

Wigstrom, Sharon

Page 1 of 1

PD0324

August 25, 2008

Hi.

My name is Sharon Wigstrom. We own, my husband and I, Larry, own [REDACTED] Inc., which is just 15 miles northeast of [REDACTED]. We have been in business since we were married 45 years ago, and we have built up a cow herd that we are pretty proud of. In fact, we won second place in a carcass contest that was nationwide about four years ago.

- 1) 25.4 | The new bio building that you're talking about in Manhattan is not only scary, but it is
2) 21.4 | about freaking some of us people out that live very close, because those diseases are
horrible and if they get into our cow herd and our feed lot, it's going to be a deadly,
3) 15.4 | deadly, disaster. You know they say it's a minimal risk but anything can happen. We
know all about accidents. We lost a little child on our farm 30 years ago. So we know all
about mishaps that aren't suppose to happen, but they do. And we don't need that with
the center of Kansas being the heart of cattle country, and the State of Kansas depends a
lot on the incomes and the resources that come from the cattle industry here.

Cattle and grains are about all that Kansas really has. It's grass and it cannot be utilized without cattle. So, we just think it's totally ridiculous and we do not...and are not in favor of that being placed in Manhattan.

- 4) 24.1 | I think it needs to be off, out there on Plum Island. You know Kansas does have
5) 21.4 | tornados. I don't know how many I've seen in my 66 years, but it's been a lot, a lot more
than New York has seen and tornados are horrible. We went through Oklahoma City
shortly after the F5 hit down there. We were headed for harvesting down there, and it
actually picked highways up. It pulled the cement out of the ground. So, if a tornado hit
Manhattan and like I said, I've seen several right there where I live, that didn't come to
the ground, but it's possible. So, it's a terrible danger.

- 1 cont. | 25.4 | We do not need this facility in our backyard. We strongly urge people to look at this
seriously and consider all the pros and cons.

Thank you.

Good bye.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern regarding a disease outbreak resulting from a pathogen release. 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. 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. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The potential economic effects of an accidental release are discussed in Section 3.10.9 and Appendix D. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the economic effect would be significant for all sites. As described in Section 3.8.9.1, depopulation control measures could be undertaken given a worst-case scenario to prevent a widespread outbreak among wildlife and domestic livestock, should an accidental release of the foot and mouth disease virus occur. To the extent possible, the NBAF EIS identifies differences in the magnitude of potential adverse impacts among the candidate sites if an accidental release of a pathogen were to occur.

Comment No: 3 Issue Code: 15.4

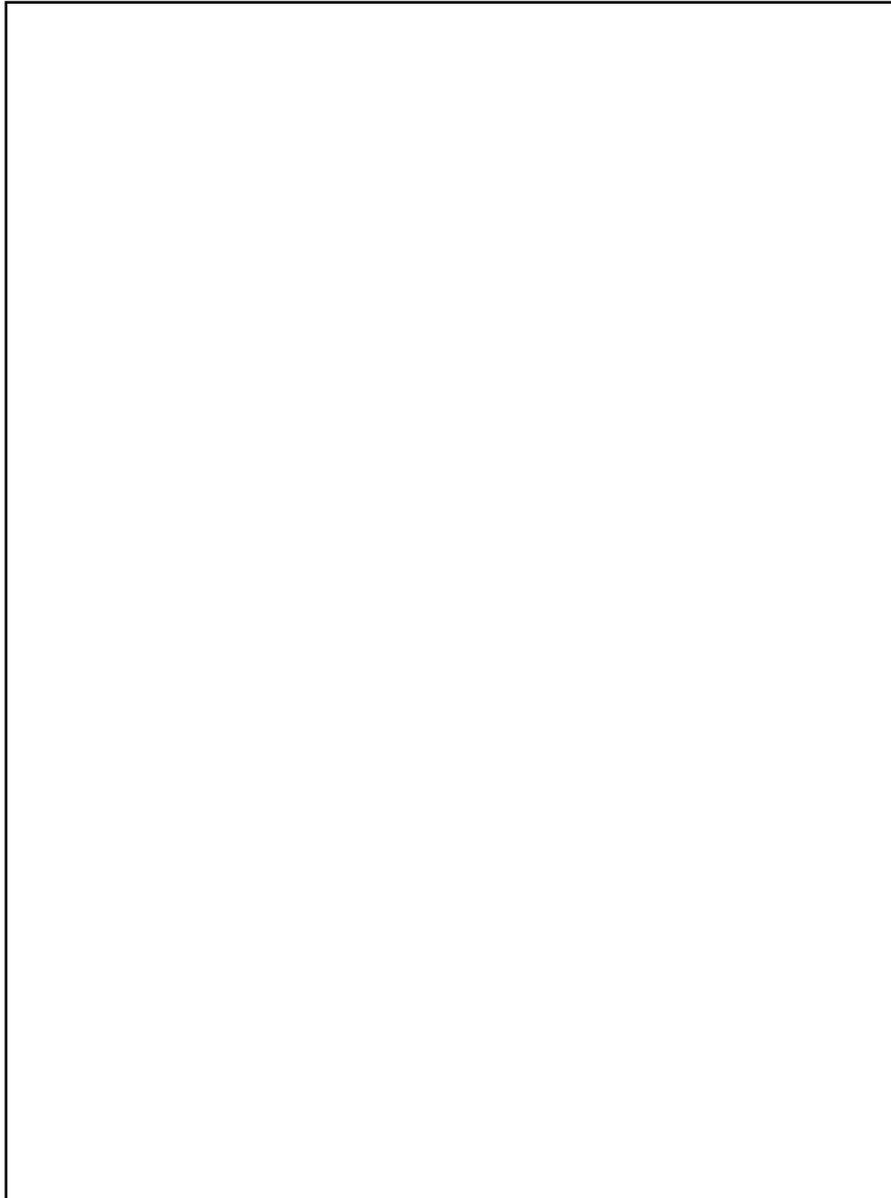
DHS notes the commentor's concern. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible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

Comment No: 4 Issue Code: 24.1

See response to Comment No: 1.

Comment No: 5 Issue Code: 21.4

DHS notes the commentor's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility,



more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500-year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado. Section 3.10.7.1.3 describes local response capabilities and Section 3.14.4.5 describes an accidental release's site-specific consequences.

Wilde, Edward

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WD0690

From: edward wilde [REDACTED]
Sent: Monday, August 25, 2008 10:09 AM
To: NBAFProgramManager
Subject: DEIS South Milledge Avenue Sit

1|25.2; 2|13.2 I would like to express my dismay at the possibility that NBAF might be built at the South Milledge Avenue site in Athens, Georgia. I am not opposed to NBAF, and not opposed to its being built in Athens, but the site next to the State Botanical Garden is an absurd choice. This site was offered at the last minute by the University without sufficient thought being given to the potential impact on a unique and valuable state resource. The description in the DEIS of the impact on the Botanical Garden, even though understated, is to my mind sufficient to disqualify the South Milledge Avenue site as a possible location for NBAF.

Thank you - Ed Wilde

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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: 13.2

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

Wilde, Susan

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WD0086

From: susan wilde [REDACTED]
Sent: Monday, July 21, 2008 2:07 PM
To: NBAFProgramManager
Subject: opposed to NBAF

1| 25.2| I am writing to voice my opposition to locating NBAF in Athens, Georgia. In addition to my concerns
 2| 21.2| about possible pathogen escapes and the fact that we are in drought conditions with very little water to
 3| 12.2| spare, the acreage that has been offered for the facility lies in an important wildlife area and should not
 4| 13.2| be built on. The site is in the middle of an Audubon Society designated 'Important Bird Area' or IBA.
 Audubon selects areas for IBA designation that are heavily used by birds for breeding, wintering, feeding
 and migrating. Migrating birds tend to make their migrating flights at night navigating by the stars. Their
 flyways are often bodies of water, such as rivers. Lighted buildings cause trouble for night-flying
 migrants. They become disoriented by light and often collide into the buildings. Studies have shown that
 hundreds of birds can be killed or injured in a single night at just one building. The proposed NBAF
 building would be sited along a river in the middle of this Important Bird Area. High security measures
 will necessitate that it be brightly lit and, therefore, a danger to hundreds of birds whose habitat would
 be encroached on. NBAF should not build on this land, and should not come to Athens, Georgia.

1 cont.| 25.2|

Susan Wilde
 [REDACTED] Georgia

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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

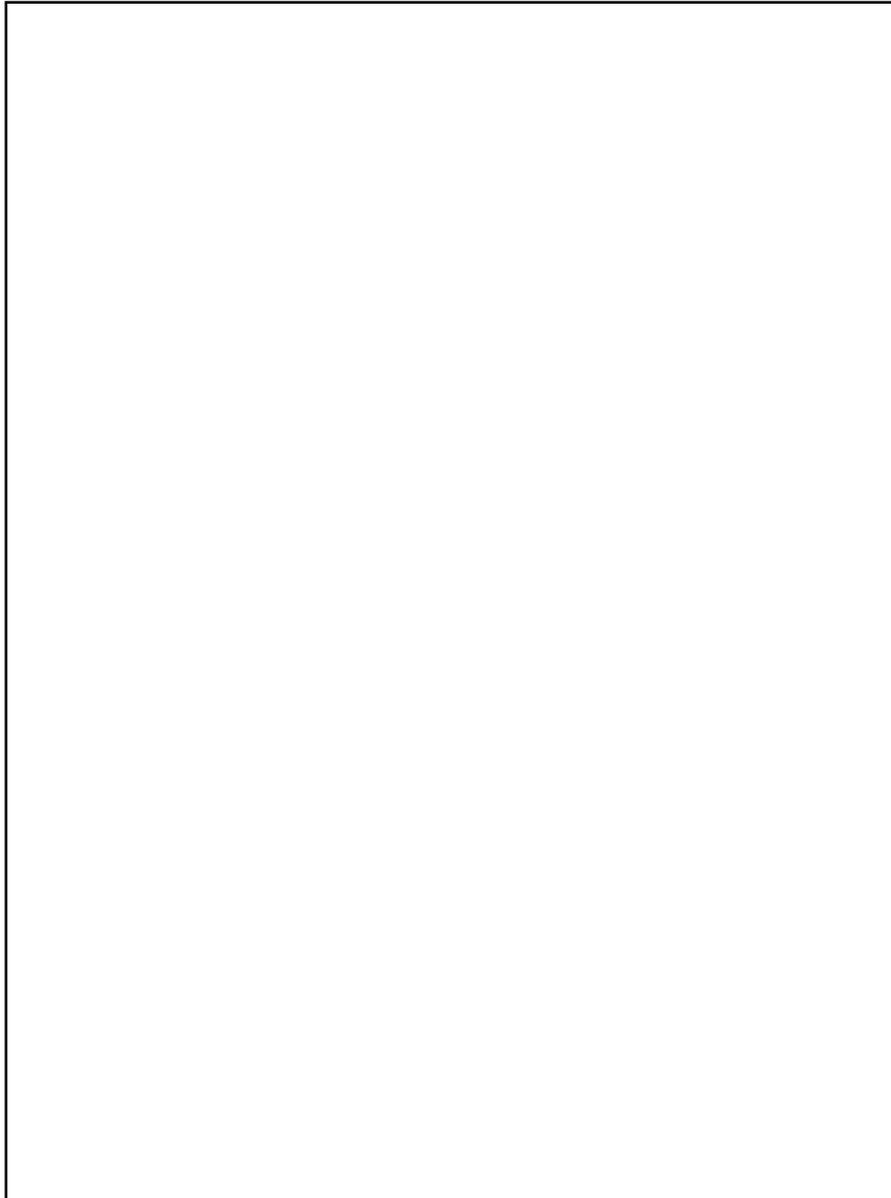
DHS notes the commentor's concern regarding the safe operation of the NBAF. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and consequences of those accidents. Accidents could occur in the form of procedural violations (operational accidents), 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.

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water an amount that is approximately 0.76% of Athens current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes. As described in Section 3.7.3.1.1, available potable water sources are the Middle and North Oconee Rivers and the Jackson County Bear Creek Reservoir.

Comment No: 4 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to an Important Bird Area (IBA). As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the IBA. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the Botanical Garden and Whitehall Forest. Security requirements at the proposed NBAF would require continuous outdoor nighttime lighting. Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigation measures, such as the use of



shielded lighting, will be considered in the final design of the NBAF. Given the relatively low profile of the building and the use of mitigation measures, significant lighting impacts on migratory birds would not be likely to occur. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Wilde, Susan

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WD0740

From: susan wilde [REDACTED]
Sent: Monday, August 25, 2008 2:13 PM
To: NBAFProgramManager
Subject: nbaf

1|25.2;
 2|12.2

I want to express my opposition to building the NBAF on the proposed site in Athens, GA. Such a huge facility should not be located adjacent to The State Botanical Garden of Georgia, which is an Audubon Society 'Important Bird Area'. Also, Georgia has been experiencing extreme drought conditions for several years now. I'm concerned about the many gallons of water required to operate this facility. We are all being asked to conserve water here. We don't have water to spare. Please, do not locate in Athens, GA.

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Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's 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.

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

Williams, Cheryl and Dannie

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MD0141

August 20, 2008

Mr. Johnson,

1|25.2

I had written a letter earlier stating my opposition to the bio research facility in Athens. Until the public meetings I wasn't aware of the ecological importance of the site proposed. Even though Clarke County is smallest in area in the state, there are many other possible sites that would be less environmentally sensitive. So for this reason alone, you should reject the Athens site.

I have been in contact with the Sierra Club and Earthjustice about this matter and both, particularly Earthjustice, have shown interest. Protracted litigation could tie things up for a very long time, hopefully until a more clear thinking presidential administration is in place.

Respectfully,



Dannie Williams

[REDACTED]
[REDACTED] Georgia [REDACTED]

Comment No: 1

Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative based on its ecological importance. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden or Important Bird Area (IBA). The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with the IBA. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high-value forested riparian corridor would be preserved; and therefore, the NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and the IBA.

Williams, Danna

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WD0043

From: Danna Williams [REDACTED]
Sent: Monday, July 07, 2008 1:37 PM
To: NBAFProgramManager
Subject: Opposed to NBAF in Athens, GA

To Whom It May Concern:

1/25.2;
2/24.1

I am writing to express my strong opposition to locating the proposed NBAF lab in Athens, GA. I am a life-long resident of [REDACTED] and it is very upsetting to me to think that a lab that is so dangerous might actually be built here. I've heard all the comments about how safe it will be, but all it takes is one accident which could devastate the area. We don't need this lab in Athens and we really don't need it on the mainland. Upgrade Plum Island and keep it off the mainland! A vast majority of [REDACTED] residents DO NOT want this lab here.

Thank you.
Danna L. Williams

[REDACTED]
GA [REDACTED]

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the South Milledge Avenue Site Alternative in favor of the Plum Island Site Alternative. 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: 2 Issue Code: 24.1

See response to Comment No: 1.

Williams, Danna

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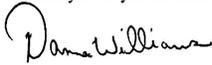
GAD017

August 13, 2008

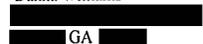
To Whom It May Concern:

- 1| 25.2 This is a letter expressing my extreme opposition to the proposed National Bio and Agro-Defense Facility project. I, along with a majority of citizens of Athens-Clarke County as well as the State of Georgia, do not want this site constructed here. Ideally this site should not even be moved to the mainland. Common sense should dictate to leave it on Plum Island. It's been said that Plum Island needs renovation, so by all means, spend the money that would be spent building a new and less safe facility on the mainland to renovate the existing, safer site already present.
- 2| 5.2
- 3| 12.2 Georgia has been experiencing a severe drought for some time now and there is no conceivable reason that it will get better. This facility will use vast quantities of water that would be better used for the citizens of Athens. Additionally, the proposed site is very close to the Oconee River. This vastly increases the chance of contamination in case of an accident, not only polluting the environment itself, but the drinking water source for Athens.
- 4| 13.2 This site is also in an area that contains livestock, and wildlife as well. Many, if not all, of the diseases being studied at the proposed NBAF site are infectious to livestock and wildlife. Culling thousands of cattle would be bad enough, but what if the disease escaped into the whitetail deer population? How would you stop its spread? Research will also be done on diseases that are spread by mosquitoes. In case you weren't aware, mosquitoes are rampant in the south. Imagine infected mosquitoes accidentally being released in this climate? How would you combat it?
- 5| 19.2 Accidents will always happen, no matter how many safety precautions are in place. It's called human error. Accidents at facilities like these have happened in the past and are certain to happen again. I, and many others, don't want them to happen in the town I live in or anywhere else, for that matter.
- 6| 15.2 Very few, if any, high level jobs will be created in the Athens area. The vast majority of research jobs will be filled by people already working at Plum Island. The ones that will be filled by Athens citizens will be lower level, minimum wage jobs as "animal caretakers." These jobs will in no way help the economy of this town. It would be just as good for these people to work at a discount store, gas station, or cinema. The pay would be about the same and the job would be much safer.
- 7| 21.2 Additionally, this facility will also make Athens-Clarke County a possible terrorist target. It would be so easy for any deadly disease to be spread among the population with the proposed site so close to residences and businesses.

Thank you for your consideration,



Danna Williams



GA

Comment No: 1

Issue Code: 25.2

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

Comment No: 2

Issue Code: 5.2

DHS notes the commentor's opposition to the five mainland site alternatives. The existing Plum Island facility does not have BSL-4 laboratory or animal space and is inadequate to support such space and mission requirements. Upgrading the existing facilities to meet the NBAF mission would be more costly than building the NBAF on Plum Island as discussed in Section 2.4.1 of the NBAF EIS.

Comment No: 3

Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water an amount that is approximately 0.76% of Athens current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes. Section 3.13 describes the NBAF's potential liquid and solid waste management options and Section 3.7.3 describes standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 4

Issue Code: 13.2

DHS notes the commentor's concern regarding the potential effects of an accidental release on white-tailed deer and other wildlife in the vicinity of the South Milledge Avenue Site. The potential response measures that could be employed in the event of an accidental release are described in Section 3.8.9 of the NBAF EIS. Table 3.8.9-1 describes the potential strategies for response that could be considered in the event of an accidental release. Depopulation or population reduction is one of ten potential FMD response strategies developed by the National Park Service. However, the National Park Service recommends the use of other strategies or combinations of strategies to avoid this strategy (see Table 3.8.9-1). A more likely scenario would include one or more of the non-lethal measures described in Table 3.8.9-1. In the event that depopulation or population reduction was determined to be the most appropriate course of action, hunting with firearms would be the likely method for implementing this strategy. As described in Section 3.8.9, the response to an accidental release of a mosquito-borne pathogen would most likely include aerial insecticide application within the infected area.

Although the NBAF EIS acknowledges the potential for significant impacts on white-tailed deer and other wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern

biocontainment technologies and safety protocols, as would be the case for the NBAF. Furthermore, the purpose of the NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 5 Issue Code: 19.2

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.

Comment No: 6 Issue Code: 15.2

DHS notes the commentor's statement regarding employment. The number of short-term and permanent jobs are discussed in Section 3.10. It is expected that approximately 2,700 direct temporary jobs 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. A portion of the permanent jobs at the NBAF would be filled locally and the household spending by new residents and the operations of the NBAF are expected to indirectly support additional jobs that would be filled by the local labor force.

Comment No: 7 Issue Code: 21.2

DHS notes the commentor's concern that the NBAF would be a prime terrorist target. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (TRA) (designated as For Official Use Only) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Williams, Jerry

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MD0098

JERRY D. WILLIAMS
 REPRESENTATIVE, 8TH DISTRICT
 NEOSHO COUNTY, WESTERN
 CRAWFORD COUNTY AND
 NORTHWEST LABETTE COUNTY
 21225 KIDWA ROAD
 CHANUTE, KANSAS 66720
 DOCKING STATE OFFICE BLDG.
 7TH FLOOR
 TOPEKA, KANSAS 66612
 (785) 296-7690
 1-800-432-3924

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 AGRICULTURE AND NATURAL RESOURCES
 JOINT COMMITTEE ON ECONOMIC DEVELOPMENT

8-12-08

Directorate:
 James Johnson
 DHS Science & Technology
 245 Munnay Lane SW
 Building 410
 Washington, DC 20528

Re: NBAF (Kansas)

Dear Mr. Johnson:

1|24.4 Kansas is the best positioned
 location to accomplish the goals of
 National Bio and Agro-Defense Facility.

2|8.4 Kansas State University is in the heartland
 of America. Animal industry is located
 in Kansas big time. As a Kansas legislator
 I know about the state cost share voted
 on by the Kansas legislature. Last
 there is public support for the (NBAF)
 facility and programs in Kansas and at
 K-State.

cont. | 1|24.4 IN Kansas, it is location,
location and location, for NBAF!!

(NBAF
 Committee
 Member) Thanks,
 Jerry D. Williams
 State Representative

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

Comment No: 2 Issue Code: 8.4
 DHS notes the State Representative's observation. The decision on whether or not the NBAF is built, and, if so, where will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment."

Williams, Kenneth

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WD0729

From: Kenneth Williams [REDACTED]
Sent: Monday, August 25, 2008 1:43 PM
To: NBAFProgramManager
Subject: No to NBAF

1|25.0 | Keep NBAF on Plum Island. While risks of release of pathogens are low, the
2|24.1 | consequences could be catastrophic. The facility needs to be isolated and
| | surrounded by salt water.

Ken Williams
Professor/UGA
Athens

Comment No: 1 Issue Code: 25.0

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

Comment No: 2 Issue Code: 24.1

See response to Comment No: 1.

Williams, Kenneth

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WD0019

From: Kenneth Williams [REDACTED]
Sent: Saturday, June 28, 2008 2:22 PM
To: NBAFProgramManager
Subject: nbaf in Athens, Ga.

1) 5.0 |
2) 25.2 |
Sirs, I would like to go on record as strongly opposing the location of the proposed NBAF facility anywhere on the USA mainland and certainly nowhere near the city of Athens, Georgia.

Kenneth Williams
Professor Emeritus, University of Georgia

Comment No: 1 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 25.2

See response to comment No: 1.

Williams, Ouida

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GAD010



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

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Name: Ouida Williams

Title: _____

Organization: _____

Address: _____

City: _____ State: GA Zip Code: _____

Comments: GAO has concluded that NBAF needs to be on Plum Island. I totally agree!
We do not need this in Athens or anywhere on the mainland. DHS will not find a warm welcome here!

(Continued on back for your convenience)

Comment No: 1

Issue Code: 5.2

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the South Milledge Avenue Site Alternative in favor of the Plum Island Site Alternative based on the U.S. Government Accountability Office report (May 2008). DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable it to be safely operated on the mainland. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island 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.

Comment No: 2

Issue Code: 25.2

See response to Comment No: 1.

115.2

2125.2

Williams, Ouida

Page 1 of 1

WD0794

From: [REDACTED]
Sent: Monday, August 25, 2008 4:58 PM
To: NBAFProgramManager
Subject: no to NBAF in Athens

- 1) 25.2 | There are so many reasons why I do not want NBAF in Athens. Location, location, location....this is
not the right site. NBAF should be on an island,certainly not in such an accessible spot next to Georgia's botanical
2) 5.2 | garden surrounded by neighborhoods and a school. Many Athenians feel strongly about this and are willing to
continue and escalate the fight if we should be chosen. Why is the report and advice of GAO being ignored?

Ouida Williams

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: 5.2

DHS notes the commentor's suggestion that the NBAF be built on an island. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island 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 suseptible wildlife species. As described in Section 2.3.1, DHS's site selection process incorporated site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or sem-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF.

Williamson Family, Williamson Family

Page 1 of 1

WD0696

From: Studdard [REDACTED]
 Sent: Monday, August 25, 2008 10:32 AM
 To: NBAFProgramManager
 Subject: Fw: No Bio-Lab PLEASE!!!!!!!!!!!!!!!!!!!!!!

From: LEIGH WILLIAMSON [REDACTED]
 To: nbafprogrammanager@dhs.gov
 Sent: Sunday, August 24, 2008 6:50:38 PM
 Subject: No Bio-Lab PLEASE!!!!!!!!!!!!!!!!!!!!!!
 706-769-1547

1|25.0 |As residents of a nearby neighborhood we adamantly oppose a bio-lab being built near our
 homes.We along with 20 other families have children and know the possibilities of what could
 happen in the event of an accident or war times!
 2|21.0; |I know you would not want this type of lab next to your home and we don't either.Because of our
 close proximity to this potential lab-we would get the worst effects should anything ever happen
 (and we all know it does happen!)
 3|5.0 |Please consider another place-far from humans and animals. There are many remote areas that
 would suit this type of lab and our backyard,should not be a one of them.

We appreciate you allowing us to voice our concern. Please honor it. The Williamson Family

Comment No: 1 Issue Code: 25.0

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

Comment No: 2 Issue Code: 21.0

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.

Comment No: 3 Issue Code: 5.0

DHS notes the commentor's suggestion. As described in Section 2.3.1 of the NBAF EIS, DHS's site selection process incorporated site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the 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.

Willich, Frederick

Page 1 of 1

WD0452

From: [REDACTED]
Sent: Friday, August 22, 2008 3:29 PM
To: NBAFProgramManager
Subject: NBAF, Manhattan, KS

To whom it may concern:

1| 24.4

I am a business owner in [REDACTED] Kansas and am pleased that we are a candidate for the location of the National Bio and Agro-Defense Facility at Kansas State University. We are a vibrant community and possess an exceptional quality of life with heart felt relationships with near by Fort Riley, K-State, the surrounding communities, and our State Legislature. We extend a welcome to you and wish to be a partner to your NBAF team and offer support unlike any you've ever experienced.

Sincerely,

Frederick W. Willich

Comment No: 1 Issue Code: 24.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative. The decision on whether or not the NBAF is built, and, if so, where will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Willis, Rosemary

Page 1 of 1

PD0341

August 25, 2008

1| 25.2 | I oppose the building of the National Bio and Agro Defense Facility in Athens. For one
 2| 13.2 | reason, it will take four years to construct. It's proximity to the State Botanical Gardens
 of Georgia it's just too close to a beautiful scenic area. It will disturb the birds and other
 wildlife along the river there.

3| 12.2 | It will take....require extra water, which we are in dire need of now. We're running on
 4| 8.2 | shortage, and it will be extra sewer lines, and I do not believe it would be a safe building
 to be built this close to the residents of Clarke County.

5| 15.2 | I think that it is a bad thing to come, or if it comes to Clarke County, I think it will be a
 bad thing. It will ruin property values and it will not bring forth the economic results that
 some politicians think it might.

Thank you very much. My name is Rosemary Willis. I live in [REDACTED] Georgia, in close
 proximity to the proposed site.

Thank you.

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: 13.2

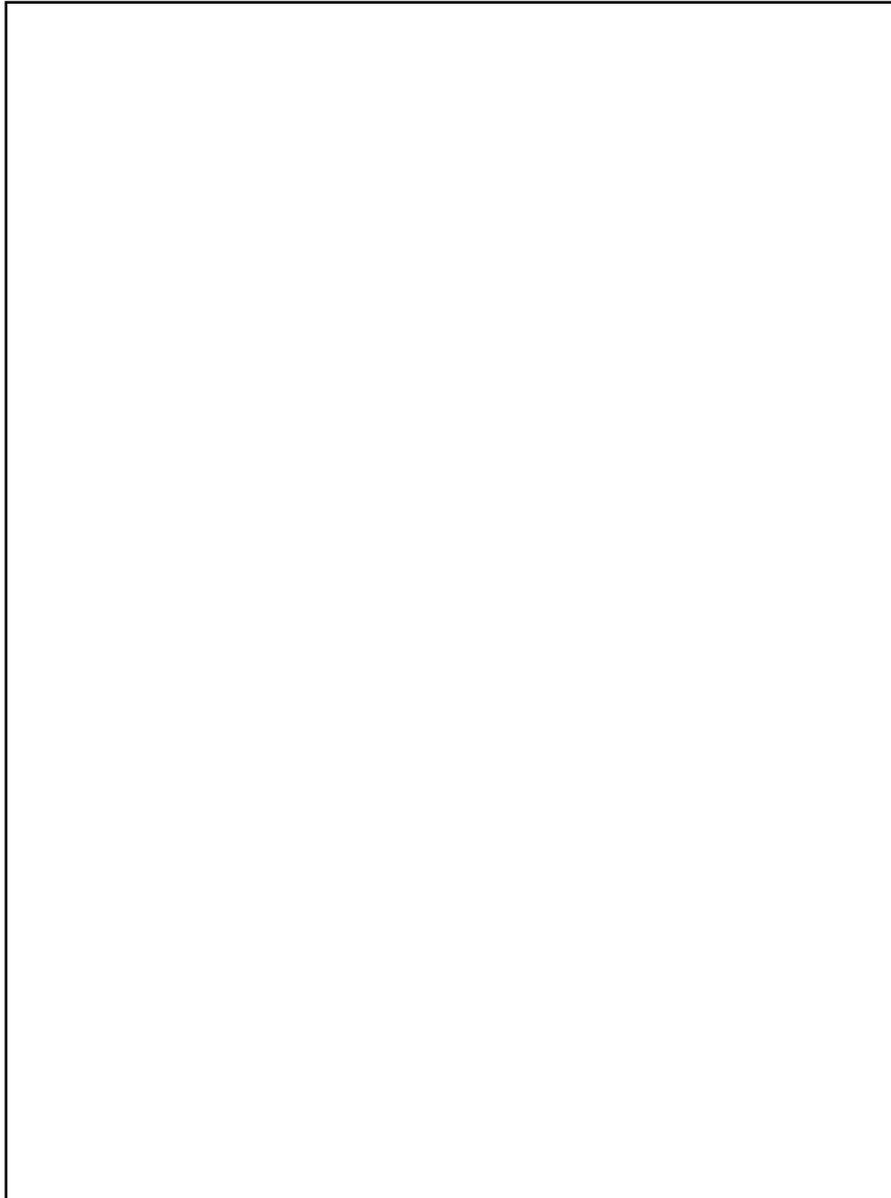
DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would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

Comment No: 3 Issue Code: 12.2

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

Comment No: 4 Issue Code: 8.2

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 on the potable water supply and infrastructure is presented in Section 3.3.3 of the NBAF EIS. Based on planned improvements, no potable water infrastructure constraints have been identified. 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 presented in Section 3.7.3.

DHS also notes the commentor's concern about the Athens-Clarke County Public Utilities Department's ability to treat NBAF wastewater. The impact from operation of the NBAF on the local sanitary sewage system capacity and infrastructure is discussed in Section 3.3.3.3.4. The design and operation of the NBAF would prevent negative impact to the wastewater treatment facility infrastructure and treatment capabilities. Specifically, as summarized in Section 3.15, 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: 15.2

DHS notes the commentor's concern regarding property values and economic impact. A discussion of the effects of the NBAF on property values is presented in Section 3.10.3 of the NBAF EIS, which concluded that there is no empirical evidence that a facility such as the NBAF would reduce property values in the study area. It is possible that with the relocation of highly skilled workers to the immediate area, property values could increase due to an increase in demand. Labor income during construction is projected at approximately \$150 million while operation of the NBAF would generate approximately \$28 million in wages annually.

Wilson, Blake

Page 1 of 2

09/25/2008 12:08 FAX 801 353 0247 NEC/PEF/LM 2001-002
FD0067

**FACSIMILE
COVER
SHEET**

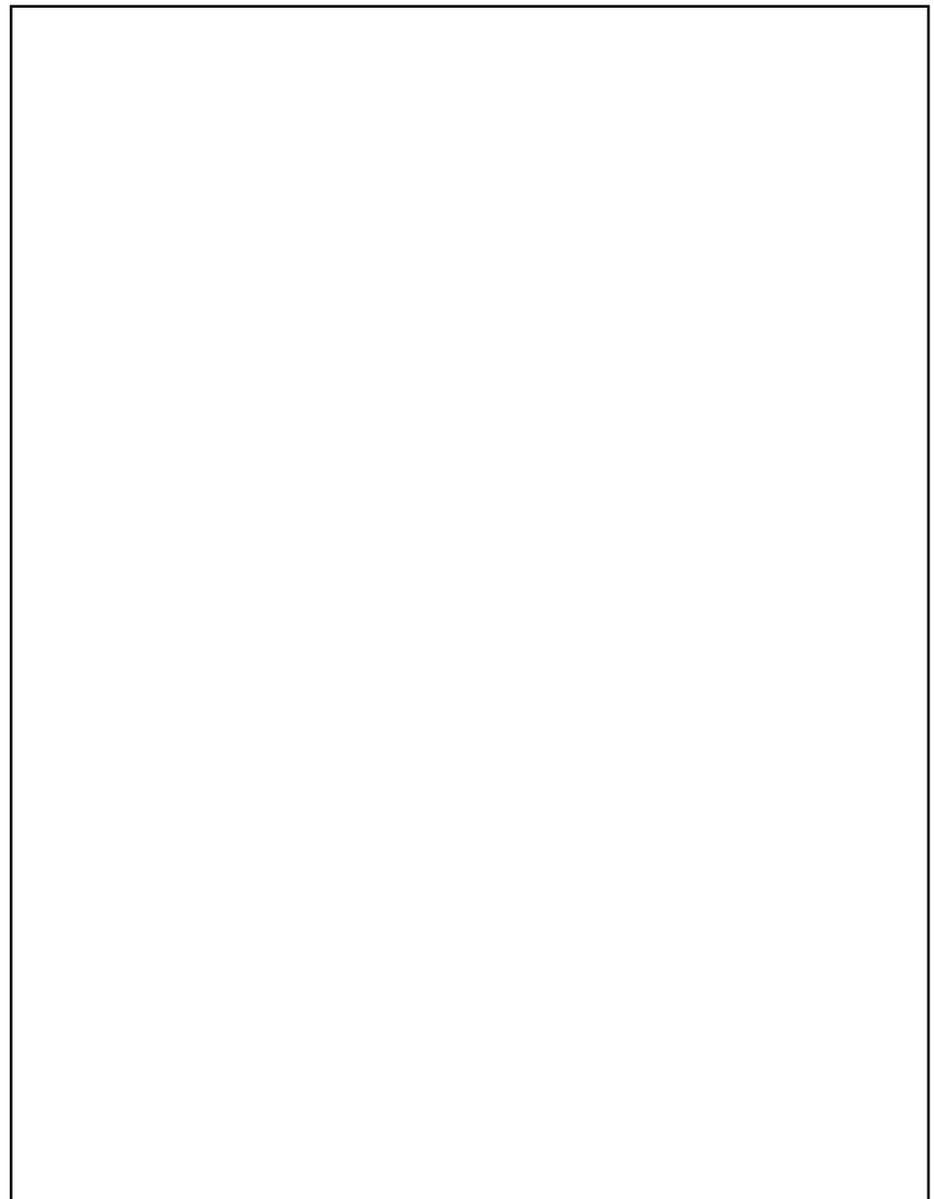
**MEC CHAMPIONS
FOR MISSISSIPPI'S FUTURE**

Date: 8-25-2008
Number of Pages: 2

TO: Dept. of Homeland Security
FAX NUMBER: 1-866-588-6223
FROM: Mississippi Economic Council
Message: Letter of support for National IIR + Aero-Defense
Facility to locate in Mississippi

SHOULD YOU HAVE ANY PROBLEMS RECEIVING THIS FACSIMILE,
PLEASE CALL 1-800-748-7626 or 601-969-0022 In Central Mississippi

Post Office Box 23276 • Jackson, Mississippi 39225-3276
248 East Capitol Street, Suite 940 • Jackson, Mississippi 39201
Phone 1-800-748-7626 or 601-969-0022 in Central Mississippi
Fax 1-888-717-2809 or 601-353-0247 in Central Mississippi



Wilson, Blake

Page 2 of 2

08/25/2008 12:07 FAX 601 353 0247 MEC PEF/LX 002/002
FD0067

Advocacy Research Resources Leadership

August 25, 2008

Secretary Michael Chertoff
U.S. Department of Homeland Security
Washington, DC 20528

Dear Secretary Chertoff:

The Mississippi Economic Council, the State Chamber of Commerce, supports the efforts of the Gulf States Consortium to locate the National Bio & Agro-Defense Facility in Mississippi.

The teamwork and cooperation between all parties involved in this project is a perfect example of many of the great things that are taking place in Mississippi. Our state has been at the forefront of economic development, attracting a variety of industries that are creating new high-tech, high-paying jobs.

The research capabilities of the Mississippi universities involved in the National Bio & Agro-Defense proposal is unsurpassed. These institutions already have an outstanding track record of technology transfer, as a great deal of research and development is currently being used in commercial applications. There are also numerous examples of industries – ranging from automotive to defense – that have partnered with state institutions of higher learning for ongoing research and development.

Mississippi has a ready workforce and excellent workforce training abilities. Also, the site near Flora meets and exceeds the necessary criteria, and there is unprecedented community support for this project.

The merits of the Mississippi site are numerous, and if given full consideration, it is obvious that Mississippi would be the ideal location for the National Bio & Agro-Defense Facility.

Sincerely,



Blake A. Wilson
President & CEO

MISSISSIPPI ECONOMIC COUNCIL – THE STATE CHAMBER OF COMMERCE
M.E. Swynze Educational Foundation Leadership Mississippi STAR Student Teacher Awards
Affiliates: Public Education Forum of Mississippi Mississippi Scholars
P.O. Box 23276, Jackson, MS 39226-3276 245 E. Capitol Street, Suite 940, Jackson, MS 39207
601-992-0022/1-800-748-7826 FAX: 601-352-0247/1-888-717-2509 www.mec.ms

Comment No: 1 Issue Code: 24.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative. The decision on whether or not the NBAF is built, and, if so, where will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Wilson, David

Page 1 of 2

CD0102

From: David J Wilson [djw1s0n@sbcglobal.net]
Sent: Tuesday, July 15, 2008 7:17 AM
To: NBAFProgramManager
Cc: Pittsfield Union Grange
Subject: Relocation of Plum Island animal disease research facility

Dear Homeland Security Secretary Chertoff,

It is my understanding that the U.S. government has circulated proposals to relocate the Plum Island Animal Disease Center to a location on the mainland United States. I find this appalling.

1) 24.1 | I am writing to you today in support of a National Bio-and Agro Defense Facility that is geographically
 2) 25.0 | isolated as much as possible from the environmental, commercial and civic infrastructure of the mainland,
 3) 5.0 | such as the Plum Island facility. I strongly oppose the development of an animal disease research facility
 on the United States mainland that works with live strains of Foot and Mouth Disease (FMD) viruses as
 well as other virulent foreign animal diseases (FADs) anywhere near existing concentrations of
 commercial livestock.

4) 15.0 | I believe the economic risks of a potential outbreak of FMD to the nation's food supply and to family
 5) 21.0 | farmers and ranchers across the nation with commercial livestock operations will vastly outweigh the
 advantages the government has put forth to justify their proposals to bring this critical and sensitive
 research back to the mainland and away from the isolated island research facility where it has been
 successfully conducted for more than fifty years. While there are many possible scenarios for the
 outbreak of animal diseases that would pose a significant economic risk to farmers and ranchers as well
 as to their surrounding rural communities and their natural environments, few come close to the
 nightmare of an outbreak of FMD in dramatically impacting many aspects of American life.

4) 15.0 cont. | There is no known cure for FMD once it has been contracted. Once the disease is loose on the mainland
 U.S., it would almost certainly require mass slaughter and disposal of tens of millions of individual
 carcasses of domestic and wild animals to control the outbreak. It would undoubtedly disrupt the domestic
 and international sale of meat and meat products throughout the nation for months or even years. The
 ancillary costs to general commerce, outdoor recreation, and impacts on future investments in the
 livestock sector by farmers and ranchers would exceed the extremely conservative USDA estimate of \$60
 billion in direct costs by several fold.

We need not speculate about this scenario. Recently Great Britain experienced two outbreaks of FMD
 that have been attributed to a release from bio-research facilities working with FMD. An outbreak
 in 2001 caused at least \$16 billion in damages, devastated the rural economy, and nearly caused the
 government to fall. The experiences in Great Britain lead any reasonably prudent person to conclude that
 conducting federal research on dangerous animal diseases on the U.S. mainland is a risk we must not
 take.

5) 21.0 cont. | Even if an outbreak never occurs, I am concerned that a mainland facility would become an inviting target
 for espionage and terrorist or criminal attacks aimed at breaching the physical and procedural barrier built
 into the facility and getting these pathogens out of the laboratory to eventually be released into the
 environment. My concern is that a facility located on the mainland would attract an extremely broad range
 of terrorist and/or criminal organizations to use an attack on the facility to advance their goals.

1) 24.1 cont. | I believe that geographic isolation at the Plum Island Research facility remains a prudent, cost effective
 means of adding essential security to the facility and the vicinity. I also strongly believe that the selection

Comment No: 1 Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative. Other locations to construct the NBAF were considered in Section 2.4.3 of the NBAF EIS. These alternatives were considered but eliminated from detailed study in the EIS based on the evaluation criteria calling for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. These alternatives included remote locations such as an island, desert, or arctic habitat distant from populated areas or inhospitable to escaped animal hosts/vectors.

Comment No: 2 Issue Code: 25.0

DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 5.0

See response to comment No: 2.

Comment No: 4 Issue Code: 15.0

DHS notes the commentor's concern. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. As noted in Section 3.10.9 and Appendix D of the NBAF EIS, the major economic effect from an accidental release would be a potential 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.

Comment No: 5 Issue Code: 21.0

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

8/5/2008

Wilson, David

Page 2 of 2

CD0102

1) 24.1 cont. process for a research facility of this nature has under-appreciated the need for geographic isolation of a facility like this as a prudent, reasonable, and cost effective security measure that will assure our nation a world class bio- and agro research facility and will also assure that this facility will not pose a risk to our food supply and to rural communities in which tens of thousands of farmers and ranchers live. Thank you.

Sincerely,

David J. Wilson
Pittsfield Union Grange
11544 Quirk Road
Belleville, MI 48111
djw1s0n@sbcglobal.net

David J. Wilson
11544 Quirk Road
Belleville, Michigan 48111
(734) 699-7623

Wilson, Greg

Page 1 of 1

WD0755

From: Greg Wilson [REDACTED]
Sent: Monday, August 25, 2008 3:12 PM
To: NBAFProgramManager
Subject: NBAF Public Comments

As a student at the University of Georgia, I drive by the south milledge avenue site everyday and it is within less than a mile of my current home.

1|24.2 | It does not scare me at all, while some people in Athens would like the Department of Homeland Security to think that the entire community and student population is opposed to NBAF. I can confidently say that is not true, most students are not opposed to NBAF, but understand that it serves a purpose and trust that it can be done safely.

There are atleast 4 BSL-3 labs in Athens, and no one complains that West Nile or other dangerous pathogens are studied there.

Please do not let a small vocal minority sway this process and please let the merits of the site and not politics decide this process. If you choose another site than Athens, then please do it because it was more qualified and not because of politics or they offered more money.

Athens has a strong research community, is located close to Atlanta, a good place to live and raise a family, and would suit the National Bio and Agro-Defense facility well.

Thanks

GW

Greg Wilson

A.B. Political Science
[REDACTED]

Comment No: 1 Issue Code: 24.2

DHS notes the commentor's support for the South Milledge Avenue Site Alternative. The decision on whether or not the NBAF is built, and, if so, where will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Wilson, Russell

Page 1 of 1

WD0544

From: Russell Wilson [REDACTED]
Sent: Monday, August 25, 2008 5:13 AM
To: NBAFProgramManager; letters@themercury.com
Subject: Locating a level 4 lab in or near Manhattan, KS

To the Program Manager of the NBAF and the Editor

1| 27.0 My initial impulse is to yell out, "ARE YOU CRAZY?" But, of course, that would get us no where. Correct me if I am wrong but isn't Foot and Mouth Disease the same thing that we called hoof and mouth disease when I was living in England? I was a witness to its virility and the virus's release was not a technical problem, but a human error, sad to say.

2| 21.4 Just how many accidental releases have occurred at Plum Island? We know of three. How many others do we not know of? We've been told that all of the accidental releases were caused by human error. Since the most complex cog in the environmental machine is the human factor, that would seem reasonable. However, these accidents point to the the one item that has not been discussed, the fail safe theory. This theory states, that the more complex a system is, the more likely it is to fail. Eventually, an accidental release is going to occur whether it is caused by human error or technological breakdown. It is not a question of IF, it is a question of WHEN.

Many of our local proponent agencies point to the Center for Disease Control (CDC) in Atlanta and their spotless record for controlling some of the most dangerous viruses known to man. However comparing the NBAF's track record to the CDC's is akin to comparing the Bureau of Land Management's Dam construction and maintenance to that of the Army Corp of Engineers. In short, the NBAF's, like the BLM's track record leaves a lot to be desired.

This isn't a Mall, this isn't the East Side Development where no one is likely to get sick or die. This is a dangerous lab that will be studying the most dangerous viral diseases of the animal world. Viruses mutate all the time, how long before one can cross over to humans, and how long before it escapes? Are we destined to repeat the 1918 Influenza Pandemic again? This time with a deadlier strain of who knows what?

3| 15.4 If this issue was put to a general vote in this community, I feel that you would be told not to come back. However, too many influential and moneyed locals have dollars signs in their eyes and cannot see the looming disaster that a Level 4 lab can be. I personally would not want to see what happened in the UK happen here in the Flint Hills. Should this Lab come here, I like many others will vote with our feet and leave. While our adversaries are already saying good riddance, they need to consider what is going to happen to the local housing market and the local tax base if a large portion of this community does leave.

4| 5.4 But none of this needs to happen. I have a better idea! Locate this lab north of Topeka and let's see how long it would take to get built! My bet is that it would never happen.

Russell D. Wilson M.S. EM
 [REDACTED]
 [REDACTED] KS

Comment No: 1 Issue Code: 27.0

DHS notes the commentor's experience in England regarding hoof and mouth disease, which is the same as foot and mouth disease.

Comment No: 2 Issue Code: 21.4

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.

Comment No: 3 Issue Code: 15.4

DHS notes the commentor's concern. Section 3.10.4 discusses the effects of the proposed NBAF at the Manhattan Campus Site on housing but does not take into consideration unpredictable secondary impacts of the NBAF on housing in the region.

Comment No: 4 Issue Code: 5.4

DHS notes the commentor's suggestion. DHS's alternative site selection process is described in Section 2.3.1 of the NBAF EIS. Decisions on whether to construct and operate the NBAF and, if so, where will be based on the analyses presented in the NBAF EIS and other factors such as cost, engineering and technical feasibility, strategic considerations, policy considerations, and public input.

Winfield, P. Christopher

Page 1 of 1

WD0723

From: PCH Winfield [REDACTED]
Sent: Monday, August 25, 2008 1:11 PM
To: NBAFProgramManager
Subject: Granville County Home and Small Business Owner opposing NBAF proposal

1|25.3 Hello, I spoke at a Raleigh City Council meeting back in November 2007 giving some of my safety concerns with the proposal to place a NBAF site in Butner. I have read and researched more since November, but still oppose the proposal on safety grounds.

2|12.3; I do not think this type of research should be done near the primary water supply of the state
 3|21.3 capitol of North Carolina. Were an accident or act of terrorism to occur at such a site, the potential risk to human and animal life is enormous.

4|5.0 Sirs, if you must perform this type of germ research, please consider remote desert or small-island locations far from continental US population centers. Thank you for your consideration!

 P. Christopher Winfield, Manager
 [REDACTED]
 [REDACTED] NC [REDACTED]

Comment No: 1 Issue Code: 25.3

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

Comment No: 2 Issue Code: 12.3

DHS notes the commentor's watershed concern. Section 3.13.8 of the NBAF EIS describes the waste management processes that would be available to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects. The NBAF would be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management.

Comment No: 3 Issue Code: 21.3

DHS notes the commentor's concern regarding safe operation of 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 and impacts to area animal populations (socioeconomics) is included in Section 3.10.9 and Appendix D.

Comment No: 4 Issue Code: 5.0

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

Winkler, Michael

Page 1 of 1

WD0724

From: [REDACTED]
Sent: Monday, August 25, 2008 1:13 PM
To: NBAFProgramManager
Subject: No, to the proposed site of NBAF in Athens, Georgia

Attn: NBAF Program Manager,

1|25.2 I am writing to oppose the planned NBAF facility on land adjacent to the State Botanical Garden
of Georgia. NBAF is unwelcome on this site. Athens has "infrastructural" problems, and an
"on-going" drought, of which the City, and University of Georgia cannot effectively deal. We
2|8.2 are certainly not able to currently address further "infrastructural" problems which might be
created if NBAF were to be built on the current proposed site. The University of Georgia has not
been able to address the major sewage, and drought problems, nor has Athens Clarke County
Unified Government. The University does not have a good record of dealing with a new similar,
veterinary school facility, that just recently finally managed to make it on-line after many years..

3|2.0 The Mayor, who is aggressively pursuing NBAF on the sixty-seven acre site does not want to
listen to many in her constituency. She, rather than listen to any discussion, simply says, "I don't
want to hear anything negative." The Mayor's statement and position characterizes her attitude
from the day she took office. She, like the head of the Athens Chamber of Commerce, was
essentially hand chosen by the towns power structure to do the bidding of those in control..

We all wish to see the University of Georgia, and Athens Clarke County Unified Government
jurisdictions do well, but not at the expense of those residing in Athens, and or, attending the
University of Georgia..

1|25.2 I have made a far gone conclusion that you are going to place the NBAF facility wherever you
(cont.) wish. All I can say, or ask, is please do not put your facility in Athens, especially adjacent to the
State Botanical Garden of Georgia..

"No to NBAF."

Cordially,

Michael Winkler

[Get the MapQuest Toolbar.](#) Directions, Traffic, Gas Prices & More!

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative and acknowledges the proximity of the 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.

Comment No: 2 Issue Code: 8.2

DHS notes the commentor's concern regarding the adequacy of the utility infrastructure to support the NBAF operation. Section 3.3.3 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. Any needed infrastructure improvements to ensure service reliability would be identified in accordance with the final facility design.

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

Comment No: 3 Issue Code: 2.0

DHS is committed to free and open public involvement during development of the NBAF EIS and welcomes comments. DHS's decisions on whether the NBAF should be built, and, if so where, will be based on environmental analyses, public and agency comments, mission requirements, national policy considerations, life-cycle costs, site characterization, security, and other programmatic considerations. All comments, both oral and written, received during the comment period, to include this one, were given equal consideration and were responded to in the NBAF Final EIS.

Winkler, Michael

Page 1 of 2

WD0385

From: [REDACTED]
 Sent: Tuesday, August 19, 2008 7:45 PM
 To: NBAFProgramManager
 Subject: Objection to the current proposed site of NBAF in Athens, Georgia

Attention: NBAF Program Manager,

1|25.2 | *I am writing to oppose the currently proposed NBAF site in Athens, Georgia.*

2|6.2 | *For the NBAF facility to be sited near the Georgia State Botanical Garden would, in my estimation, prove not to be advantageous to either, the Garden, nor NBAF.*

3|8.2 | *Athens Clarke County Unified Government, and the University of Georgia have long neglected much needed infrastructure for many years. The "stench" from the sewage treatment facilities even filters to my home on [REDACTED]. Hodgson Hall, on the campus of UGA, along with Ramsey Center, and student housing are terribly affected by the smell of sewage, and particulate matter permeating the air. The local government and UGA have made no effort to alleviate the problem. I get physically ill when I drive down College Station Road. While I realize that NBAF will be a Federal facility, I don't believe Athens Clarke County, nor UGA will change their apathetic complacency in safe guarding the local health of citizens... The NBAF site should be somewhere else, not behind the State Botanical Garden of Georgia.*

4|12.2 | *I want UGA to grow, do well, and prosper, but not at the expense of community health, nor promulgating a further tax on an already long neglected infrastructure. I also sight the current drought, and a severe shortage of available water. Currently I cannot keep my yard adequately watered, and am forced to pay a "premium extra," should I choose to do so.*

5|5.2 | *Place the NBAF off to itself; perhaps a nice pasture property in Watkinsville, Georgia -- Close to UGA campus, and all of Athens, but not a burden for anyone in the very immediate Athens area. Foremost, NBAF needs to be a good citizen while also satisfying the mission of Homeland Security; accomplishing the facility's goals in the area protecting livestock, studying disease and developing vaccines, while also successfully endeavoring to protect the Nation from many forms of bio-terrorism which might ultimately affect animals, and the people of the United States, and those of the Northern, and Southern hemispheres.*

We need to work together for the better solution to satisfy all concerned while safely seeking to accomplish the proposed NBAF facility's prescribed goals, and vital National Security mission.

Please add my comment to the Athens, Georgia, NBAF DEIS official record.

Cordially,

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 6.2

DHS notes the 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, 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.

Comment No: 3 Issue Code: 8.2

DHS notes the commentor's concern about the Athens-Clarke County Public Utilities Department's ability to treat NBAF wastewater. The impact from the operation of the NBAF on the local sanitary sewage system capacity and infrastructure is discussed in Section 3.3.3.3.4 of the NBAF EIS. The design and operation of the NBAF would prevent negative impact to the wastewater treatment facility infrastructure and treatment capabilities. Specifically, as summarized in Section 3.15, pre-treatment of liquid waste streams would be implemented as necessary to meet treatment facility acceptance criteria, therefore avoiding potential impacts.

Comment No: 4 Issue Code: 12.2

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

Comment No: 5 Issue Code: 5.2

DHS notes the commentor's suggestion. The South Milledge Avenue Site was proposed by the local consortium in response to the request for expressions of interest and was considered along with the other submissions. DHS's alternative site selection process is described in Section 2.3.1 of the NBAF EIS.

Winkler, Michael

Page 2 of 2

WD0385

Michael Winkler

It's only a deal if it's where you want to go. Find your travel deal here.
(<http://information.travel.aol.com/deals?ncid=aoltrv0005000000047>)

Winston, James

Page 1 of 1

MD0118

May 18, 2008

US Department of Homeland Security
 att. James V Johnson

Dear Mr Johnson

I have heard many comments about
 NBAF in Butler North Carolina.

1|4.3 I have attended several meetings and it is
 amazing that about 50 people or less
 can create such a mess. In most cases the
 same people speak and march at all the meetings.
 I assure you the great majority of people
 that are in favor of the school project
 are never heard of they don't march protest
 throw things and call other people names.

2|24.3 Please do NOT let a small hand full of
 protesters keep you from coming to Granville
 County there are a huge amount of citizens
 who feel the NBAF project is good and
 we look forward to get this project
 in Granville County NC.

Sincerely Yours
 James P Winston

Comment No: 1 Issue Code: 4.3

DHS notes the commentor's concern that participation in public comment process is not equitable. DHS is committed to free and open public involvement during development of the NBAF EIS and welcomes comments. DHS's decisions on whether the NBAF should be built, and, if so where, will be based on environmental analyses, public and agency comments, mission requirements, national policy considerations, life-cycle costs, site characterization, security, and other programmatic considerations. All comments, both oral and written, received during the comment period, to include this one, were given equal consideration and were responded to in the NBAF Final EIS.

Comment No: 2 Issue Code: 24.3

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

Winters, Judy

Page 1 of 12

WD0836

From: J Winters [REDACTED]
Sent: Monday, August 25, 2008 7:07 PM
To: NBAFProgramManager
Subject: NBAF DEIS COMMENT Aug.25
Attachments: NBAF+DEIS+COMMENT.doc; SGWASANC0058416.pdf

Dear NBAF Program Manager
U.S. Department of Homeland Security Science and Technology Directorate; James V. Johnson,

Please find two attachments
1) comment letter and 2) supportive document.

Thank You,
Judy Winters

Winters, Judy

Page 2 of 12

WD0836

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

Dear NBAF Program Manager,
The following information is my formal comments regarding the National Bio Agro Defense Facility draft Environmental Impact Statement.

- 1|26.0 Due to the significant amount of information, which is, absent from the DEIS, many of my comments are relating to the deficiencies and out-right incorrect information versus comment on a suggested action or procedure. This report is insufficient to comply with NEPA unless the deficiencies are corrected in the FEIS with an additional comment period on said deficiencies. The format makes it needlessly difficult to find subsections.
- 2|4.0 After reading the DEIS I could not help but question how over \$4 million tax dollars were spend on a report with so many errors and omissions. Moreover, these errors and omissions brought into question the entire credibility of the study itself.
- Within the DEIS, your agency omitted any analysis for Central Avenue (SR1103) the most direct route to the proposed site. The DEIS failed to evaluate Central Ave. for any of NEPA's criteria such as affected environment, construction consequences, operation consequences, quality of life, air quality and cumulative impacts.
- 3|15.3 In the DEIS you were confused about which site you were evaluating for instance consider, "3.10.7.1.2 Population and Housing & 3.10.7.1.2.1 Population", "According to population growth trends in the **South Milledge Avenue Site** study area (Granville, Durham, Vance, and Wake Counties), the total population of the study area (all four counties) has increased by 596,423 between 1960 and 2000. Population estimates for 2007 and 2012, the most recent forecasts available, show an additional 411,821 residents are expected to be added to the study area between 2000 and 2012". (Figure 3.10.7.1.2.1-1).
- South Milledge Avenue is not in Granville County nor is it near Durham, Wake or Vance Counties. Additionally, your report stated that daily traffic on Old Highway 75 near the proposed site was 2.2 cars per day and yet the site is 3000 feet southwest from the Butner Federal Correctional Complex. Again, those numbers are wrong and any analysis used in conjunction with these figures needs to be reevaluated and Central Ave., must be evaluated to comply with NEPA.
- 4|15.3 cont. The socioeconomic consequences of a potential accident or release were not sufficiently addressed. No evacuation plans for the more that the 7000 patients and inmates were discussed. Nor were any quarantine measures discussed for the population, incarcerated and or otherwise. The "movement control zone" you refer to at Table 3.8.9-1 —" National Park Service Potential Strategies and Considerations for
- 5|19.3

Comment No: 1 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. DHS attempted to present the information in such a manner to allow the reader to clearly follow and evaluate the information.

DHS notes the commentor's concern regarding Newcastle disease and avian flu. Although originally identified in the Engineering Feasibility Report prepared by DHS as potential research subjects for the NBAF, they have been removed from the list of diseases that would be investigated.

Comment No: 2 Issue Code: 4.0

DHS notes the commentor's opinion regarding the length of the public comment period. Council on Environmental Quality regulation 40 CFR 1506.10(c) requires that a minimum of 45 days be allowed for public comment on the NBAF Draft EIS. A period of 60 days was provided for public review and comment on the NBAF Draft EIS, which spanned from June 27 through August 25, 2008. During this comment period, public meetings were held in the vicinity of the NBAF site alternatives and in Washington, D.C. DHS also accepted comments submitted by mail, telephone and fax lines, and online through the NBAF Web page (<http://www.dhs.gov/nbaf>). All comments, both oral and written, received during the comment period were given equal consideration and were responded to in the NBAF Final EIS.

Comment No: 3 Issue Code: 15.3

Sections 3.10.7.1.2 and 3.11.7.3.1 have been revised.

Comment No: 4 Issue Code: 15.3

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 of 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.

Comment No: 5 Issue Code: 19.3

DHS notes the commentor's concern regarding evacuation plans for all community members, including patients and inmates. Section 3.14 investigates the chances of a variety of accidents that could occur with the NBAF and consequences of those 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 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.

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. 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

Winters, Judy

Page 3 of 12

WD0836

1 cont. | FMD Response" is clearly a socioeconomic and socio-justice issue with civil class-
26.0 | action merit that will be utilized.

5|19.3 | The DEIS states that aerial spraying of pesticides (in a watershed?) may be used to
cont | prevent RVF from becoming entrenched in the environment but yet gives no discussion
on how it would know if an release had occurred. Freq. of spraying etc.

The DEIS must include an exploration of actual proven protocols for emergency
situations, such as animal escapes, fires, facility malfunctions, and medical
emergencies; absent this, it is impossible to adequately assess the risks posed by this
specific facility.

1 cont. | The DEIS states that the daily operation of the URF site does not adversely affect our
26.0 | environment in one section and then in another section of the EIS states that as
previously stated, PM2.5 exceeded the NAAQS at all sites. The EIS is filed with
contradictory statements and analysis with no explanation or rationale.

What pathogens will be studied? Eight depends on which study you read apparently.
The EIS should have also address two other diseases specifically identified in the 350-
page NBAF Conceptual Design and Feasibility Study commissioned by DHS, dated
August 24, 2007. Those diseases are Newcastle Disease and avian flu. This previously
undisclosed fact was confirmed at the DEIS meeting in Butner by a DHS panel member.
Avian flu has specific relevance for North Carolina, given its large commercial poultry
operations and pig farms. No mention of the potential economic consequences of these
pathogen releases from the proposed NBAF were not discussed or evaluated.

4 cont. | Also with the research of the Hendra virus being identified for study you failed to discuss
15.3 | subject of said research. Since the virus affects horses, flying foxes; humans which will
be your subject? The Horse industry and equine population has a huge presence in the
proximity of the proposed site as well as surrounding counties. Potential economic
consequences on the equine population was not evaluated.

The DEIS states that the economic impact of a release of highly transmissible Foot and
Mouth Disease could be "significant" but vastly underestimates the impact at about \$4
Billion dollars, while a release in Great Britain caused more than \$17 Billion in losses.
Grossly underestimating actual cost.

6| 18.3 | The DEIS failed to fully investigate the wastewater treatment capacity of South Granville
Water and Sewer Authority. The fact it is currently operating under a provisional permit,
which is being challenged by several environmental organizations as well as citizens.
(Copy of permit attached to this email). The DEIS fails to evaluate or acknowledge that
7| 12.3 | Falls Lake, the final receiving body of water of the NBAF effluent is considered impaired
by the state of North Carolina and is listed as a 303d water source.

Comment No: 6 Issue Code: 18.3

Section 3.13.2.2 of the NBAF EIS presents the pretreatment methods applicable to liquid wastes that
would be discharged to the sanitary sewer, the pretreatment options and disposition alternatives for
waste solids, and the advantages and disadvantages of the major technologies being considered for
carcass/pathological waste disposal. As shown in Table 3.13.2.2, biological liquid wastes from the
washdown of animal holding areas (which would include feces) would enter a dedicated biowaste
gathering and treatment system. 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)
for the disposal of carcasses and pathological waste.

DHS notes the commentor's concern with regard to wastewater treatment. The impact from the
proposed operation of the NBAF 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, pre-treatment
of liquid waste streams would be implemented as necessary to meet treatment facility acceptance
criteria, therefore avoiding potential impacts.

Comment No: 7 Issue Code: 12.3

DHS notes the commentor's statement. Section 3.7.7 of the NBAF EIS describes the water
resources at the Umstead Research Farm Site alternative including the proposed NBAF's potential
construction and operational consequences. Section 3.13.8 describes the Waste Management
processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7
and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.
The proposed NBAF effluent receiving stream, Knap of Reeds Creek, has been noted as a 303d
listed stream as described in Section 3.7.7.1.1 and the NBAF potable water source will be the Lake
Holt Reservoir upstream from Falls Lake. Also described in Section 3.7.7.1.1, the entire Neuse River
Basin and associated sub-basins have additional protection under the Riparian Buffer Protection
Rules for the Neuse and Tar-Pamlico River Basins, Non Point Source Management Program and
NBAF would have to meet these requirements.

Winters, Judy

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WD0836

6 cont.,
18.3

The DEIS does not discuss the treatment process that will be used to dispose of the daily accumulation of thousands of pounds of infected feces and carcasses. Or how this waste will be tested for release into the local wastewater treatment plant as effluent.

The DEIS does not discuss the method of waste disposal of infected biological and medical waste including carcasses. Incineration, alkaline hydrolysis or rendering affect NAAQS and the environment. However, the EIS fails to take a "hard look" at the environmental consequences of these issues concerning proposed NBAF.

8| 23.0

In closing, I do not feel there is any meaningful information of substance in the DEIS for me to comment any further on. I find nothing in the DEIS that leads me to believe this facility will be safe at all. The DEIS does not address the final design of the facility and seems to say the NBAF will be safe without the hard data to prove it. As supported by the testimony of Dr. Nancy Kingsbury and the Government Accountability Office.

9| 25.3

I will do everything in my power as a resident of Butner, North Carolina the stop this facility's placement in North Carolina and for that matter its placement anywhere.

Judy Winters

[REDACTED]
[REDACTED] NC [REDACTED]Comment No: 8Issue Code: 23.0

DHS notes the commentor's concern regarding the safety of the NBAF. 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: 9Issue Code: 25.3

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

Winters, Judy

Page 5 of 12

State of North Carolina
Department of Environment
and Natural Resources
Division of Water Quality

Michael F. Easley, Governor
William G. Ross, Jr., Secretary
Coleen H. Sullins, Director



May 7, 2008

Ms. Lindsay L. Mize
Executive Director
211 West C Street
Butner, North Carolina 27509

Subject: Draft NPDES Permit
Permit **NC0058416**
SGWASA WTP
Granville County

Dear Ms. Mize:

10| 27.0

Enclosed with this letter is a copy of the draft permit for your facility. Please review the draft very carefully to ensure thorough understanding of the conditions and requirements it contains.

The draft permit contains the following significant changes from your current permit in accordance with our Permitting Strategy for conventional water treatment plants:

- A flow limit of 0.2 million gallons per day has been added. The value was taken as the maximum of average daily flows as reported on your DMRs from 2006 and 2007.
- Flow measurement must be continuous and recorded. An 18-month compliance schedule is provided to allow you time to acquire funding, design, purchase and install a continuous flow recorder. The flow measurement requirement will begin when the flow recorder is installed, but not more than 18 months after the effective date of the renewed permit.
- A composite sample is now required for certain parameters as specified by 15A NCAC 02B .0505 c (3)(B) & (C). An 18 month compliance schedule is provided to allow you time to acquire funding, design, purchase and install a composite sampler. The composite sampling requirement will begin when the composite sampler is installed, but not more than 18 months after the effective date of the permit.
- Monitoring requirements for pH, calcium, magnesium, manganese, fluoride, total zinc, ammonia nitrogen, total copper and Whole Effluent Toxicity monitoring have been added to the permit. These monitoring requirements are from the Division's policy for conventional water treatment plants.
- A Reasonable Potential to Exceed Water Quality Standards was performed per EPA requirements using DMR data for 2006 and 2007. This assessment showed that aluminum and iron have reasonable potential to exceed water quality standards, so limits for aluminum and iron have been added to the permit as a weekly average. A compliance schedule can be provided if the plant needs modification in order to comply with the new limits.

1617 Mail Service Center, Raleigh, North Carolina 27699-1617
An Equal Opportunity Affirmative Action Employer

919 733-5083, extension 595 (fax) 919 733-0719
James.McKay@ncmail.net

Comment No: 10

Issue Code: 27.0

DHS notes the information submitted by the commentor.

Winters, Judy

Page 6 of 12

WD0836

10 cont.
27.0

Concurrent with this notification, the Division is publishing a notice in newspapers having circulation in the general Granville County area, soliciting public comment on this permit draft. **Please provide any comments you may have regarding this draft to DENR – DWQ, NPDES Program no later than 30 days after receiving this draft permit.** Comments should be sent to the address listed at the bottom of this page. If no adverse comments are received from the public or from you, this permit will likely be issued in July 2008 with an effective date of August 1, 2008.

If you have any questions or comments concerning this draft permit, call me at (919) 733-5083, extension 595.

Sincerely,

Jim McKay
Eastern NPDES Program

cc: NPDES files
Raleigh Regional Office / Surface Water Protection
Aquatic toxicology

Winters, Judy

Page 7 of 12

10 cont.
27.0

Permit NC0058416

WD0836

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WATER QUALITY

PERMIT

TO DISCHARGE WASTEWATER UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provision of North Carolina General Statute 143-215.1, other lawful standards and regulations promulgated and adopted by the North Carolina Environmental Management Commission, and the Federal Water Pollution Control Act, as amended, the

South Granville Water & Sewer Authority (SGWASA)

is hereby authorized to discharge wastewater from a facility located at the

SGWASA WTP
Central Avenue off NC Highway 56
Butner
Granville County

to receiving waters designated as an unnamed tributary to Knap of Reeds Creek in the Neuse River Basin in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, III and IV hereof.

This permit shall become effective

This permit and authorization to discharge shall expire at midnight on January 31, 2013.

Signed this day.

DRAFT

Coleen H. Sullins, Director
Division of Water Quality
By Authority of the Environmental Management Commission

Winters, Judy

Page 8 of 12

Permit NC0058416

WD0836

SUPPLEMENT TO PERMIT COVER SHEET

10 cont.
27.0

All previous NPDES Permits issued to this facility, whether for operation or discharge are hereby revoked. As of this permit issuance, any previously issued permit bearing this number is no longer effective. Therefore, the exclusive authority to operate and discharge from this facility arises under the permit conditions, requirements, terms, and provisions included herein.

The South Granville Water & Sewer Authority (SGWASA) is hereby authorized to:

1. Continue to operate a drinking-water treatment plant with a discharge of filter-backwash wastewater. This facility is located at the SGWASA WTP in Butner on Central Avenue off NC Highway 56 in Granville County.
2. Discharge from said treatment works at the location specified on the attached map into an unnamed tributary to Knap of Reeds Creek, classified WS-IV NSW waters in the Neuse River Basin.

Winters, Judy

Page 9 of 12

Permit NC0058416

10 cont.
27.0**A. (1) EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS WD0836**

During the period beginning on the effective date of this permit and lasting until expiration, the Permittee is authorized to discharge filter backwash from outfall 001. Such discharges shall be limited and monitored by the Permittee as specified below:

EFFLUENT CHARACTERISTICS	LIMITS			MONITORING REQUIREMENTS		
	Monthly Average	Weekly Average	Daily Maximum	Measurement Frequency	Sample Type	Sample Location
Flow	0.20 MGD			Continuous ¹	Recording	Effluent
Total Suspended Solids	30.0 mg/L		45.0 mg/L	2/Month	Grab	Effluent
pH ²				2/Month	Grab	Effluent
Total Residual Chlorine			17 ug/L	2/Month	Grab	Effluent
Aluminum		87 ug/L		2/Month	Composite ³	Effluent
Calcium				Quarterly ⁴	Composite	Effluent
Magnesium				Quarterly ⁴	Composite	Effluent
Manganese				Quarterly ⁴	Composite	Effluent
Fluoride				Monthly	Composite	Effluent
Total Zinc ⁵				Monthly	Composite	Effluent
Total Copper				Monthly	Composite	Effluent
Total Iron		1.0 mg/L		2/Month	Composite	Effluent
Ammonia Nitrogen ⁶				Monthly	Composite	Effluent
Total Monthly Flow ⁷		Monitor & Report (million gallons/ month)		Monthly	Recorded or calculated	Effluent
Total Nitrogen (TN) ⁷		Monitor & Report (mg/L)		Monthly	Composite	Effluent
Nitrate/ Nitrite Nitrogen ⁷ (NO ₃ + NO ₂)		Monitor & Report (mg/L)		Monthly	Composite	Effluent
Total Kjeldahl Nitrogen (TKN) ⁷		Monitor & Report (mg/L)		Monthly	Composite	Effluent
TN Load (pounds/ month) ⁷		Monitor & Report (pounds per month)		Monthly	Calculated	Effluent
TN Load (pounds/ year) ⁷		Monitor & Report (pounds per year)		Annually	Calculated	Effluent
Total Phosphorus		Monitor & Report Quarterly Average ⁸ (mg/L)		Monthly	Composite	Effluent
Whole Effluent Toxicity Monitoring ⁹				Quarterly	Composite	Effluent

Footnotes:

1. An 18 month compliance schedule is provided to allow time to obtain funding, procure and install a flow recorder. A continuous flow recorder will not be required until 18 months after the permit effective date.
2. pH shall not be less than 6.0 SU nor greater than 9.0 SU.
3. An 18 month compliance schedule is provided to allow time to obtain funding, procure and install a composite sampler. Grab samples will suffice until a composite sampler is installed, but not more than 18 months after the permit effective date.
4. Monitor in conjunction with toxicity test.
5. Monitoring for zinc is only required if zinc containing corrosion inhibitor is used.
6. Monitoring for Ammonia Nitrogen is required only if chloramination is used.
7. TN Load is the mass quantity of Total Nitrogen discharged in a given period of time. See A. (2) Calculation of TN Loads.
8. The quarterly average for total phosphorus shall be the average of composite samples collected monthly during each quarter (January - March, April - June, July - September, October - December).
9. Chronic 24 hour Pass/ Fail test, *Ceriodaphnia dubia* at 90% conducted January, April, July, October. See Special Condition A.(4). Monitoring for calcium, magnesium and manganese should be conducted in conjunction with Aquatic Toxicity testing.

All samples collected should be from a representative discharge event.
There shall be no discharge of floating solids or visible foam in other than trace amounts.

Winters, Judy

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Permit NC0058416

WD0836

A. (2) CALCULATION OF TOTAL NITROGEN LOADS10 cont.
27.0

a. The Permittee shall calculate monthly and annual TN Loads as follows:

i. Monthly TN Load (pounds/month) = TN x TMF x 8.34

where:

TN = the average TN concentration (mg/L) of the samples collected during the month

TMF = the Total Monthly Flow of wastewater discharged during the month (MG/month). If all discharges are not recorded at the facility, document the calculation(s) used to determine total monthly flow

8.34 = conversion factor, from (mg/L x MG) to pounds

ii. Annual TN Load (pounds/year) = Sum of the 12 Monthly TN Loads for the calendar year

b. The Permittee shall report monthly Total Nitrogen results (mg/L and pounds/month) in the discharge monitoring report for that month. The Permittee shall report each year's annual results (pounds per year) in the December report for that year.

A. (3) TOXICITY REOPENER

This permit shall be modified (or revoked and reissued) to incorporate toxicity limitations and monitoring requirements in the event toxicity testing or other studies conducted on the effluent or receiving stream indicate that detrimental effects may be expected in the receiving stream as a result of this discharge.

Winters, Judy

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Permit NC0058416

WD0836

A. (4) CHRONIC TOXICITY MONITORING (QTRLY)10 cont.
27.0

The permittee shall conduct quarterly chronic toxicity tests using test procedures outlined in the "North Carolina *Ceriodaphnia* Chronic Effluent Bioassay Procedure," Revised February 1998, or subsequent versions.

The effluent concentration defined as treatment two in the procedure document is **90%**. The testing shall be performed as a *Ceriodaphnia dubia* 7day pass/fail test. The tests will be performed **during the months of January, April, July, and October**. Effluent sampling for this testing shall be performed at the NPDES permitted final effluent discharge below all treatment processes.

All toxicity testing results required as part of this permit condition will be entered on the Effluent Discharge Monitoring Form (MR-1) for the month in which it was performed, using the parameter code **TGP3B**. Additionally, DWQ **Form AT-1** (original) is to be sent to the following address:

Attention: NC DENR / DWQ / Environmental Sciences Section
1621 Mail Service Center
Raleigh, N.C. 27699-1621

Completed Aquatic Toxicity Test Forms shall be filed with the Environmental Sciences Section no later than 30 days after the end of the reporting period for which the report is made.

Test data shall be complete and accurate and include all supporting chemical/physical measurements performed in association with the toxicity tests, as well as all dose/response data. Total residual chlorine of the effluent toxicity sample must be measured and reported if chlorine is employed for disinfection of the waste stream.

Should there be no discharge of flow from the facility during a month in which toxicity monitoring is required, the permittee will complete the information located at the top of the aquatic toxicity (AT) test form indicating the facility name, permit number, pipe number, county, and the month/year of the report with the notation of "No Flow" in the comment area of the form. The report shall be submitted to the Environmental Sciences Section at the address cited above.

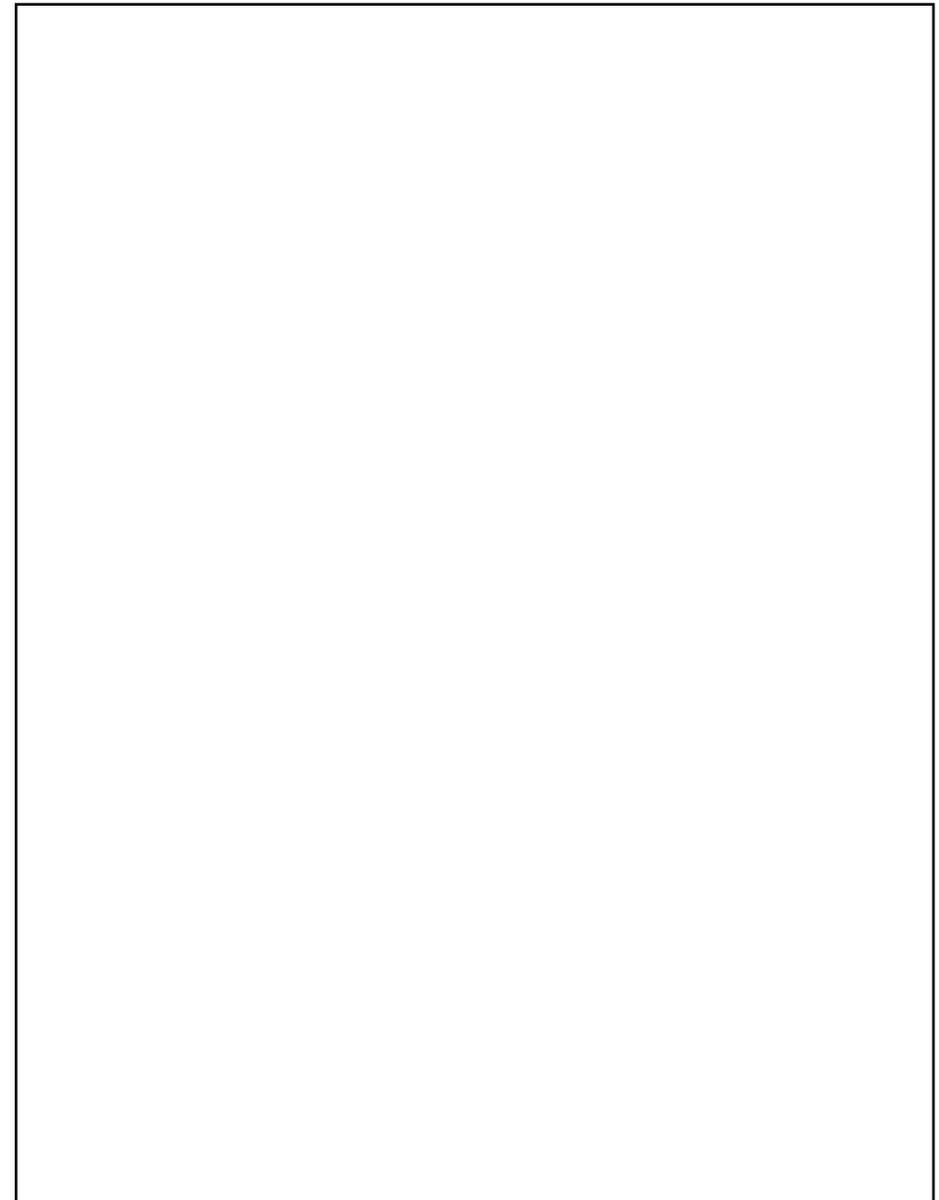
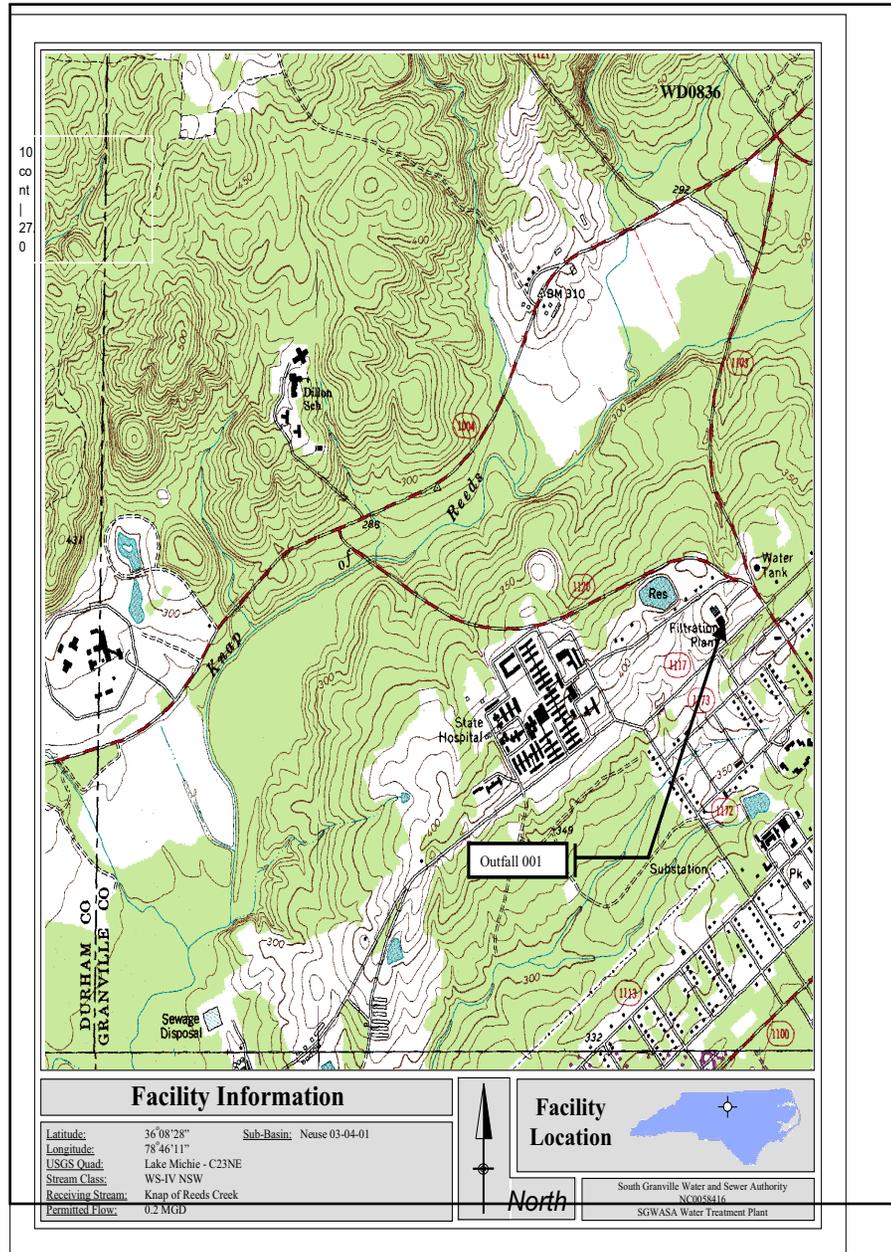
Should the permittee fail to monitor during a month in which toxicity monitoring is required, then monthly monitoring will begin immediately. Upon submission of a valid test, this monthly test requirement will revert to quarterly in the months specified above.

Should any test data from this monitoring requirement or tests performed by the North Carolina Division of Water Quality indicate potential impacts to the receiving stream, this permit may be re-opened and modified to include alternate monitoring requirements or limits.

If the Permittee monitors any pollutant more frequently than required by this permit, the results of such monitoring shall be included in the calculation & reporting of the data submitted on the DMR & all AT Forms submitted.

NOTE: Failure to achieve test conditions as specified in the cited document, such as minimum control organism survival, minimum control organism reproduction, and appropriate environmental controls, shall constitute an invalid test and will require immediate follow-up testing to be completed no later than the last day of the month following the month of the initial monitoring.

Winters, Judy



Wissman, Donald

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P. 1
FD0041

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

August 23, 2008

Dear Mr. Johnson,

1|24.4

I am pleased to write this letter of support for the location of the Bio and Agro-Defense Facility in Manhattan. I write this letter after considerable thought regarding the need for such a facility and the pros and cons of the facility's location here in Manhattan.

By way of background, I am a retired senior economist with 35 years of service with DPR Inc., an international research and consulting firm. I also served as Chairman and CEO of the 170 member firm during the last ten years of my tenure. Our work covered five continents and over 60 different countries including many projects completed for clients in the Washington DC area. The work was normally related to agriculture, the marketing of food products and the environment. Our clients included private firms, governmental departments and agencies at the local, state and national level and foreign governments. We also completed a number of policy studies for the U. S. Department of Agriculture, the Environmental Protection Agency and other agencies. As you can well imagine, we cooperated with variety of professionals and support staff in other consulting groups, firms and governmental agencies. We also worked with university professors, other research and consulting scientists and specialists from within our own Manhattan community

I know you have received a great deal of information regarding virtues of Manhattan and the research and professional community that exists here, thus, I will not attempt to duplicate that. I also know that you will most likely review a great amount of additional information in order to arrive at the final critical judgment, so I will keep my letter brief. I simply have two points I would like to make

Comment No: 1 Issue Code: 24.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative. The decision on whether or not the NBAF is built, and, if so, where will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

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FD0041

2| 5.0

First the United States must keep up to date in the field of bio sciences either by extensively remodeling existing facilities at Plum Island or by constructing new facilities at a selected site. Too much of our nation's infrastructure has fallen into ill repair. Given the increase in international travel, the present and projected increase in trade of goods and materials between nations, and the casual or indifferent attitude of many travelers toward rules and regulations, it is imperative the we are prepared

1 cont.| 24.4

Second, and I speak from personal experience, you will not find a more favorable, productive workforce location than in Manhattan. There is a long history of positive cooperation between the business community, Kansas State University and Ft Riley at all levels. This is not just an image for political or cosmetic purposes but it is an integral part of our history. There is a realization in the community that genuine cooperation makes us all stronger and more effective regardless of position. It has also been my experience that the work ethic here is without comparison. Professionals as well as support staff have very high performance standards, are very ethical in their personal and professional behavior and are very productive in their endeavors. We simply get the job done. This builds a very strong community as witnessed by the rapid community-wide response following the tornado disaster that hit here earlier this summer.

Manhattan is a great community and I know the US department of Homeland Security will not be disappointed if they locate here.

Sincerely

Donald J. Wissman, PhD.
Chairman, DPRA
Retired

Comment No: 2

Issue Code: 5.0

DHS notes the commentor's support for the field of biosciences.