code: 23.0
DHS notes the commentor's concern regarding the cost of the utility infrastructure to support the NBAF operation at the Flora Industrial Park site. Chapter 3, Section 3.3.5 of the NBAF EIS includes an assessment of the current infrastructure, a discussion of the potential effects from construction and operation of the NBAF, and the identification of any infrastructure improvements necessary to
meet design criteria and insure safe operation. Financing mechanisms for identified utility improvements or upgrades are beyond the scope of the NBAF EIS. However, while the potential costs of proposed actions are not a factor in the environmental impact analysis presented in the NBAF EIS, cost information and the scope of the cost analysis performed is summarized in Chapter 2, Section 2.5 of the NBAF EIS to provide pertinent information to the DHS Under Secretary for Science and Technology so that he may make a more informed decision with respect to the alternatives presented in the NBAF EIS.

DHS notes the commentor's concern regarding the impact of the NBAF operation on the Illinois Central Gulf Railroad track to the east of the Flora Industrial Park Site. A discussion of current land use, including the tracks east of the site, potential changes in land use, and the projected impacts to land use based on the construction and operation of the NBAF at the Flora Industrial Park Site is provided in Chapter 3, Section 3.2.5 of the NBAF EIS. No alterations of current land use designations and planning resulting from the proposed NBAF are anticipated.

DHS notes the commentor's concern regarding improvements to transportation infrastructure. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Umstead Research Farm site, to include transportation infrastructure improvements, is provided in Chapter 3, Section 3.11.5 of the NBAF EIS.

Comment No: 6 Issue Code: 17.5
DHS notes the commentor's concern regarding the impact of the NBAF operation on the Illinois Central Gulf Railroad track to the east of the Flora Industrial Park Site. A discussion of current land use, including the tracks east of the site, potential changes in land use, and the projected impacts to land use based on the construction and operation of the NBAF at the Flora Industrial Park Site is provided in Section 3.2.5 of the NBAF EIS. No alterations of current land use designations and planning resulting from the proposed NBAF are anticipated. DHS also notes the commentor's concern regarding improvements to transportation infrastructure. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Flora Industrial Park site, to include transportation infrastructure improvements, is provided in Section 3.11.5 of the NBAF EIS.

Comment No: 7 Issue Code: 12.5
DHS notes the commentor's concerns. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Conservative assumptions were used to ensure the probable maximum effects were evaluated. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.13.6 describes site specific waste management processes that would be used to control and dispose of
Comment No: 8                     Issue Code: 18.5

Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As shown on the table, all of these technologies produce non-infectious residuals. As a result, there is no need for the local wastewater treatment plant to test for or remove disease organisms.

As discussed in Section 3.13.2.2 of the NBAF EIS, the final design for the NBAF will probably include more than one technology for the treatment of animal carcasses and pathological wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4. of the EIS (Air Quality) assumes that the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse effect. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 of the EIS (Infrastructure) assumes that alkaline hydrolysis will be used to assess the maximum sanitary sewage impacts.

DHS has no plans to put facility wastewater in underground tanks. The liquid biowaste gathering and treatment system will be housed in a dedicated space below the floors of the BSL3E, BSL-3Ag, and BSL-4 areas. This space will be similar to a vault and it will provide another layer of containment that would prevent any accidental leakage or spills from leaving the facility.
DHS notes the commentor’s concern regarding the NBAF. As described in Chapter 1 of the NBAF EIS, DHS’s mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.
DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 of the NBAF EIS, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. However, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden as indicated in Sections 3.8.3.2 and 3.8.3.3. Only minimal indirect effects would occur from operations due to increases in light and noise.

DHS notes the commentor's preference for siting the NBAF in a more isolated location such as the current Plum Island location. The NBAF EIS fully analyzes the Plum Island Site Alternative.

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

DHS notes the commentor's concern regarding the impact of the NBAF operation at the South Milledge Avenue Site on the area's potable water infrastructure and general water resources. An evaluation of the impact from the proposed operation of the NBAF at the South Milledge Avenue Site Alternative on the potable water supply and infrastructure is located in Section 3.3.3 of the NBAF EIS. Based on planned improvements to comply with NBAF design criteria, no potable water infrastructure constraints have been identified for the South Milledge Avenue Site. In addition, an evaluation of the impact from the NBAF operation on the area's general water resources, to include surface water and groundwater, is located in Section 3.7.3 of the NBAF EIS.

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

Comment No: 5                      Issue Code: 12.2
DHS notes the commentor's drought concerns and DHS acknowledges the drought conditions. As described in Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF potable water usage is comparable to 228 residential home’s annual potable water consumption.
usage.

Comment No: 6                     Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.
Comment No: 1 Issue Code: 19.3
DHS notes the commentor's concern about the human health and safety of the surrounding special-needs residents. Chapter 3, Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. A site-specific emergency response plan would be developed and coordinated with the local emergency management plan and individual facility plans regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF, and which would include stipulations for all special-needs populations.

Comment No: 2 Issue Code: 15.3
DHS notes the commentor's concern. DHS is aware of the presence of the health and correctional facilities, described in Section 3.10.7.1 of the NBAF EIS. DHS has held public meetings and conducted outreach efforts to ensure that the surrounding communities, including officials of the health and correctional facilities, are well aware of the proposed action.

Comment No: 3 Issue Code: 21.3
See response to Comment No. 1.

Comment No: 4 Issue Code: 18.3
DHS notes the commentor's concern. Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As discussed in this section, the final design for the NBAF will probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. As discussed in Section 3.13.8.3, sanitary wastewater from the NBAF would have to meet South Granville Water and Sewer Authority (SGWASA) acceptance criteria. These criteria do not allow infectious wastes to be discharged to the SGWASA. The NBAF would be operated to meet all applicable discharge requirements imposed by SGWASA; however, consideration of SGWASA's historical compliance record is not within the scope of the NBAF EIS.

Comment No: 5 Issue Code: 23.0
See response to Comment No. 3. In addition, DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans would also include training for local law enforcement, health care, and fire and rescue personnel. DHS notes the commenter's concern for security of the NBAF. Regardless of location, the NBAF would have the levels of protection and control required by applicable DHS
security directives. A Threat and Risk Assessment (designated as For Official Use Only) was prepared that evaluated site-specific security issues and will be considered in the decision making process on whether or not the NBAF is built, and, if so, where.

Comment No: 6            Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.
August 25, 2008

| 25.4 |
| 0x0 |

No National NBAF in Kansas. My name is Nell Walker and I'm from Nebraska.

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.
From: Sally Walker
Sent: Monday, August 25, 2008 8:50 AM
To: NBAFProgramManager
Subject: DEIScommentsNB
Attachments: EIScomments.pdf

25 August 2008

Mr. James V. Johnson
U.S. Department of Homeland Security, Science and Technology Directorate
Mail Stop #2100, 255 Murray Lane, SW Building 410
Washington, DC 20528

Dear Mr. Johnson:

Please find attached my comments on the DEIS NBFAF facility proposed for Athens-Clarke County. I thank you for the opportunity to comment on this, and I also enjoyed meeting you all when you were in Athens.

After reviewing the mild to moderate risks of such a facility, and finding some major risks were not modeled, I am very concerned about locating this facility in Athens near our precarious watershed area of the Middle Oconee River. I hope that I’ve outlined my concerns in reviewing the DEIS DESS for the proposed NBFAF facility attached as EIScomments.pdf. I realize this is a draft EIS, but I used DEIS and DESS throughout my comments. Hope that’s not confusing!

If you are unable to open my pdf document, please let me know!

Thank you very much for this opportunity to express my concerns. Information on this facility has been “streamed” down to Athens, so it has taken quite a bit of reading your document, listening to you all carefully at the Public gathering, and other documents to determine the impacts of such a facility in our town.

Sincerely,

Sally E. Walker
Walker, Sally

Page 2 of 14

24 August 2008

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

Dear Mr. Johnson:

Thank you very much for the opportunity under the aegis of NEPA to comment on your proposed NBAF facility as outlined in your "Draft Environmental Impact Statement June 2008 for the US Department of Homeland Security National Bio and Agro-Defense Facility". I enjoyed meeting many of you at the Public forum here in Athens. Thank you for listening to us, and I hope you will continue to do so in regard to the proposed NBAF lab in Athens, Georgia.

As a concerned scientist and professor of students at the University of Georgia, I am against such a facility being built in the Athens-Clarke County community, and I hope my evaluation of your DEIS will support my statement! My comments pertain to the proposed location of the facility adjacent to the Middle Oconee River, University of Georgia property, in Athens-Clarke County, Georgia.

I realize that my job may be in danger if I speak against such a facility; Dr. David Lee holds a considerable amount of power at the University, including allowing or disallowing applying for grants, allocation of grant money and lab space, and other research endeavors that are our livelihood as professors. Dr. Arnett Mace, as well, can also affect how much I teach, whether I can still have graduate students, etc. However, as I am an American citizen who, as a daughter of a Marine and a granddaughter of a Marine who fought in WWI and WWII, I hope, I am still protected by the right of free speech which they so valiantly fought for.

As way of background on me, I worked for a short time as an environmental consultant for Tetra Tech and for five years as a benthic laboratory manager or benthic invertebrate biologist for an Environmental Consulting firm that prepared EIS statements concerning marine systems off the coast of California. I am now a professor of Geology who is also co-staffed in Marine Sciences at the University of Georgia, Athens, Georgia.

I want to thank you again for allowing us to comment on this report, and I hope that my comments help improve your DEIS document. I also hope to show you that the Athens citing is not a good choice for your proposed BSL3/BSL4/ASBL-4 facility and that a smarter alternative is either not build the facility and continue to use Canada/Australia's facilities; or, locate the proposed NBAF site on an island or in a location as remote as possible for containment reasons. But, Athens is not an appropriate choice as I hope to demonstrate to you. I hope I did not make too many errors or have misrepresented you, as I could not read every detail of this report given the time I had.

Thank you very much for your time and consideration.

Sincerely,

Sally Walker

P.S. - Please correct any errors in my statement as well.
Walker, Sally

Page 3 of 14

DHS notes the commentor’s statement. All materials used in analysis and preparation of the NBAF EIS will be included in the Administrative Record. In addition, DHS made available on its website (www.dhs.gov/nbaf), on or about August 11, 2008, the key supporting documents which are expected to assist the DHS decision maker in making a final decision about NBAF. These documents include the Site Cost Analysis, Site Characterization Study, and Plum Island Facility Closure and Transition Cost Study, and other documents. It is DHS’ opinion that adequate time was provided to review the supporting documents.

Comment No: 4

DHS notes the commentor’s question. Information regarding local contributions were redacted from the document.

DHS notes the commentor’s statement. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ’s regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 23 public meetings have been held in the vicinity of NBAF site alternatives and in Washington D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered. DHS has also provided fact sheets, reports, exhibits, and a Web page (http://www.dhs.gov/nbaf). Additionally, various means of communication (mail, toll-free telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance. Consultation with the NRCS regarding Prime and Unique Farmlands at the South Milledge Avenue Site is complete and is located in Appendix G.

Comment No: 5

DHS notes the commentor’s concerns regarding possible impact to the area’s water resources. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to hazardous materials handling, spill prevention, and hazardous waste management. The NBAF EIS Section 3.13.4 describes the Waste Management processes that would be used to control and dispose of NBAF’s liquid and solid waste. Sections 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects. Section 3.3.3.4 describes the Middle Oconee WWTP’s sewage acceptance criteria that the NBAF would have to meet. DHS acknowledges the regional drought conditions. DHS notes the commentor’s drought concerns and
DHS acknowledges the drought conditions. As described in Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water, approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF potable water usage is comparable to 228 residential home’s annual potable water usage. Section 3.7.3.1.1 describes the potential potable water sources, the Middle and North Oconee Rivers and the Jackson County Bear Creek Reservoir.

DHS notes the commentor’s concern regarding potential effects on aquatic species and water quality at the South Milledge Avenue Site. Table 3.8.3.1.3-1 in the NBAF EIS provides a list of fish species that have been collected from the Middle Oconee River. As described in Section 3.8.3.2.2, impacts to a headwater stream would impact aquatic resources within a 50-foot reach. However, a properly designed road crossing would have little or no adverse effect on downstream aquatic resources. The impacted stream, which extends into the fenced pasture, has been severely impacted by loss of buffering vegetation and erosion and sedimentation. If the final design plan does not avoid stream impacts, DHS would consider restoration of the unaffected stream segments as mitigation for the impacts. 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. The NBAF EIS acknowledges the potential for minor adverse impacts on aquatic communities due to direct stream impacts, stormwater runoff, pollutant transport, and erosion and sedimentation. However, as described in Section 3.8.3.3.1, best management practices and low impact design (LID) features would be used to minimize the potential for such impacts. 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. As described in Section 3.3.3.1.4, sewage acceptance criteria and pretreatment requirements would apply to the wastewater discharged from the proposed NBAF. The Athens-Clarke County Sewer Use Ordinance of 2007 provides limits on specific pollutant discharges to the Middle Oconee Wastewater Treatment Facility. The NBAF would be designed and operated as necessary to comply with Athens-Clarke County Middle Oconee Wastewater Treatment Facility criteria and avoid the discharge of potentially harmful wastewater constituents. Implementation of approved erosion control measures, utilization of LID storm water pollution prevention measures, and compliance with wastewater treatment standards would prevent significant impacts on downstream aquatic communities; including macroinvertebrates, amphibians and fish.
Many: Almost evey University that can afford it are studying animal diseases in the United States (GAO 2007). Our taxpayer money has funded approximately 50 billion dollars of such labs in the United States (Bush administration budget: Operation BioShield, but started during the Clinton administration). While the EIS does cite the GAO 2007 report, they fail to mention the reason for such a report: the GAO raised a deep security threat in that not one federal agency knows how many, where, and what these high containment facilities are doing, except at very high levels. That's the problem, if an intentional leak, as in the Anthrax problem, occurs or an accidental leak, wouldn't it be difficult to pinpoint the problem? Rectify the situation? The public is not informed of these types of risks. This EIS does not justify why we need yet another lab to do the same thing that these other labs are doing, but with an added, more dangerous facility never before built on the mainland U.S. (a BSL4/BSL3/ABSL-4 lab) with no conflict-of-interest free oversight agency of such a facility. UGA, Merial, are not conflict-of-interest free entities, nor is the Georgia Alliance or the Medical College of Georgia. As taxpayers, we need a conflict-of-interest free entity to protect us.

This EIS statement does add that the most dangerous diseases known to humans and other animals (e.g. Hinder, Nipah) will be studied in a new BSL3a-BSL4-4 combined facility that the US labs now have, to be released in a highly urbanized, congested area of the United States next to farms with economically important livestock, located within a few thousand feet of the Oconee Watered area that flows into the seventh most endangered river in the United States, and close to a University with over 32,000 students that live or commute and drink the water from the Oconee River watershed area. Even if a small leak occurs, the economic impacts of such an event have not been adequately modeled. This is a major oversight of the EIS statement for the proposed NBAF facility, and also a major oversight by our state and local Government.

Walker, Sally

Page 4 of 14
the United Kingdom would not occur. NBAF research studies would provide consistent/reproducible data on products and processes of biological countermeasures, which would allow technology transfer to industry partners/contract manufacturers (not in the NBAF) for scale-up and commercial product manufacturing. The industry/manufacturer would be selected using an open competition.

DHS notes the commentor's statement. The risk assessment and methodology described in Appendix E and Section 3.14 represents a reasonable, conservative, and well-thought approach to determine hazards associated with potential accidental releases.

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.

DHS notes the commentor's views and opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though the Plum Island Site has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species. As described in Section 2.3.1, DHS's site selection criteria included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. Nevertheless, it has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and
Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF.

Comment No: 7                     Issue Code: 27.0
DHS notes the commentor's statement. DHS notes the commentor's suggestion. Section 2.4.3 of the NBAF EIS describes other alternatives considered including using existing laboratories. However, this was dismissed from further study because no other facility exists in the United States capable of conducting the research to satisfy the USDA and DHS missions. DHS notes the commentor's preference for siting the NBAF in a more isolated location such as the current Plum Island location. The NBAF EIS fully analyzes the Plum Island Site Alternative.
Walker, Sally

Page 5 of 14

WD674

DHS notes the commentor's concern regarding the NBAF. The purpose and need for the proposed action is discussed in Chapter 1 of the NBAF EIS. DHS can not guarantee that the NBAF would never experience an accident. However, as discussed in Section 2.2.1.1, modern biosafety design substantially diminishes the chances of a release as the primary design goal is to provide an adequate level of redundant safety and biocontainment that would be integrated into every component of the building. A discussion of human health and safety is included in Section 3.14. 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 intentionalusive 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.

DHS notes the commenter's question regarding oversight of NBAF operations. Procedures and plans to operate the NBAF will include the Institutional Biosafety Committee, which will include community representatives as described in Section 2.2.6 of the NBAF EIS. Should a decision be made to build NBAF and the site selected, DHS would begin transition and operational planning which would include consideration of policies and procedures for public participation, education, and also public advisory initiatives. After DHS determines the viability and nature of such a public advisory and oversight function, appropriate roles and responsibilities would be defined.
building containing the BSL-2, BSL-3E, BSL-3Ag, and BSL-4 laboratories with associated support spaces. The other building would be a laboratory for small-scale vaccine and reagent production.*

My comments: What is a "small scale vaccine and reagent production" building? How much? What type of vaccines? The Merial plant associated with the Pirbright labs in England had a lack of Foot and Mouth disease, with bad consequences for farmers and citizens in England where this took place. We have a Merial plant here in Athens, it generates vaccines. Will the DHS work with them? The consequences of a leak from the NBAF vaccine facility or a Merial plant in associated with such a facility are not modeled in this EIS report.

6. Executive Summary 1.0: "It would either be operated directly by the government or operated by a contractor with strict government oversight.*

My comments: Currently, there is no one agency that has oversight of the high-level biosafety labs recently built in the US through Operation BioShield or other federal, state or private mandate. What is the agency that will provide oversight? Is it fair to say that there is no conflict of interest here? The current problem recognized by the CDC in relation to the University of Texas incident shows that institutions are not into protecting even their own students. Rather, they are more interested in protecting their money source. This is a major problem, and I'd rather spend my taxpayer dollars protecting citizens rather than building more biolabs until we know that there is an unbiased oversight agency charged with protecting the public. Contracting out, too, was one of Pirbright's problems, because not all labs are fully funded to maintain the facilities. None of these issues are touched on in the current EIS statement.

7. Executive Summary 1.0: "Once the NBAF reaches its life expectancy, DHS may choose to decommission the facility and transition the property for future use. Standard decontamination protocols would be performed according to the Biosafety in Microbiological and Biomedical Laboratories to ensure the health and safety of the workers and the public."

My comments: I'd like to know what the "site-specific protocols" are for the proposed NBAF Athens site because it is in an ecologically-sensitive area adjacent to our drinking water source, the Middle Oconee River. This issue of "decontamination of the site" is not addressed. Also, are we guaranteed these these protocols will be used if another contractor takes over the facility? These issues are not addressed in the EIS document.

8. Executive Summary 1.0: "A federal steering committee recommended sites to the DHS selection authority... Some sites were eliminated from further consideration due to weaknesses and/or deficiencies, including the following: • Lack of proximity to existing BSL-3 or BSL-4 research programs that could be linked to NBAF mission requirements; • Difficulty in demonstrating ability to attract world-class researchers and scientists or skilled technical workforce with necessary experience; • Insufficient infrastructure, utilities, or other siting difficulties; and • Insufficient community support."

My comments: first, world-class researchers have been leaving UGA in droves because of the lack of support for their endeavors, especially since 2001 (eg., cancer researchers, pharmaceutical researchers, biological and ecological researchers, etc.). Within the last week, the State government's mandate of 8% budget cuts across the board means that science departments at UGA have cut up to 50 to 60% of their operating budgets. UGA also has withdrawn scholarship support for certain students, is planning to eliminate graduate student stipends in the sciences and is cracking down on small, graduate student classes (those that
underground tanks are included in the NBAF design. Section 2.2.2.5 Pollution and Spill Prevention, identifies the control and countermeasure requirements and plans required for the operation of fuel oil storage tanks at the South Milledge Avenue site and include a Pollution Prevention Plan, a Spill Prevention Control and Countermeasures Plan and a Storm Water Pollution Prevention Plan. Implementation of all plans will prevent impact to surface water and groundwater resources.

DHS notes the commentor's concern regarding the estimated usage of potable water and generation of wastewater from the NBAF operation at the South Milledge Avenue site. Section 3.3.3.3.1 of the NBAF EIS estimates the total annual water consumption at 43,000,000 gallons per year. Section 3.3.3.3.4 of the NBAF EIS estimates the annual wastewater volume at 26,500,000 gallons per year.

DHS notes the commentor's concerns regarding possible impact to the area's water resources. The information cited by the commentor from Appendix E, Section E.3.4.5 was inaccurate and has been removed from the NBAF Final EIS. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, spill prevention, and waste management. The NBAF EIS Section 3.13.1 describes the methodology applied to Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3 and 3.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 10 Issue Code: 23.0
Resource-specific mitigation measures are identified in the NBAF EIS and summarized in Section 3.15 of the NBAF EIS. The mitigation measures described in this section would be adapted, as appropriate. Should a decision be made to build the NBAF, all practicable means to avoid or minimize potential adverse effect from the selected alternative would be incorporated into the design of the NBAF. Further, the Record of Decision would identify any required mitigation, monitoring, and enforcement programs that would be necessary to offset any environmental impacts associated with the NBAF.

DHS notes the commentor's concerns regarding the effects of construction on bedrock in the area. 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. The proposed NBAF developed footprint will reduce the allowable area for groundwater recharge, however preliminary design parameters such as pervious pavement and stormwater reuse will minimize the effect.

DHS notes the commenter's concern for security of the NBAF. Regardless of location, the NBAF would have the levels of protection and control required by applicable DHS security directives. A
Threat and Risk Assessment (designated as For Official Use Only) was prepared that evaluated site-specific security issues and will be considered in the decision making process on whether or not the NBAF is built, and, if so, where. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies.
Walker, Sally

Page 7 of 14

WD0674

have less than five students) so that graduate students have no classes to take in some science departments. Therefore, I would argue that UGA is a poor choice for your proposed lab because the "skilled technical workforce" will not be there for you; it is not going to turn around, because this has been going on since 2001, and we are down more than 600 faculty members and counting. You can read President Adam's letter outlining the budget cuts to our chancellor if you don't believe what I say (available online).

Second, the citing of the proposed NBAF facility is in the Oconee Watershed region, is a major problem. Somebody wasn't doing their homework when they suggested this area to you, and I'll comment on that later.

And lastly, the community has not been adequately informed of this facility (although DHS has posted notices, I am not faulting you at all), that is: UGA has not informed its faculty, staff, or students of the pros- and cons- of such a facility; the local government also has not informed its citizens of the pros-and cons of such a facility; the local paper has, up until a few days ago, tamped down on any opposition to speak up about the "cons" of such a facility, in fact, calling anyone who raises issues about water or safety a "protester" or "ranter". And, at the Public DHS meeting on Thursday night, the Dale Cordley presenter skipped the "Risk" slide and thereby did not inform the public of the "cons" of such a site. He couldn't even list the pathogens when asked by a member of the audience. All these items are a disservice to the citizens of Athens, Oconee County and the workers/students who attend UGA. Please take these issues in mind, as it is clear that the community here has not been informed about the issues in an unbiased manner. A few people have pushed this initiative and the majority of the public has been kept out of the loop, including myself. I had to do a lot of indept searching to get anything on this facility (at first I was for it because I am all for research, until I read all the reports; this is a serious endeavor).

9. Executive Summary

"...South Milledge Avenue Site... closer to surface waters, so the potential for effects are greater... Runoff from the construction site has the potential to enter surface or groundwater sources, but storm water management during construction would minimize the potential for this to occur. Similar effects could occur with operation of the NBAF... Strict compliance with storm water pollution prevention plans and spill management protocols would minimize the potential and mitigate the potential effects of a spill. " Cumulative Effects. There would be minor cumulative effects to air quality, water supply, wastewater treatment capacity, and traffic with some of the site alternatives. Water use at the South Milledge Avenue Site... would contribute to regional water use during the current drought conditions, although there are few large regional development projects planned for the near future."

Water is the most fundamental issue not fully addressed in the EIS report for Athens. Water provides for the beauty and ecology of our area, as well as our drinking water, sewage dilution, recreation, and functioning of our city. Athens is cited within the Oconee watershed region, a region that drains into the Altamaha River, one of the seventh most endangered rivers, not to mention its species, in the U.S.

From NBAF siting report, part of DEIS released on 25 July 2008:

"Water: Dual water service is required to the site with a minimum delivery pressure of 35 psi. Water consumption ranges between 50,000 and 275,000 gallons per day with a peak flow rate of 657 GPM. The maximum value includes cooling tower make-up water for peak cooling days during the summer months and is less other times of the year. The estimated total annual water consumption is 43,000,000 gallons."

The estimated amount is more than Athens-Clarke County can give you, even in a good year. Last year, 12 cfs ran through the Middle Oconee near the proposed NBAF facility, a
trickle compared to what you need. The statement in the 25 July report contradicts the Executive summary amounts. We are in a massive drought year, and things are not looking better.

"Discharge to the sanitary system ranges between 50,000 and 150,000 gallons per day with an annual estimated discharge of 26,500,000 gallons. If a tissue digester is utilized for carcass disposal a small percentage of the effluent stream would have the following composition. BOD (mg/L) 10,250 COD (mg/L) 19,600 Suspended Solids (mg/L) 1,400 pH 9.48 it is anticipated that a dilution level acceptable to the local sewer district would be achieved based on the total effluent discharge from the facility. This would be confirmed as part of the detailed design phase."

This amount of discharge will overload our already overloaded system. We need a new wastewater facility plant, but none is on the horizon. NBAF will not help matters any in this regard, and this could be a major biohazard problem. The lack of water based on extreme drought conditions in this area does not provide enough water to "mix" the wastewater coming from the proposed NBAF facility. This is one of the most fundamental issues precluding the safe operation of such a facility in Athens. Why you haven't been informed of this is very worrisome.
Chapter 2 - Comment Documents

WD0674

19J.2
Re: siting document data, 25 July 2008: There are considerable air quality problems stemming from boiler and generator emissions that have not been modeled in this DEIS document; tons upon tons of particulates will be sent into Athens air as printed in the 25 July document. This does not include incineration particles (nor the stench associated with such a facility). This is a major problem, as Athens is hardly in compliance with air quality standards, and the proposed NBAF emissions will definitely send it non-compliance. Therefore, I do not see that air quality is "not likely to be affected."

"Noise effects would be similar for all sites, although residential or recreational receptors near the South Milledge Avenue Site ... may be more likely to be affected."

13. Sewer
Run between 25 million and 30 million gallons of treated wastewater per year.

Based on the 25 July 2008 siting document the proposed facility could potentially run almost 300 million gallons of water through it a day, isn't this a low estimate for our sewage systems that is posted in the Executive summary?

14. Geology and soils.
Not addressed, focus on excavation of soils...due to site clearing;...the Athens site is located on bedrock, indicating extensive and expensive blasting would ensue in bedrock, not soils, to build the facility, causing major noise level problems, enhanced air quality problems, increased site exposure into the Middle Oconee River, and destruction and/or modification of wetlands without any mitigation mentioned; in addition, fracturing of such bedrock to allow water to flow through it, potentially allowing for more sources of non-point pollutants.

"It is not anticipated that prime or unique farmlands would be affected, although coordination with the NRCS is not complete.

14G.2
The proposed Athens siting is within farmland on the UGA campus, the fact that an EIS for farmland/pastureland/wetland was not done is unacceptable; the public has not been informed. Up to 520,000 square foot structure to be built in this area...

15. Biological Resources.
"The clearing would remove approximately 30 acres of vegetation, although all of the sites have been previously disturbed to some degree. Wetlands would be affected at the South Milledge Avenue Site from road and utility crossing (less than 0.5 acres) and approximately 0.2 acres of forested uplands would be lost. Threatened or endangered species, aquatic resources, and wildlife would not be directly affected by construction or normal operations at any site. An accidental release of pathogens from the NBAF would adversely affect selected wildlife populations."

None of these statements have been addressed in the body of the EIS document as per EPA guidelines for NEPA (1999 on NEPA website: EPA Considering environmental monitoring for EIS statements). Deforesting 30 acres of vegetation located adjacent to the Middle Oconee River would have deleterious affects on stream ecology where over 90 species of macroinvertebrates reside (Grunbaugh and Wallace, 1995, Limnol. and Oceanogr.: 40: 490-501). These macroinvertebrates provide the major food source directly or indirectly for mammals including humans, reptiles, amphibians, birds, fish, and other invertebrates in this region. Further, the Middle Oconee River is where Athens draws most of its drinking water.
DHS notes the commentor's statement.

DHS notes the commentor’s concerns regarding the effects of construction on bedrock in the area. 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. The proposed NBAF developed footprint will reduce the allowable area for groundwater recharge, however preliminary design parameters such as pervious pavement and stormwater reuse will minimize the effect. 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.

Comment No: 13 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 the results included in construction management approaches. If blasting is required, efforts 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 materials, and delay configurations all to mitigate potential noise levels. The current design does not include use of groundwater resources; however, a basement structure could alter on-site groundwater flow patterns. Any facility infrastructure located in the basement area would be contained in the event of a spill or leak.

Comment No: 14 Issue Code: 26.0
DHS notes the commentor's statement. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ’s regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives.

Comment No: 15 Issue Code: 13.2
DHS notes the commentor’s concern regarding potential effects on the Middle Oconee River adjacent to the South Milledge Avenue Site. As indicated in Section 3.8.3.2, the NBAF would affect primarily pasture areas consisting of non-native cultivated forage grasses. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian buffer; however, impacts to the forested area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian buffer would be preserved, and would continue to provide an effective buffer for the Middle Oconee River.
The EIS has not addressed the impact of removal of 30 acres of riparian and woodlands that are now protecting part of the Middle Oconee watershed region, in terms of providing water, filtering such water, and reducing silation to the river. An "accidental release of pathogens" and its effects on this watershed system has not been addressed.

16. Cultural Resources. "No effects to cultural resources are expected to occur with construction or operation of the NBAF at any site. Consultation with state and federally recognized Native American Indian tribes has been initiated."

How can they find "no effects" when they haven't even inquired if there are cultural artifacts on this site? Because the Middle Oconee River is an archaeologically-important river, humans tend to live on rivers, it stands to reason that they could be altering an archaeological site. The fact that such a study was not done is a breach of the pubic trust in the federal government, and since UGA is government land, the public has a right to know.

17. Socioeconomics: Operation of the NBAF would result in 250 to 350 direct jobs and an estimated income of between $26.8 million and $30.4 million annually. "Losses could be particularly severe in states where animal and crop production is concentrated. For example, Iowa, North Carolina, and Minnesota produce 53% of the total U.S. swine production."

If foot and mouth disease is accidentally or intentionally released from this facility, it is estimated by the EIS that it would cost GB 100 million dollars to lost reveng and other factors. What NBAF will potentially make pale in comparison to what Athens-Clarke County could lose (and the state of GA), not to mention the town of Watkinsville. We already know that most of the direct jobs will go to the Plum Island scientists and staff, so what will Athens be gaining to help the impoverished people? Not very much. UGA, however, would gain a lot, but only a few select groups of people. Also, if an outbreak occurs here, North Carolina will also be shut down. What will be the collateral costs be? We don't know, as they aren't in this report. The FMDV outbreak at the high-level biocontainment labs at Pirbright in 2007 show that the collateral costs are great, but the full amount has not been tallied as of yet.

18. Existing Hazardous, Toxic, and Radiological Waste. The proposed Athens site has not been evaluated for the existence of hazardous waste, etc. It was recently found that the State Botanical Garden had repositories of hazardous wastes, so why hasn't the proposed NBAF site been evaluated as well? If the construction will take place in a watershed area of the Middle Oconee River, this would be important to know. This is a grave oversight, and needs to be undertaken.


Another FMD outbreak occurred in Surrey, England, in August 2007. An epidemiological investigation report concluded that the live virus release was most likely from the drainage system...It is believed that the virus was carried offsite...Estimates of direct costs for a FMD outbreak in the U.S. similar to the United Kingdom outbreak run as high as $24 billion, with the destruction of about 13 million animals. Even a single case of the disease would cause our trading partners to ban imports of live animals and animal products from the U.S. and could result in losses of between $6 billion and $10 billion per year while the country eradicated the disease and regained disease-free status (GAO 2005)."

Comment No: 16 Issue Code: 14.2
DHS notes the commenter's statement. The Georgia Department of Natural Resources, Historic Preservation Division has determined that no historic or cultural resources would be affected by the NBAF at the South Milledge Avenue Site and compliance of the provisions under Section 106 has been completed and compliance with the consultation provisions of Section 106 of the National Historic Preservation Act has been achieved. A copy of the agency correspondence is provided in Appendix G of this NBAF Final EIS.

Comment No: 17 Issue Code: 15.2
DHS notes the commenter's concern. The risk of an accidental release of a pathogen is low, but DHS acknowledges that the possible economic effect would be significant for all sites. The potential economic effects including those from an accidental release are discussed in Appendix D and Section 3.10.9 of the NBAF EIS. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as $4.2 billion until the U.S. was declared foreign animal disease free.

Comment No: 18 Issue Code: 18.2
DHS notes the commenter's concern about existing hazardous waste contamination. Section 3.12 of the NBAF addresses existing hazardous, toxic, or radiological waste contamination at all of the candidate NBAF sites. The methodology used to prepare the section is presented in Section 3.12.1 and information for the South Milledge Avenue Site is in Section 3.12.3. Based on the information provided by the Phase I environmental site assessments performed for the South Milledge Avenue Site, DHS concluded in Section 3.12.3.2 that "no construction or operational impacts are anticipated due to existing hazardous, toxic, or radiological waste contamination."
income. These losses have not been figured into the current EIS document. Even England had to stop their soccer, rugby matches, and even postponed a national election because of a foot and mouth outbreak in 2001.


A.) "The results indicate that for all sites the risk was none to low for all accident scenarios except an over-pressure fire, where an explosion would occur due to the buildup of a large amount of gas or flammable chemical in an enclosed area. The risk for an over-pressure fire accident was moderate for all sites. For all sites except the Plum Island Site, the overall risk rank was moderate due to the potential easy spread of a disease through livestock or wildlife. The risk rank for the Plum Island Site was low or none due to the low likelihood of any disease getting off of the island." In addition to BSL-4, the NBAF would have animal biosafety level-4 (ABSL-4) in which special biocontainment features are used to conduct research involving high-consequence livestock pathogens in large animal species. In this document, BSL-4 refers to both BSL-4 and ABSL-4. "Diseases affecting livestock could have significant impacts on the U.S. economy and consumer confidence in the food supply (GAO 2001)." Accounts of laboratory-acquired infections (LAI) are not a federal requirement. As a result, the collected data have necessarily been incomplete (Schell 2006; CDC and NHC 1999). Also, it has been suggested that these reports might under-represent the true number of LAI because they do not account for subclinical (asymptomatic) infections. Collection of accurate data regarding LAI continues to be hampered by an indifference to and, frequently, an unwillingness to report these incidents" (in part "due to fear of reprisal and the stigma associated with such events" (Harding and Byers 2000; Harding and Byers 2006)."

There is no oversight of the proposed NBAF facility, which is a very real risk, affecting students and citizens of Athens-Clarke County. Given the lack of self-policing as discussed by the DEIS (see above quote), this is one of the most dangerous problems. The Harvard Crimson in 2007 had this to say about a Boston University bio-safety infringement:

"addition to concerns about the facility itself, Boston City Councillor Charles H. "Chuck" Turner '62 said at the meeting that he lacked confidence in BU’s safety procedures. Turner referred to a 2006 incident in which three BU researchers fell ill after unknowingly handling a contaminated strain of the bacterium tularemia. However, according to the Boston Globe, BU officials did not report the illnesses to the Boston Public Health Commission until 28 days after DNA analyses revealed the strains under study had been contaminated. The Globe also revealed that BU failed to update its proposal for a BSL-4 lab which claimed that BU labs had experienced no laboratory-acquired infections in more than 10 years, after the infections had been discovered."

B.) The DEIS Appendix B (June 2008) outlines that incidents are "decreasing", it is not convincing given the previous sentence saying that such incidents are under-reported. Further, the GAO has detailed many lapses at the Plum Island site, but these are not discussed in the DEIS. Please document those lapses in lab safety from the Plum Island facility and why the GAO had to investigate the lab.

C.) It is clear from the EIS statement that the safest place for such a facility housing a BSL3Ag/BSL4 lab is either on an island or a remote desert somewhere far away from people, livestock, out of prevailing winds and watersheds that provide drinking water. Even Plum Island is too close to the mainland for such a proposed facility. Risks involving a BSL-4/ABSL-4 lab were not modeled for this report, and thus, the public has no way of knowing what the risks really are. If such a leak occurred, intentionally or accidentally, from any of the labs that have been built since 2001, including the proposed mainland citing of NBAF, this is of greater risk because the pathogens will be here, right in downtown Athens. One of
the reasons given for the Anthrax scare is that the scientist was worried about funding; the Anthrax scare allegedly gave this person lots of funding. Human error and maintenance problems are the chief causes of leaks at high-level biosafety labs.

D.) DEIS appendix E-70: "Under proper laboratory procedures, the likelihood of a worker inhaling or otherwise becoming exposed (e.g., through cuts in the skin or ingestion) to an infectious agent should be low."

This is an unsupported statement, please explain why this is, when most lab incidents that I am aware of are caused this way (including needle/knife pricks).

E.) DEIS appendix p. E-70: "Workers would receive annual physical examinations and consultation about biological work hazards, and recommended vaccines would be administered by the medical staff."

The DEIS outlines that almost all the diseases to be studied at the NBAF facility have no vaccines or cures; this is a misleading statement suggesting to the public that this facility is absolutely safe for medical personnel and others working there. Please modify this statement to remind people that there are no vaccines for most of these diseases.

F.) DEIS appendix E 3.4.2: "FMDV and Nipah virus are not considered as having a biological vector transmission."

Any animal can be a biological vector, not just ticks, etc. According to the CDC: "The natural reservoir for Hendra virus is thought to be flying foxes (bats of the genus Pteropus) found in Australia. The natural reservoir for Nipah virus is still under investigation, but preliminary data suggest that bats of the genus Pteropus are also the reservoirs for Nipah virus in Malaysia".

Bats are biological vectors of transmission for Nipah. If animals aren't vectors, then what is an infectious disease? The DEIS statement is misleading to the public as to the true nature of transmission of these serious, fatal diseases.

Later, in appendix E, there is this statement: "FMDV spreads quickly through herds and flocks of susceptible animals. With an incubation period of as little as 12 hours, the disease can spread quite rapidly. Cattle are often considered to act as indicators because of the low infectious dose, sheep act as maintenance hosts, and swine act as amplifiers of FMDV. The livestock and wildlife (deer and boar) in the vicinity of the proposed site provide ample opportunity for FMDV to establish in the environment upon a release. FMDV can persist in the human upper respiratory tract for up to 48 hours, making humans potential vectors if they are exposed. In addition, the ability for FMDV to be spread by fomites and with the large human population in the area, the ability for FMD to spread over large areas also exists. The consequences of a large release of FMD virions would be as severe as that of RVFV or Nipah virus in this area."

So any animal is a vector, but this is buried in the Appendix section where most of the public won't read it. I welcome this statement, but it is contradicted in earlier statements. Please tell the public that vectors can be any animal, including humans, which is why this facility is very dangerous if located within highly populated areas with students, farm animals, and wildlife next to a river.

G.) DEIS appendix E 3.4.4: "Humidity greater than 60% and temperatures less than 80°F have been shown to be the most favorable conditions (Garner 1995). (for viral transmission) Georgia is just perfect for this scenario, which makes citing NBAF in Athens not a good choice. A drier, colder or hotter environment would be much better for containment if such vectors escaped. Also, the bovine galleon pneumonia and FMDV don't need many "virions" to
Walker, Sally

Page 13 of 14

WD0674

The DEIS models only model escape of pathogens using the Gaussian Plume Model; are there other ways that aerosols can escape the proposed facility, via fomites or within respiratory tracks of workers? That hasn't been modeled.

K.) DEIS appendix E: 3.4.5. Water transmission: "Also, none of the effluent water from the wastewater plant will contribute directly to any potable water source."
Where is the Data?

L.) Appendix E, E 4.0: “BSL-4 (Section 1.1, page 4) – (Note: there is little information available on this stage except for that represented by the figure in Section 4.4, page 8, so the 75,290 ft² = 61 employees was used)."

M.) Site security. Site security is not really mentioned; how will the site be secured? What types of security clearance do people have to work on such a facility? How long do those clearances take (one fellow said at the Public meeting it took him a year to gain clearance). More worrisome is why two pages of "site security" are blacked out on the NBAF sitting report dated July 25 2008.

DHS notes the commentor's question. Level of difficulty associated with weaponization of the pathogen refers to the process of going from acquisition of a pathogen to the ability to use it to infect susceptible species.

DHS notes the commentor's question. The complete text in the paragraph states, "Thus, given roughly 600 employees handling pathogens in a facility operating a nominal 2,000 hours per year (50 weeks per year at 40 hours per week) and assuming that there are on the order of hundreds of opportunities to mishandle pathogens in a given year per person, this yields on the order of 6×10⁵ opportunities per employee-year. Controls such as proper training, qualification, procedure use, PPE use, and quality assurance, to name just a few, significantly mitigate (reduce the frequency of human errors) the number accidents that actually happen given this high number of opportunities that exists.

DHS notes the commentor's statement. All pathogenic wastes will be sterilized prior to being discharged into the municipal sewage treatment systems, but no holding ponds or sludge-drying beds are anticipated with the final design of the NBAF.

DHS notes the commentor's statement. The risk assessment and methodology described in Appendix E and Section 3.14 represents a reasonable, conservative, and well-thought approach to determine hazards associated with potential accidental releases.

DHS notes the commentor's statement. The section of Appendix E cited by the commentor explains how the number of animals and staff that could be handling or exposed to pathogens were estimated. This information was used to determine the number of opportunities to mishandle pathogens for the operational accident scenarios. The assumptions used in calculating the number of employees provided a conservative number of employees as not to underestimate the number of opportunities.

Based on the table, p. E-165, Georgia appears to be like all the other sites (except Plum Island), which is entirely suspect given that it is in a very different climate zone and potential vectors/hazards compared to the other sites (except perhaps North Carolina). If all the data results are the same, there is something wrong with the model or the model was not run properly.

M.) Site security. Site security is not really mentioned; how will the site be secured? What types of security clearance do people have to work on such a facility? How long do those clearances take (one fellow said at the Public meeting it took him a year to gain clearance). More worrisome is why two pages of "site security" are blacked out on the NBAF sitting report dated July 25 2008.
21. Environmental justice. This is not discussed in the proposal, although it is listed in Table ES-3.

“The priorities assigned to the pathogens identified in these recommendations (FMD, Nipah and Hendra viruses, and emerging pathogens) were based on the following criteria:

• Economic impacts;
• Virulence and potential for pathogen spread;
• Zoonotic potential;
• Morbidity or lethality of disease;
• Ability of terrorists to naturally acquire or otherwise manufacture a particular pathogen; and
• Level of difficulty associated with weaponization of the pathogen.”

What does “Level of difficulty associated with weaponization of the pathogen” mean? Please explain.

Finally, if Plum Island is closed, where does this facility get relocated? "North American FMD Antigen Bank [located at Plum Island] This bank stores concentrated FMD antigen that can be formulated into a vaccine if an FMD introduction occurs. The bank is owned by Canada, Mexico, and the United States. FADDL employees are responsible for safety and potency testing of new lots of antigen and periodic quality testing of stored antigen."

Thank you! Please do not bring NBAF to Athens.
DHS notes the commentor's support for the Flora Industrial Park Site Alternative.
Wallace, Peggy

Page 1 of 1

August 24, 2008

Yes. This is Peggy Wallace and I'm calling from [redacted] Georgia. I only want to say that I am very much in favor of the NBAF locating here. And would like, you know, that to go on record.

That's all I have to say.

Thanks.

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

From: [Redacted]
Sent: Thursday, August 21, 2008 4:59 PM
To: NBAFProgramManager
Subject: NBAF in Manhattan, Kansas

This email is to show my support for selecting Manhattan as the site for the NBAF site. We have the resources and the talent to make it successful.

John Walters

It's only a deal if it's where you want to go. Find your travel deal [here](http://www.example.com).
Warner, Janet

Comment No: 1 Issue Code: 25.0
DHS notes the commentor’s opposition to the Umstead Research Farm Site, Texas Research Park Site, and Manhattan Campus Site Alternatives due to their location near livestock.

Comment No: 2 Issue Code: 21.0
The NBAF would be designed and constructed using modern biocontainment technologies, and operated by trained staff and security personnel to ensure the maximum level of worker and public safety and least risk to the environment in accordance with all applicable federal, state, and local laws and regulations.

Comment No: 3 Issue Code: 15.0
The potential effects to livestock-related industries is discussed in Section 3.10. As noted in Section 3.10.9 and Appendix D, the major economic effect from an accidental release of a pathogen would be a ban on all U.S. livestock products until the country was determined to be disease-free. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

To Whom It May Concern:

I would like to submit the below comments regarding the proposed National Bio and Agro-Defense Facility.

After comparing the six proposed NBAF facility sites with a map of cattle and hog farm locations I think it becomes clear that it would be completely irresponsible to locate the facility at either the Butner, NC; San Antonio, TX, or Manhattan, KS sites. The Butner site is adjacent to one of the largest hog farm concentrations in the country and the San Antonio and Manhattan sites are in the middle of the central US cattle region.

While I am sure the proposed facility would be designed with every safeguard available, no absolute guarantee can be given that organisms will never escape. Imagine the devastation that would be caused if such an event were to happen. Imagine how foolish and irresponsible the US government would look for locating such a facility near a major livestock area.

Thank you,

Janet Warner
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative in favor of the Plum Island Site Alternative.

See response to Comment No: 1.

DHS notes the commentor's views on risk. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NABF, would enable the NABF to be safely operated with a minimal degree of risk, regardless of the site chosen. Section 3.14 and Appendix E of the NABF EIS investigate the chances of a variety of accidents that could occur with the proposed NABF and consequences of potential accidents. DHS cannot guarantee that the NABF would never experience an accident; however, the risk of an accidental release of a pathogen from the NABF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Section 3.10.9 and Appendix D of the NABF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

DHS notes the commentor's concerns regarding the drought concerns and acknowledges regional drought conditions. As described in Section 3.7.3.1 of the NABF EIS, the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water, an amount that is expected to be approximately 0.76% of Athens 15.5 million gallons per day usage. The NABF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes' annual potable water usage. Section 3.7.3.1 describes the 3 onsite surface water stream segment features including the adjacent Middle Oconee River. Sections 3.7.3.2 and 3.7.3.3 describe the potential construction and operational consequences including standard methods used to prevent and mitigate potential spills and runoff affects.

DHS notes the commentor's concerns regarding negative environmental impacts of siting the NABF at the South Milledge Avenue Site. As described in Section 3.8.3.1.1, DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 of the NABF EIS, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NABF. However, construction and normal operations of the NABF would have no direct impact on the State Botanical Garden as indicated in Sections 3.8.3.2 and 3.8.3.3.
has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF.
Comment No: 1  Issue Code: 24.2
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

Comment No: 2  Issue Code: 15.2
As stated in Section 2.2.2 of the NBAF EIS, the NBAF may be operated as a Government Owned/Government Operated Facility (GOGO) or as a Government Owned/Contractor Operated Facility (GOCO). DHS has not made this determination.

---

From: Cathianne Watkins
Sent: Saturday, August 16, 2008 7:40 AM
To: NBAFProgramManager
Subject: NBAF in Athens

Dear DHS,

I was unable to attend the meeting in Athens Thursday, but I wanted you to know that I support locating the research facility in Athens. I believe the potential risks are very small compared to the benefits of increased job opportunities, scientific research collaborations and highly educated residents. Please do not be thwarted by our over-zealous protestors who seem to be stuck in another era. My only quibble is that it would be preferable to staff the lab with federal employees rather than contractors.

Thank you for your consideration,
Cathianne Watkins

"He is rich or poor according to what he is, not according to what he has." - Henry Ward Beecher