

Wolf, Shelly

Page 1 of 1

WD0437

From: s wolf [REDACTED]  
 Sent: Wednesday, August 20, 2008 10:02 PM  
 To: NBAFProgramManager  
 Subject: I oppose a NBAF Lab

- 1 | 25.4 | I am writing to express my opposition to having a NBAF level 4 lab in Manhattan, Kansas. I feel  
 2 | 5.4 | that the lab should be placed somewhere far away from humans, domestic animals and beef  
 cattle.... Not right in the middle of farming communities!
- I do not believe it should be in Manhattan, KS due to the following reasons:
- 3 | 21.4 | • It has not been proven that the lab can withstand a F4 or F5 tornado. We just had a F4  
 tornado come through town on June 11, 2008. Kansas is known to have a lot of turbulent  
 weather from high winds and tornados. Putting the lab in the middle of tornado country  
 is putting our family and friends in harms way. It's already a little un-nerving to know  
 that we have a nuclear reactor here.
- 4 | 15.4 | • We are in the heart of livestock country. If a disease such as foot and mouth were to  
 escape it would be devastating to the hundreds upon thousands of citizens who would  
 loose their livelihoods.
- 5 | 9.4 & 12.4 | • I feel that the lab could contaminate the air and/or water caused by possible leaks.  
 3 | 21.4 | • Having a level 4 lab here only brings about people who have a terroristic agenda, thus  
 cont. another reason to isolate the lab farther away from human population.
- 2 cont. | 5.4 | Plum Island should be #1 on the list to having the NBAF lab, not Manhattan, Kansas.

Thank you,

Shelly Wolf  
[REDACTED] KSFREE Animations for your email - by IncrediMail! [Click Here!](#)

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 5.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative due to its proximity to humans, domestic animals, and cattle in favor of the Plum Island Site. The NBAF would be designed and constructed using modern biocontainment technologies, and operated by trained staff and security personnel to ensure the maximum level of worker and public safety and least risk to the environment in accordance with all applicable federal, state, and local laws and regulations.

Comment No: 3 Issue Code: 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.

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.

Comment No: 4 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: 5                      Issue Code: 9.4

DHS notes the commentor's air quality concerns. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the Manhattan Campus Site are discussed in Section 3.4.4. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used as necessary during the permitting process. The final design would ensure that the NBAF does not significantly affect the region's ability to meet air quality standards.

Comment No: 5                      Issue Code: 12.4

DHS notes the commentor's water quality concerns. Section 3.7.1 of the NBAF EIS describes the methodology used in assessing each alternative sites' water resources. Section 3.7.4 specifically addresses the Manhattan Campus Site's water resources and the affects and potential consequences from construction and operation of the proposed NBAF.

Woodlief, Jr., Al

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FD0098

ID=2524928756  
F02/05

1-18-08 09:08

**DEPARTMENT OF ADMINISTRATION  
INTERGOVERNMENTAL REVIEW**

STATE NUMBER: 08-E-0000-0380 001  
DATE RECEIVED: 06/26/2008  
AGENCY RESPONSE: 08/20/2008  
REVIEW CLOSED: 08/25/2008

CLEARINGHOUSE COORD REGION E  
KERR TAR REGIONAL COG  
P.O. BOX 709  
HENDERSON NC

REVIEW DISTRIBUTION  
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CO&PS - DEM, NFIP  
DENR LEGISLATIVE AFFAIRS  
DEPT OF CUL RESOURCES  
DEPT OF TRANSPORTATION  
KERR TAR REGIONAL COG

PROJECT INFORMATION  
APPLICANT: U.S. Department of Homeland Security  
TYPE: National Environmental Policy Act  
ERD: Draft Environmental Impact Statement  
DESC: Alternative locations in 6 different states including Umstead Research Farm at  
Sutner for the construction/operation of the National Bio & Agro Defense Facility  
in Granville County. Visit <http://www.dhs.gov/nbaf> for document  
CROSS-REFERENCE NUMBER: 08-E-0000-0553

The attached project has been submitted to the N. C. State Clearinghouse for  
intergovernmental review. Please review and submit your response by the above  
indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.  
If additional review time is needed, please contact this office at (919)877-2425.

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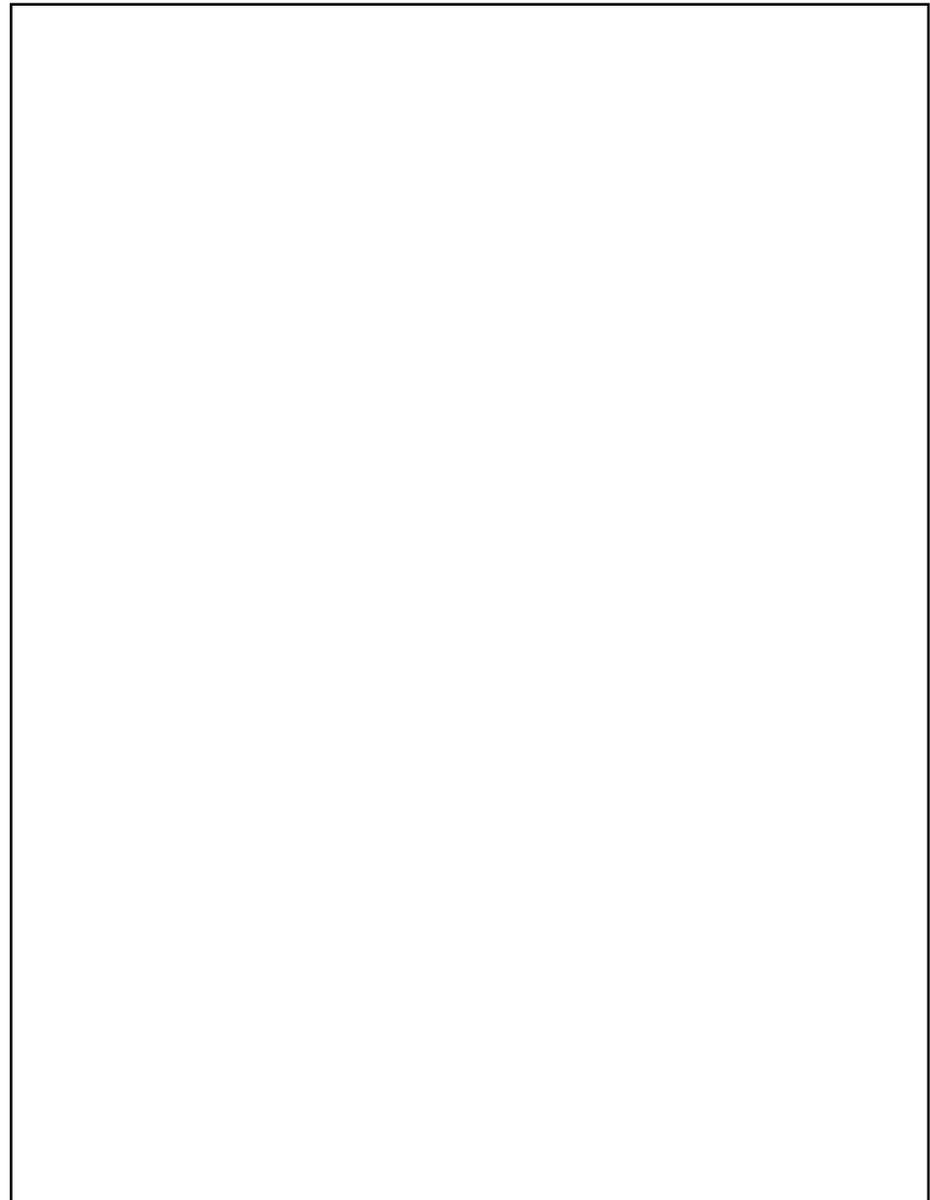
AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED:

NO COMMENT

COMMENTS ATTACHED

SIGNED BY: \_\_\_\_\_

DATE: \_\_\_\_\_



Woodlief, Jr., Al

Page 2 of 4

FD0098

ID=2924929756    CITY OF OXFORD    P03/05  
RECEIVED JUL 20 2008    FILE    COPIES TO

JUL 01 2008  
RE-ROUTE TO

18-08 09109  
**Kerr-Tar**  
Regional Council  
Of Governments

Timothy M. Boytes  
Executive Director

**N.C. INTERGOVERNMENTAL REVIEW PROCESS**

**REVIEW AND COMMENT FORM**

Member Governments

COUNTIES  
Franklin  
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Winston-Salem  
Yorba Linda

This office received the attached information about a proposal, which could affect your jurisdiction. If you need more information, contact the applicant directly.

If you wish to comment on this proposed action, complete this form with comments and return to this office by: 8-18-08

For additional time past the due date, please contact our office as soon as possible.

If no comment is received by the above date it will be assumed you have no comments regarding this proposal.

STATE APPLICATION IDENTIFIER # 08-E-0000-0390

Responder's Name/Title: Al Woodlief, Jr.  
Mayor

Representing: City of Oxford  
(Local Government)

Address: PO Box 1307 Oxford, NC 27565

Telephone: (919) 603-1100 Date: 7/24/08

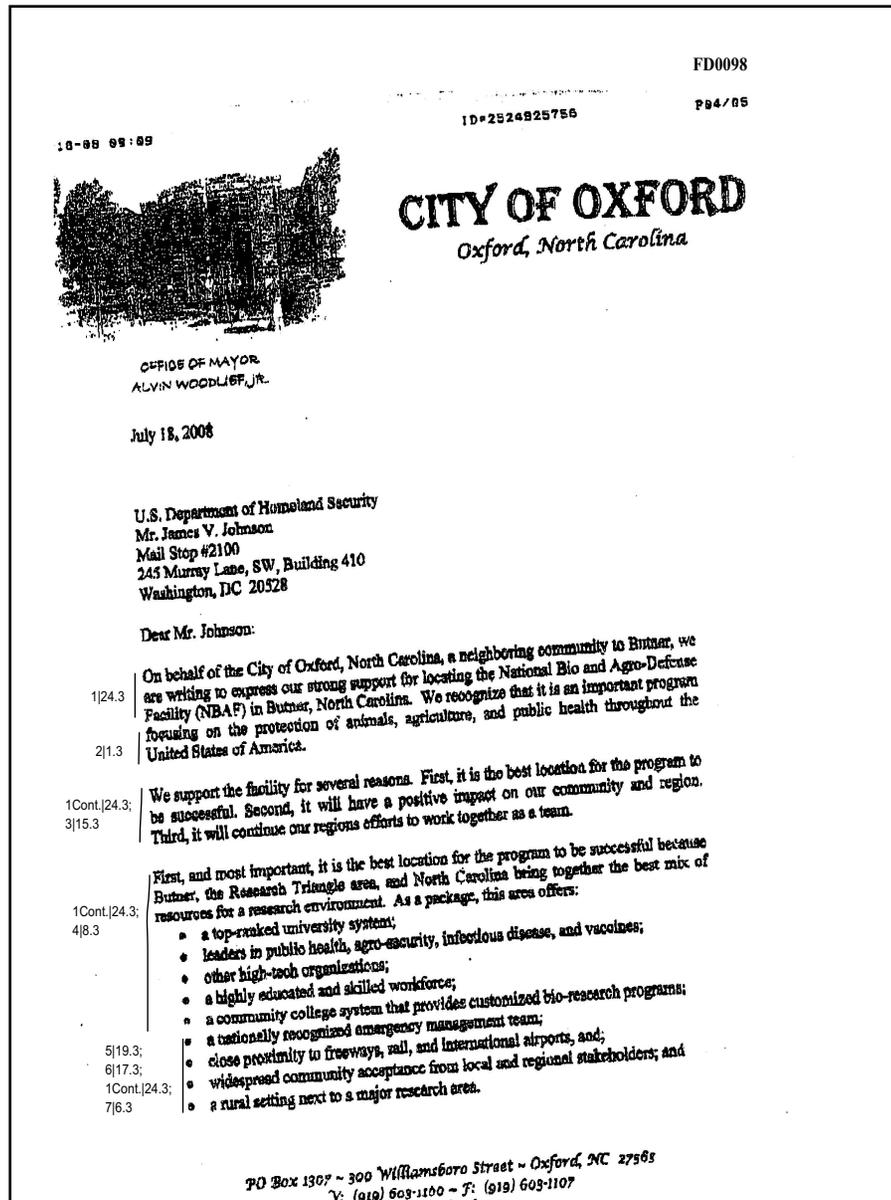
Comments: (attach additional page(s) if necessary):

**Planning and Development for a Better Region K**  
P.O. Box 700 • 1724 Graham Avenue • Henderson, NC 27536 • Phone (252) 436-2040 • Toll Free (866) 300-6223 • Fax (252) 436-2068



Woodlief, Jr., Al

Page 3 of 4



Comment No: 1 Issue Code: 24.3  
DHS notes the Mayor's support for the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 1.0  
DHS notes the Mayor's statement.

Comment No: 3 Issue Code: 15.3  
DHS notes the Mayor's support for the Umstead Research Farm Site Alternative. The socioeconomic effects of the NBAF at the Umstead Research Farm Site on the four-county region are included in Section 3.10.7 of the NBAF EIS.

Comment No: 4 Issue Code: 8.3  
DHS notes the Mayor's statement.

Comment No: 5 Issue Code: 19.3  
DHS notes information provided by the Mayor.

Comment No: 6 Issue Code: 17.3  
DHS notes the Mayor's statement.

Comment No: 7 Issue Code: 6.3  
DHS notes the Mayor's statement.

Woodlief, Jr., Al

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FD0098

P95/05

ID-2524925756

-18-88 89118

4Cont.[8.3;  
3Cont.[15.3

Second, while this region does have the resources necessary to facilitate the success of the NBAF, the NBAF will help the growth in the rural area surrounding the Research Triangle. Many rural communities have a good labor force but lack jobs. The creation of between 250-350 research, technical, and operations positions will definitely benefit Butler and surrounding communities like Oxford. While many of these jobs will be filled by residents of Raleigh and Durham, just a few miles away from Butler, people in Granville County will also have new opportunities. This is especially true with the outstanding training facilities at the Vance-Granville Community College.

4Cont.[8.3;  
3Cont.[15.3

Third, the facility will continue to strengthen public and private sector entities through the regional partnerships such as the Council of Governments. With most rural communities struggling to overcome declines in their traditional industries and crumbling infrastructure, the facility will provide an opportunity for the surrounding regions to strengthen its regional economic development strategy.

1Cont.[24.3;  
4Cont.[8.3

In summary, we strongly support the full implementation of the National Bio and Agro-Defense Facility in Butler, North Carolina. Butler is the ideal location for the NBAF, a program focusing on the protection of animals, agriculture, and public health throughout the United States. The resources that are needed to support this project are in place. Butler is in a rural area surrounded by agriculture but adjacent to an internationally recognized research center. While rural, Granville County has resources, like the Vance-Granville Community College, that will facilitate the move and complement the already robust research facilities in the Research Triangle area.

Thank you for your consideration.

Sincerely,

*Al Woodlief, Jr.*  
Al Woodlief, Jr.  
Mayor

Woodrick, Jim

Page 1 of 1

MD0014

MISSISSIPPI DEPARTMENT of ARCHIVES AND HISTORY

**MDAH** 

HISTORIC PRESERVATION  
Ken Pool, director • Jim Woodrick, acting director  
PO Box 571, Jackson, MS 39205-0571  
601-576-6940 • Fax 601-576-6955  
mdah.state.ms.us

July 30, 2008

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

RE: National Bio and Agro-Defense Facility Draft Environmental Impact Statement  
(NBAF DEIS), Alternate Site at Flora Industrial Park in Flora, MDAH Project Log  
#06-237-08, Madison County

Dear Mr. Johnson:

We have reviewed your request for a cultural resources assessment, received on June 30, 2008, for the above referenced project in accordance with our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After reviewing the information provided, it is our determination that the proposed National Bio and Agro-Defense Facility, if located at the alternate site in Flora, Mississippi, will not likely affect any known cultural resources. Therefore, we would have no objection with the proposed undertaking.

We appreciate the opportunity to comment. If we can be of further assistance, please do not hesitate to contact me at (601) 576-6940.

Sincerely,

  
Jim Woodrick  
Review and Compliance Officer

FOR: H.T. Holmes  
State Historic Preservation Officer

c: Clearinghouse for Federal Programs

Comment No: 1 Issue Code: 14.5

DHS notes the commentor's statement concurring with the Flora Industrial Park cultural resource assessment and lack of objection.

11 14.5

Woolfolk, Shap and Dee

Page 1 of 1

PD0163

August 21, 2008

1|25.4 | This is Shap and Dee Woolfolk of [REDACTED] Kansas and we want you to know that we don't want the NBAF to be built in Kansas.

Thank you.

Comment No: 1 Issue Code: 25.4

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

Work, David

Page 1 of 2

08/25/2008 08:03

FD0055

=== COVER PAGE ===

TO: \_\_\_\_\_

FAX: 18665086223

FROM: PORT OF ROSEDALE

FAX: 6627596213

TEL: 6627596212

COMMENT:

Work, David

Page 2 of 2

08/25/2008 08:03 6627596213 PORT OF ROSEDALE PAGE 01  
FD0055

**THE CITY OF CLEVELAND**  
CLEVELAND, MISSISSIPPI 38732



DAVID WORK, SR.  
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CITY CLERK

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JOHN W. VALENTINE  
CITY ATTORNEY

1) 24.5 BRETT MOURMAN  
DIRECTOR OF  
PUBLIC WORKS

STEPHEN GLORIOSO  
DIRECTOR OF  
PARKS & RECREATION

GREG KORB  
CITY ENGINEER

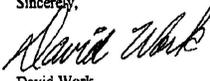
August 25, 2008

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

FAX: 1866-508-6223

Re: National Bio and Agro-Defense Facility location in Mississippi

Although I do not live in Flora, I think Flora and Mississippi would be the ideal location for the National Bio and Agro-Defense Facility. This area as well as the State of Mississippi has so much to offer a facility of this nature that any other location would be a huge mistake for many years to come.

Sincerely,  
  
David Work  
Mayor  
City of Cleveland, Mississippi

100 NORTH STREET • P.O. BOX 1458 • TEL. 662-844-1471 • FAX 662-845-0029

Comment No: 1 Issue Code: 24.5

DHS notes the Mayor'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.

Worl, Lath

Page 1 of 1

WD0409

**From:** lath worl [REDACTED]  
**Sent:** Wednesday, August 20, 2008 1:14 PM  
**To:** NBAFProgramManager  
**Subject:** "bio defense" lab in Manhattan KS

1|25.4 I am a concerned citizen of the Kansas [REDACTED] area. I am writing to express my opposition to  
 2|21.4 the proposed construction and implementation of the NBAF in Manhattan KS at KSU (my alma  
 mater). The plain and simple fact is that such a facility would pose far to much danger to the  
 citizens of this area. There is simply too much possibility of problems arising associated with  
 pathogens "contained" within such a place. A facility such as this would be best located  
 3|5.0; OUTSIDE THE CONTINENTAL U.S. Furthermore, I see absolutely no reason to scatter these  
 2 cont.| types of facilities all over the United States. In doing so, you people are quite literally inviting  
 21.4 catastrophe. Use your heads.

1 cont.| Simply put, we dont want this thing in Manhattan or anywhere near us or any other U.S. citizen.  
 25.4; The possible danger associated with such a facility is simply UN-ACCEPTABLE! There should  
 2 cont.| ONE facility for this purpose and it should be located on an atoll somewhere in the Pacific.  
 21.4;  
 3 cont.| NO BIO DEFENSE LAB IN KANSAS!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!  
 5.0

Comment No: 1                      Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus 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: 21.4

DHS acknowledges commentor's statement that safety at the NBAF is not guaranteed. DHS also notes that the risk of an accidental release of a pathogen from the NBAF is extremely low. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. 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. For example, as described in Section 2.2.2.1, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics.

Comment No: 3                      Issue Code: 5.0

DHS notes the commentor's suggestion. However, as described in Chapter 1 of the NBAF EIS, the purpose and need for the proposed action encompasses the need for integrated, BSL-4 laboratories in the United States necessary to conduct research and develop countermeasures for zoonotic and foreign animal diseases.

Worley, Ron

Page 1 of 1

WD0603

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**From:** ronworley@aol.com  
**Sent:** Saturday, August 23, 2008 5:28 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF site selection

1|24.4 Please allow me to endorse and encourage the selection of Manhattan, Kansas, as the new site for the NBAF location. Manhattan, Kansas, is the best possible site for NBAF for a great number of reasons, including ready access to nearby private animal-health industry facilities, access to the food science facilities of Kansas State University and the nearly total public support of the local area citizens and of the entire State of Kansas. Thank you for your kind attention. Ron Worley, Kansas State Representative, 30th District, Lenexa, Kansas. [worley@house.state.ks.us](mailto:worley@house.state.ks.us)

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

Comment No: 1      Issue Code: 24.4

DHS notes the State Representative'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.

**Worth, Joan**

**Page 1 of 1**

**PD0028**

July 27, 2008

Hello,

1|25.3 | My name is Joan Worth, and I am calling to very extremely oppose the implementation of the lab...the bio lab.

I do not want it put in Butner, North Carolina. Do not want it in Butner, North Carolina, please.

Thank you.

Comment No: 1

Issue Code: 25.3

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

**Worthington, Roy**

**Page 1 of 1**

WD0276

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**From:** Roy H. Worthington [REDACTED]  
**Sent:** Friday, August 15, 2008 9:07 AM  
**To:** NBAFProgramManager  
**Subject:** Support for Manhattan, KS location

1|24.4 | My name is Roy H. Worthington. I have been a resident of [REDACTED] KS since 1974, am an attorney and the owner of a small business in Manhattan. I fully support the location of the National Bio and Agro-Defense Facility at Kansas State University. The expertise of the university is the perfect support vehicle for the facility and the quality of life in Manhattan is second to none.

*Roy H. Worthington*

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

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.

Wright, Judith Ann

Page 1 of 14

WD0869

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**From:** [REDACTED]  
**Sent:** Monday, August 25, 2008 10:47 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF DEIS COMMENTS  
**Attachments:** deiscomments.doc

Dear Mr. Johnson:  
Please include the attached comments in the record for the NBAF DEIS.  
Thank you.

Judith Ann Wright

Wright, Judith Ann

Page 2 of 14

WD0869

AUGUST 25, 2009

To Jamie Johnson, Project Manager:

COMMENTS ON NBAF DEIS TO BE INCLUDED IN THE RECORD: all documents linked from this one to be part of the record as well, by reference.

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Dear Mr. Johnson:

The NBAF DEIS is long on mind-boggling modeling and incomprehensible charts, and short on analysis of the potential site for short term, long term and cumulative environmental impacts. As such it is deficient and needs to have a supplemental EIS to address all the issues that were insufficiently examined.

LACK OF CONSULTATION WITH OCONEE COUNTY/WATKINSVILLE PLANNING OFFICIALS

1|6.2

Environmental impacts for projects the size and scope of NBAF cannot be expected to stop at the county line. In this case, the NBAF project site adjoins Oconee County at the Oconee River. Yet there has been no apparent coordination or consulting during the DEIS process with officials in adjoining Oconee County. The following is a link to a brochure with contact information for the Strategic Planning Department.

<http://www.oconeecounty.com/Government/StrategicPlanning/Strategic%20PDFs/SLRP-Brochure.pdf>

Oconee County has recently released its updated Joint Comprehensive Plan 2030, which is a roadmap for development of the County for the next twenty two years. The Plan is online as several PDF documents at the following sites:

<http://www.oconeecounty.com/Government/StrategicPlanning/Strategic%20PDFs/JCPCommunityAgendaFinal-3-2008.pdf> (Community Agenda, 128 pages)

<http://www.oconeecounty.com/Government/StrategicPlanning/Strategic%20PDFs/FutureDevelopmentMap2030.pdf> (Oconee County Future Development Map 2030, one page)

<http://www.oconeecounty.com/Government/StrategicPlanning/Strategic%20PDFs/CommunityAssessmentVol1Final.pdf> (Community Assessment Volume 1 Issues and Opportunities, 69 pages)

Comment No: 1

Issue Code: 6.2

DHS notes the information submitted by the commentor. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Chapter 3, Section 3.2.3. DHS and USDA would ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and policies. Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 23 public meetings have been held in the vicinity of NBAF site alternatives and in Washington D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered DHS has also provided fact sheets, reports, exhibits, and a Web page (<http://www.dhs.gov/nbaf>). Additionally, various means of communication (mail, toll-free telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance. The University of Georgia would arrange for an alternative for any temporary use at the South Milledge Avenue Site if construction of the NBAF at the site is selected.

Wright, Judith Ann

Page 3 of 14

WD0869

1 cont. | 6.2

<http://www.oconeecounty.com/Government/StrategicPlanning/Strategic%20PDFs/CommunityAssessmentVol2Final.pdf> (Community Assessment Volume 2 , Technical Analysis, 165 pages)

Please add these documents to the official record, as apparently none of the impacts of NBAF were included in the documents' planning process, nor were the content and intent of the Oconee County planning decisions , environmental goals and protections considered in the siting of the adjoining NBAF facility

2 | 3.0

Here is a summary of the newest Oconee County code changes; the entire code should be examined for problematic areas in the DEIS regarding environmental impacts upon the adjoining Oconee County lands and property owners.

<http://www.oconeecounty.com/UDC-PDFs/UDC-Files6-16-06/Key%20Changes%20Summary%206-15.pdf> Key Improvements and Changes in the United Development Code Ocone Co GA 11 pages

Some other issues are listed below.

OCONEE COUNTY IMPACTS

Traffic.

Impacts at the site.

3 | 17.2

The current Y-shaped intersection at the site is already a bad bottleneck and the scene of daily back-ups at rush hour. There is no detailed traffic study in the DEIS to determine what the impacts of reconstruction of the intersection (if planned) and a turning lane into NBAF will be. Car counts should be provided for typical weekday and weekend day trips, as well as a detailed schedule of the duration of road construction phases and maps of any necessary detours. Also funding of this project should be clarified—the state DOT claims to currently be unable to commit to various projects for lack of funds.

Impacts in Watkinville.

Simonton Bridge Rd. is the continuation of Whitehall Rd. (which intersects with S. Milledge at the NBAF site) and ends three to four miles from the site in downtown Watkinville. There is no analysis whatsoever of the traffic impacts on Watkinville from the site. Within the past two years, the amount of traffic on Simonton Bridge Rd. has contributed to the need for an additional traffic light in downtown Watkinville. This new light has not managed to lower the level of gridlock at the intersection.

Comment No: 2 Issue Code: 3.0

DHS notes commentor's suggestion. Should a decision be made to build the NBAF, it would meet all federal, state and local regulations.

Comment No: 3 Issue Code: 17.2

DHS notes the commentor's concern about the traffic congestion in the area of the South Milledge Avenue site and the future impact of the NBAF operation on the area's transportation infrastructure. A discussion of the planned improvements to the area's primary transportation corridors of South Milledge Avenue and Whitehall Road, as based on a traffic analysis from the Georgia Department of Transportation and Public Works, to alleviate current and future traffic congestion resulting from the NBAF operation at the South Milledge Avenue Site Alternative is located in Section 3.11.3.3.1 of the NBAF EIS. All planned improvements are per the recommendations of the Georgia Department of Transportation and the Public Works Department as of 2007.

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ARCHAEOLOGY AND POSSIBLE PREHISTORIC SITES IGNORED

As the Oconee County document above relates,

4| 14.2

"Potential but undiscovered sites include Native American burial grounds and prehistoric habitation sites, the latter of which tend to be located along a stream or river. Such sites, when found, are protected by State and Federal laws."

The DHS must commission an archaeologist to dig in sample sites along the Oconee River, the former boundary of the US territories and the home of Creek/Cherokee tribes. Any found artifacts must be recorded and/or excavated and the site avoided in environmental impacts from NBAF. This procedure is done in the simplest subdivision work nationwide and the fact that the DHS has not undertaken such efforts is inexcusable.

NBAF OUT OF CHARACTER WITH ADJOINING PROPERTIES IN OCONEE COUNTY1 cont. | 6.2  
5| 7.2

The siting of NBAF on the Oconee River is clearly out of step with the planning documents recently completed by Oconee County and referenced above. The OCONEE COUNTY GEORGIA FUTURE DEVELOPMENT MAP 2030 clearly shows the neighborhoods and natural areas on the Oconee side of the river as being suitable for "COUNTRY ESTATES" with the TECHNOLOGY GATEWAY confined to the north section of the county along highways 316 and 78. The DEIS apparently did not take this into consideration in determining if the site of NBAF in Athens was in keeping with the rural nature of the area. This site is ridiculously out of context with the neighboring properties, which include a state botanical garden, a forest, the equestrian complex, and the 'country estates' area across the river.

THE EIS should follow the 1998 Oconee River Basin Management Plan prepared by the DNR. The chart of endangered and threatened animals and plants is on page 92 of the Community Assessment document Volume 2, above. This is important to Oconee County!!

CLIMATE AND SEVERE WEATHER DEIS DEFICIENCIES AND UNEQUAL TREATMENT6| 21.2  
7| 23.0

Incredibly, the DEIS plays favorites with protection from severe winds during a tornado in its stated building plans for Plum Island versus the other sites. The level of protection planned is inadequate for the Athens site (and possibly Plum Island) based on past history and current weather modeling.

Pg. 3-64 DEIS

NBAF S. Milledge Ave. Site:

Comment No: 4Issue Code: 14.2

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

Comment No: 5Issue Code: 7.2

DHS notes the commentor's concern regarding development of the South Milledge Avenue Site, which is described in Section 3.2.3 of the NBAF EIS. A change in land use would occur; however, current zoning regulations allow for this type of development. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Section 3.2.3. DHS and USDA ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and policies. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area. The construction and operation of the NBAF would not affect Oconee County's ability to steer development according to its Comprehensive Plan.

Comment No: 6Issue Code: 21.2

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.

DHS notes the commentor's concern regarding a plane crashing into the NBAF. The risk rank for loss of containment from an aviation incursion (airplane crash) is low, and mitigative measures would

reduce risk of an accidental release.

DHS notes the commenter's concern regarding a malicious and criminal act perpetrated by an NBAF employee. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including internal and external events such as an "insider" criminal act and 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.

Comment No: 7                      Issue Code: 23.0

DHS notes the commenter's opposition to the five mainland site alternatives. 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. No-fly zones would be considered along with other security measures for the proposed NBAF regardless of the site selected.

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"The exterior of the building would be designed to withstand wind pressures which are the equivalent of a 119-mph, which has a calculated and accepted probability of occurring to any specific property only once every 50 years."

Pg. 3-77 DEIS

Plum Island Site:

"The exterior of the building would be designed to withstand wind pressures which are the equivalent of a 156 mph wind, which has a calculated and accepted probability of occurring to any specific property only once every 50 years."

So, even though the two sites apparently have the SAME probability of winds between 119-mph and 156 mph, only the PLUM ISLAND site would be built to withstand the higher winds. This is an unacceptable and avoidable potential environmental impact for the ATHENS site, which is one hour away from the scene of a 1936 tornado measuring F-5 on the Fujita Scale, 261 to 318 mph, and which predictably leaves "steel reinforced concrete structures badly damaged."

Regardless of which NBAF site is chosen, deliberately designing the structure to withstand winds less than 318 mph in spite of the potential for F-5 tornadoes is insufficient and negligent planning. And planning to build one site (Plum Island) with more strength than the others cannot be justified. All should be planned for the maximum strength, and if withstanding winds of 318 mph is not feasible, the NBAF should not be built.

Here is an explanation of the effects of an F-5 tornado—one that landed an HOUR away from Athens in 1936.

<http://www.tomadoproject.com/fscale/fscale.htm>

"F5 Incredible tornado 261-318 mph Strong frame houses lifted off foundations and carried considerable distances to disintegrate; automobile sized missiles fly through the air in excess of 100 meters; trees debarked; steel reinforced concrete structures badly damaged."

Please see the material provided by UGA Galileo library project below for documentation of the above facts:

<http://dlgmaint.galib.uga.edu/tornado/about/history.php>

## Introduction to the Gainesville Tornado Disaster of 1936

7 cont.| 23.0

6 cont.| 21.2

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On the ill-fated morning of April 6, 1936, citizens of [Gainesville](#), Georgia, a bustling commercial and industrial town nestled in the foothills of the Blue Ridge Mountains, were dealt an agonizing blow when a series of deadly tornadoes ripped through the heart of the city damaging infrastructure and destroying hundreds of its businesses and residences. In the wake of the great disaster more than two hundred men, women, and children were killed and an estimated 1,600 citizens were injured. Today, the Gainesville tornado disaster of 1936 stands as one of the worst weather-related disasters in the history of the state and is widely regarded as the fifth deadliest tornado episode in recorded United States history. The following sketch of the 1936 Gainesville tornado disaster provides links to other related digitized collections accessible through GALILEO including *Hall County Historical Photograph Collection*, *New Georgia Encyclopedia* and *Vanishing Georgia*.

6 cont.| 21.2

[The Tupelo-Gainesville Outbreak](#) | [A City in Ruin](#) | [Georgians Respond](#) | [The Government Responds](#) | [A Return to Normalcy](#)

### The Tupelo-Gainesville Outbreak

The tornadoes that tore through Gainesville were part of a larger storm system known as the Tupelo-Gainesville Outbreak which produced approximately seventeen tornadoes that touched down in Arkansas, Mississippi, Alabama, Tennessee, Georgia, and South Carolina. On April 5, the evening before the Gainesville disaster, citizens of Tupelo, Mississippi were shaken from their slumber when an estimated eight tornadoes, registering as F-5 on the [Fujita scale](#) of tornado intensity, swept through the northern residential sections of the city killing 216 and injuring approximately 700. The following morning shortly before 9:00 A.M. eyewitness reports recalled seeing at least two tornadoes strike the southwest section of Gainesville, then move northeast through the commercial district and on to the residential neighborhoods near North Green Street. From the northeastern residential area, the tornado traveled east two miles towards the textile center of New Holland where it destroyed nearly one hundred homes as well as the Pacolet Manufacturing Company [[hal064](#),[hal065](#),[hal116](#)].

### IMPACTS TO THE ADJOINING UGA EQUESTRIAN FACILITY AND ANIMAL INSTRUCTIONAL ARENA.

8|6.2

The area adjoining the NBAF site is described only as currently housing grazing horses. This is the highest and best use of the property, as it complements the adjoining equestrian facility that was built only a few years ago and has a multitude of uses. The horses need the land and ponds for grazing. UGA should not have offered a site that is

Comment No: 8

Issue Code: 6.2

DHS notes the commentor's concern. Section 3.2.3 of the NBAF EIS identifies the University of Georgia Livestock Instructional Area is located near the South Milledge Avenue Site. DHS has no plans to close any facility in the region due to the siting of the proposed NBAF at the South Milledge Avenue Site. The risk of an accidental release of a pathogen is low, but DHS acknowledges that the possible economic effect would be significant for all sites. The potential effects to livestock-related industries is discussed in Appendix D and Section 3.10.9.

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right on top of this equine facility, which could easily carry escaped pathogens far and wide. Despite being questioned many times about the fate of the Equestrian facility, the DHS has not examined the problem in the DEIS. It should interview UGA officials for a comprehensive report on the range and scope of the activities and the people and animals affected at this complex, and the potential long and short term impacts upon all of them if Athens is chosen as the NBAF site.

1 cont.,| 6.2

Never mind the fact that it is an island. The Plum Island site is 800 acres DEVOID OF ANIMALS surrounding the buildings. Why would UGA offer a site surrounded on all sides by horses, and wildlife? Will these be moved/depopulated to make the site as pristine as Plum Island? If not, then will Athens be comparable in safety? This issue is not examined in the DEIS!

From GEORGIADOGS.COM:

"Members of the Georgia equestrian program enjoy one of the finest facilities of its kind in the United States. Completed in 2001 among the rolling hills on South Milledge Avenue, the Animal Science Instructional Arena provides the hub for this complex. UGA has also added a covered, open-air competition area, an outdoor jumping ring and stables that can accommodate up to 18 horses.

- The home for Georgia Equestrian is a special facility. It has ties to UGA tradition and design, as well as a new look toward the future. The facility embraces the traditional charm of UGA's old Red Barn (circa 1934) combined with classic Georgian architecture. The facility also sports the nationally recognized Georgia "G" as immediate proof of its athletic heritage. The red brick structure is distinctive in that it has been designed to specifically meet the current and future needs of both UGA Equestrian athletes, as well as the team's equine partners.
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Below is the University of Georgia's schedule for varsity equestrian events . They take place in the Livestock Instructional Arena, adjoining and steps away from the NBAF site. The UGA team is the defending NCAA champion, with more than 60 riders, with horses housed on-site.

Will these events and many others at the arena continue, just outside the fence of the NBAF? This issue is apparently addressed NOWHERE in the DEIS for the Athens NBAF site.

- 
- Meanwhile, the equestrian facility is used on a regular basis by teams from all over the country:
- 
- **UNIVERSITY OF GEORGIA**  
**2008-09 EQUESTRIAN SCHEDULE**
- **Sept. 20 vs. Kansas State**  
**Sept. 21 vs. Fresno State**  
Oct. 3 at Delaware State  
Oct. 18 at Auburn  
**Nov. 7 vs. Southern Methodist**  
**Nov. 8 vs. South Carolina**  
Nov. 21 at Baylor  
Nov. 22 at TCU  
Nov. 23 at SMU  
Feb. 7 @Fresno State, vs. New Mexico State (@Fresno)  
Feb. 21 at South Carolina  
**Feb. 28 vs. Auburn**  
**Mar. 27 vs. UT-Martin**  
**Apr. 3-4 Southern EQ Championships (@Athens)**  
Apr. 16-18 Varsity EQ National Championships (@Waco, Texas)
- Home Meets in Bold

" **Apparently, the Equestrian complex includes a LIVE-IN caretaker. (see ad below from 2006). Arena caretaker wanted.** Successful applicant will reside in and care for the University of Georgia's Livestock Instructional Arena. Tenant is expected to keep grounds mowed and borders trimmed, help with events, keep facility clean, and complete a nightly grounds check. Working on some weekends and holidays is expected. Tenant must keep apartment clean at all times and expect to have inspections once a month.

Applicant must be a student of the UGA College of Agricultural and Environmental Sciences. Must be able to operate heavy machinery, lift at least 100 pounds, and have some farm experience. Also needs to have a willingness to complete tasks with efficiency and initiative. Needs to have a flexible schedule.

Salary: Hourly ~ \$6.00/hour. Must complete 10 hours per week in exchange for apartment.

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Contact: Nick Carden at [REDACTED]

1 cont. | 6.2

The DEIS did not analyze ANY facts regarding the Animal Instructional Arena and its many activities, including Equestrian events, rodeos, auctions, 4-H events, dairy science and club riding (see stories above.) These events draw thousands of visitors from across the country, as well as livestock and equine from points well outside Athens. Will this facility, with its teaching classrooms and home to the Equestrian team and its horses be closed? Will it continue without "impacts" from the NBAF facility, literally steps away? Will the horses serve as "sentinel" animals in case of an escape of pathogens, and therefore be allowed to remain? What will be the options for those who work, teach, ride, or otherwise use the the Instructional Livestock Arena? NONE of these questions are asked or answered in the DEIS, despite being raised in the scoping process in writing.

**UGA CLUB SPORTS EXPANSION FIELDS --NOT INCLUDED IN THE DEIS .**

These are CURRENTLY being constructed directly across the street from the equine facility and the NBAF site. There will be parking and visitors from out of state to attend sporting events in this area, which is currently uninhabited. UGA apparently did not make this fact known when offering up its site across the street. The DEIS did not contain any analysis of environmental impacts on this newly populated site, which is being constructed right now.

[http://onlineathens.com/stories/111407/ugaqnews\\_20071114085.shtml](http://onlineathens.com/stories/111407/ugaqnews_20071114085.shtml)

### **UGA plans athletic field additions for club sports**

**Estimated to cost \$2.5 million**

The University of Georgia plans to spend \$2.5 million to build three new athletic fields - not for the university's rich athletic department, but for its considerably less wealthy club sports teams.

The University System Board of Regents signed off Tuesday on the plan that would put club sports fields across South Milledge Avenue from the State Botanical Garden of Georgia.

Until recently, UGA's College of Agricultural and Environmental Sciences used the land, but will relocate animal and dairy science operations to a farm in Oglethorpe County.

Like UGA's football and basketball teams, UGA club teams compete against teams from other colleges and universities.

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Unlike the football and basketball squads, club sports players are nonscholarship students who largely pay their own way, said Mitch Gartenberg, director of recreational sports in the Ramsey Student Center for Physical Activities.

"Club sports are in between intercollegiate and intramural sports," Gartenberg said.

UGA fields 42 club teams with about 1,700 players, Gartenberg said. The clubs compete in outdoor sports such as men's and women's ultimate Frisbee, rugby and lacrosse, as well as indoor sports such as table tennis and water polo.

UGA's recreational sports department will spend about \$51,000 from student activity fees on club sports this year, mainly for uniforms and playing equipment, Gartenberg said.

The UGA Athletic Association, which runs the university's football, basketball and other intercollegiate sports programs, by contrast brought in \$71.5 million last year and spent just under \$54 million.

The new club sports complex won't look like an Athletic Association sports field, either. The fields won't have spectator seating or press boxes for sports reporters and TV cameras.

The plans call for a large grassy area divided into three pitches, or playing fields, Gartenberg said. If all goes well, the fields could be completed by next fall.

Besides converting pastures into playing fields, the \$2.5 million also will pay for parking lots and lights so players can practice or compete at night, Gartenberg said.

Moving club sports from UGA's intramural sports complex off College Station Road will allow more students to participate in intramural sports, he said.

The number of intramural sports athletes is up nearly 1,800 students over the past five years, about 20 percent, he said.

One of the nine playing fields at the College Station Road intramural sports complex also will be converted to a practice field for the UGA Redcoat Band, UGA officials announced earlier this month.

The new fields on South Milledge Avenue also will allow club teams to schedule matches on the same day of UGA football games, Gartenberg said.

Club sports athletes haven't been able to schedule matches on home-game Saturdays in recent years because the intramural fields are used for RV parking on those days, Gartenberg said.

Published in the Athens Banner-Herald on 111407

**DROUGHT CONDITIONS IN ATHENS**

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<http://www.caes.uga.edu/topics/disasters/drought/index.html>

9| 12.2

The DEIS is deficient in terms of water use environmental impacts in Athens. There is very little discussion of the GEORGIA Drought in the DEIS. The DHS shows a cavalier attitude towards the situation in Athens, which remains in EXTREME DROUGHT. The DHS needs to present an analysis of the future outlook for water as a potential large user. They should interview the State Climatologist and others who can provide long-term forecasts and an educated view of whether or not Athens can sustain new users such as NBAF. Above is a link to Georgia's leading drought site and below is a recent power point presentation by Dr. Stooksbury. There is ample information available on this topic, and the DEIS's lack of inclusion of it is, frankly, a disgrace and certainly can't meet NEPA process standards.

#### Current Southeast Drought Conditions

**July 28, 2008** - View this Power Point presentation by David Emory Stooksbury, Ph.D., State Climatologist and Associate Professor, Engineering and Atmospheric Sciences, UGA.

[Current Drought Conditions](#) (pps)

<http://www.dot.state.ga.us/maps/Documents/TrafficFlowMap/TrafficFlow>

LACK OF AVIATION INFORMATION

6 cont.| 21.2

There is a lack of information on flight patterns and opportunities for aviation incursions into the NBAF site in Athens in the DEIS (See information below from the DOT)

And considering the "impact" of 9/11/2001 on our country, the lack of inclusion of a realistic, historical scenario such as this for a LARGE AIRPLANE crashing into the NBAF is an appalling deficiency in the DEIS. THIS MUST BE INCLUDED.

7 cont.| 23.0

Will all the pilots at all the fields below be vetted, or will DHS consider RESTRICTING AIRSPACE

OVER THE NBAF? This should be analyzed in the FEIS.

[http://tomcat2.dot.state.ga.us/Aviation/Airport\\_Information/airport\\_info.cfm](http://tomcat2.dot.state.ga.us/Aviation/Airport_Information/airport_info.cfm)

#### Georgia Aviation Stats At a Glance

480 Total Landing Areas

103 Publicly Owned Public Use Airports

Comment No: 9

Issue Code: 12.2

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

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9 Commerical Service Airports  
 93 General Aviation Public Use Airports  
 2 Privately Owned Public Use Airports  
 245 Private Use Airports  
 118 Private Use Heliports  
 4 Private Use STOLports  
 1 Private Use GLIDERport  
 1 Private Use ULTRALITEport  
 8,805 Registered Aircraft  
 19,629 Registered Airmen

<http://tomcat2.dot.state.ga.us/Aviation/Home/index.cfm>

•

#### ECONOMIC MODELING DOESN'T INCLUDE DETRIMENTAL TRENDS

10 | 15.2

There is nothing in the DEIS to indicate that the DHS has taken into account all the people who will move away, won't retire to Athens, will not bring their businesses here or will relocate their businesses elsewhere.

There should be consultation with real estate professionals, the Board of Realtors in the Athens area, and others who have suffered the placement of a huge, dangerous facility in their neighborhood for impacts upon the price of real estate. Already you have heard testimony from people who find their homes becoming depreciated just with the possibility of the NBAF locating here in Athens. This should be part of a study to assess the TRUE economic impacts of the NBAF.

#### THERE IS NO WAY TO PREDICT THE DANGER TO CITIZENS FROM TERRORISTS TARGETING THE NBAF FACILITY.

6 cont. | 21.2

Nevertheless the DEIS should have included—and any future documents must include—reported examples of terrorists found with PLUM ISLAND lab plans in their possession, the question of security measures to prevent scientists from taking pathogens from the lab, and an assessment of these sorts of dangers of living near this huge new target. These realistic disaster scenarios should be "modeled" in detail just as the other hand-picked potential problems were in the DEIS. It would be negligent to exclude them in future versions.

Comment No: 10

Issue Code: 15.2

DHS notes the commentor's concern. A discussion of the effects of the NBAF on property values was included in Section 3.10 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.

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11 | 25.2

In closing, a personal note. Those of us who do not want NBAF in Athens have been called NIMBYS. I am such a NIMBY, for good reason. I have already had Plum Island in my back yard, (in Westchester County, New York, where I lived for twenty-eight years before moving to ██████████ in 2004), and I believe my family has suffered enough from the secrecy and carelessness surrounding a huge government germ lab.

While on a vacation to North Carolina in 1985, my healthy then husband was suddenly stricken with a splitting headache which wouldn't go away, terrible body aches, buckets of sweat. He had a bullseye rash on his back. He literally couldn't move for a couple days. The local doctor had no idea what it was. Maybe Rocky Mountain Spotted Fever, or something else from a mosquito or a tick. When we got home he was diagnosed with Lyme Disease and a round of antibiotics was given. (He would have it three more times.) One of my children would have Lyme about ten years later. My cat ceased moving one day. She was the first kitty my vet ever saw with Lyme Disease. My brother visited me from the South on his way to Boston to give a professional paper. He could not get out of bed and could not give his paper. The diagnosis: Lyme disease, from taking in some sun on our lawn full of deer ticks.

Eventually my town became grimly known as "the Lyme Disease capital of the Universe."

In all this time, I never once heard about Plum Island. We were told that Lyme Disease came from Old Lyme, Ct. Although the government and you gentlemen and ladies are unable to acknowledge the fact, it is now obvious to some, who have bothered to look beyond "Old Lyme, Ct."—including you, I'm sure-- that the disease probably came from the work being conducted at Plum Island. And West Nile Virus wasn't far behind. We didn't connect the dots on that one, either. And I guess we will never really know what really happened with these two pathogens.

Someone else moved to my town of ██████████ New York a few years ago. I'm not surprised, therefore, that she is today one of the biggest opponents of keeping Plum Island as the NBAF site. She has a lot more clout than I do:

Her name is Senator Hillary Clinton.

She has undoubtedly heard the horror stories of her neighbors in Chappaqua; one of them recently had a book about Lyme Disease published.

[http://www.amazon.com/Cure-Inside-Epidemic-Pamela-Weintraub/dp/0312378122/ref=cm\\_lm\\_f\\_tit\\_1](http://www.amazon.com/Cure-Inside-Epidemic-Pamela-Weintraub/dp/0312378122/ref=cm_lm_f_tit_1)

Unfortunately her family fared much worse than mine, medically speaking.

11 cont | 25.2

Yes, I'm a NIMBY. I didn't move to the beautiful, bucolic ██████████ to have myself, my family and my farm animals exposed to some new disease that no one will ever admit escaped from NBAF.

Comment No: 11

Issue Code: 25.2

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

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Or have some mad scientist leak it out on purpose.

Or a terrorist crash a plane into the building.

I don't want to live in fear of a mosquito bite.

11 cont. | 25.2

And above all, I don't want to live five miles from a lab that is promised to be "transparent" but can't and won't be. So no matter how lofty your motives, and how needed the research, as long as you can't level with the American people about what happens at this NBAF, it really ought not to be placed in the midst of innocent human beings.

PLEASE ADDRESS ALL THESE ISSUES IN A SUPPLEMENTAL EIS AND DISQUALIFY ATHENS GEORGIA AS A SITE FOR THE NBAF. Restart the "contest" on US territory that is not near human and animal populations.

In closing, I'd like to tip my hat to Grady Thrasher, Kathy Prescott, and Matt DeGennaro for their unflagging efforts to bring the facts on all sides of the NBAF issue to the people of Athens. Without their efforts at the [www.athensfaq.org](http://www.athensfaq.org) site, there would be little if no public awareness of the issues surrounding NBAF.

Thank you for your service to our country. Now please, go and do the right thing.

Sincerely,

Judith Ann Wright

[Redacted]

[Redacted] Georgia [Redacted]

[Redacted]

PS. A hard copy of most of this letter with attachments ( but minus the personal note) was sent via the US Postal Service today. Please consolidate the two of them.

Wright, PhD, Thomas

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PD0180

August 22, 2008

1| 5.0 Hello. I have written and I am calling to give my thoughts regarding the proposed NBAF Project. Based upon the information that I have on hand, I do not believe that this type of facility can be safely maintained at any mainland site. There's several reasons for my concern. I am a Ph.D. who is well conversed with various statistical modeling procedures and, quite frankly, I'm very disturbed that a concise definition of what constitutes "safely" has not been presented for audience consideration.

2| 21.0

3| 21.4 Certainly, a more thorough presentation of the potential risk needs to be undertaken before a decision can be intelligently made. I'm very concerned (as a resident of ██████████ Kansas) that due consideration of the fact that this is tornado country (one which struck the Kansas State University Campus in June of this year) has not been taken into consideration. It was estimated that substantial damage to the campus was done at a Level 1 tornado that touched down earlier in Manhattan and the town of Chapman as a Level 3 and 4 and did widespread devastation. What would happen if it was to hit a lab? Quite frankly we're in tornado country and these considerations, along with the fact that we have higher than average wind, makes Manhattan, I believe, a poor choice. But I do believe also that no mainland facility should be considered because of the tremendous dangers that I don't believe have been adequately considered at this time.

1 cont.| 5.0

My name is Thomas Wright, and I'm a ██████████ Kansas resident.

Thank you for this opportunity. Good bye.

Comment No: 1                      Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland sites, in particular, the Manhattan Campus Site. 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: 21.0

DHS notes the commentor's concern regarding safety. 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: 3                      Issue Code: 21.4

DHS notes the commentor's concern regarding risk, especially with regard to tornadoes and their impact on 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.

Wright, PhD, Thomas

Page 1 of 1

WD0473

**From:** Tom Wright [REDACTED]  
**Sent:** Friday, August 22, 2008 10:26 AM  
**To:** NBAFProgramManager  
**Cc:** [REDACTED]  
**Subject:** National Bio and Agro-Defense Facility

Mr. James V. Johnson:

- 1| 5.4 I am writing to give my thoughts regarding the proposed NBAF project. Based upon the information that I have on hand, I do NOT believe that this type of facility can be "safely" maintained at a mainland site.
- 2| 21.0 There are several reasons for my concern. As a Ph.D. well conversant with various statistical modeling procedures, I am very disturbed that a concise definition of what constitutes "safely" has not been presented for audience consideration. Certainly, a more thorough presentation of the potential risks needs to be undertaken before a decision can be intelligently made. As a case in point, I am very concerned that no apparent consideration has been given to the fact that Manhattan, Kansas is in tornado country and that a tornado did, in fact, do very substantial damage to the Kansas State University campus in June of this year! Furthermore, it was estimated that by the time the tornado hit campus it was reduced to a level one. How substantial would have been the damage when it touched down in another part of Manhattan as a level 3 or 4 tornado? Just ask the residents of the Miller Ranch Manhattan, KS subdivision (or residents of the town of Chapman, KS), who suffered widespread destruction! One needs to enter these REAL possibilities into their model and then one can talk more intelligently about levels of "danger" and "safety". Tornadoes are much more likely in this part of the Midwest than in other parts of the country. Another factor to consider is that this part of Kansas has higher than average wind; the better to help disseminate dangerous pathogens through the air.
- 3| 21.4
- 1 cont.| 5.4 My vote is a strong no for any mainland site, especially Manhattan, Kansas.
- Thank you for your consideration of my comments.
- Thomas Wright, Ph.D.  
[REDACTED]
- Dated 8-22-08

Comment No: 1      Issue Code: 5.4

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative.

Comment No: 2      Issue Code: 21.0

DHS notes the commentor's concern that NBAF operations could result in an accident. The robust risk assessment included in Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. 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.

Comment No: 3      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.

Wright, RN, Kay

Page 1 of 1

WD0798

**From:** [REDACTED]  
**Sent:** Monday, August 25, 2008 5:02 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF

To whom it may concern:

- 1| 5.0 | As a registered nurse, I have many concerns regarding having a level 4 facility anywhere on the US  
 mainland. In discussions with other interested individuals, I am very concerned with the lack of an  
 2| 19.4 | appropriate operationalization of just what constitutes "safe" and "safety". An adequate definition of what  
 constitutes "safe" should be the bedrock of any proposal involving potential human risk to life. I strongly  
 urge not building anywhere on the mainland, especially not in Manhattan which is subject to very strong  
 winds and tornados – one actually landed very close to the proposed site this past June and caused  
 3| 21.4 | extensive damage.

Thank you for your consideration.

Kay Wright, RN

Comment No: 1      Issue Code: 5.0

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

Comment No: 2      Issue Code: 19.4

DHS notes the commentor's concern. A discussion of human health and safety is included in Section 3.14.

Comment No: 3      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.

## Wyards, David

## Page 1 of 1

PD0204

August 22, 2008

1| 15.4 Hello. My name is David Wyards. I am a citizen of ██████████ Kansas. I was at the meeting there this summer and I asked who is covering liability and insurance for this project. In other words, if there is an accident who pays the hospital bills? Who pays for retaining and obliterating this...these diseases once they get out? I got no answer. I was told they hadn't considered liability. This is a very big part of the whole picture. And it amazes me that we're being asked to consider this facility in our community without this aspect being addressed at all. In other words, does the facility get general immunity from any sort of liability like the nuclear industry does? Are tax...is there a fund to pay for people's health care who are affected by an accident at this facility? These are serious issues and they need to be discussed, decided, and addressed before this process goes any further.

2| 2.0 My other concern is what is the role of Homeland Security in this facility? How does this extend beyond simply researching diseases? Homeland Security thus far proves to be a shadowy bureaucracy without enough transparency for working in a true democracy. I...we need to know if there...if biological weapons are going to be developed here? Are biological weapons going to be tested here at this facility? What is the research with Homeland Security? Why are they involved in this? Are weapons that are developed by the military in the Colorado facility going to be tested and experimented with here?

3| 26.0 There were eight proposed diseases to be studied. But of course, once the facility is built it's a thirty/forty-year facility perhaps more. Many new diseases will appear of their own. And if this facility is also going to be studying diseases developed by the military or diseases that are microbes and viruses that are altered by the military or conveyance systems devised by the military. All of this goes far beyond the eight: seven viruses and one bacteria that the EIS looked at. I feel that the EIS needs to look at more broader reaching considerations than these eight pathogens. The resistance of bacteria is growing exponentially around the world. Virulence is increasing in bacteria – bacterial disease around the world and only one bacterial disease was considered. This EIS is inherently flawed in not considering broader ramifications of what other diseases may be studied in the next thirty to fifty years. And it's also flawed in not considering liability in case of mishaps.

Thank you very much.

Comment No: 1                      Issue Code: 15.4

The determination of criminal or civil liability arising from an accidental or intentional release of a pathogen is beyond the scope of this EIS. It is also not possible to accept or reject a claim for damages until the specific facts of an incident are known and the applicable local, state or Federal law is applied.

Comment No: 2                      Issue Code: 2.0

DHS notes the commentor's concern regarding the government's intentions for the facility. The NBAF's mission is defensive and would not involve offensive bioweapons research or development. The international treaty known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.

Comment No: 3                      Issue Code: 26.0

DHS notes the commentor's opinion. If directed to study additional pathogens in the future, DHS would evaluate the potential effects of an accidental release and determine if the effects are bounded by the evaluation conducted in the NBAF EIS. If not, a separate NEPA evaluation may be required prior to initiating any new research. See response to Comment No: 1.

Wyatt, Joan

Page 1 of 1

PD0026

July 25, 2008

1|25.3 | My name is Joan Wyatt. I live in ██████████ North Carolina. I would like to voice my strong negative feelings about the NBAF and my opposition to it.

I would like to....I have read the EIS report and think it is a farce.

I would also like to say that if they insist on....by they I mean North Carolina Consortium....insist on sliding this lab on into Butner, then they'd be faced with something very similar to the Chinese Tiananmen Square.

Thank you very much.

Comment No: 1

Issue Code: 25.3

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

Z, Ada

Page 1 of 2



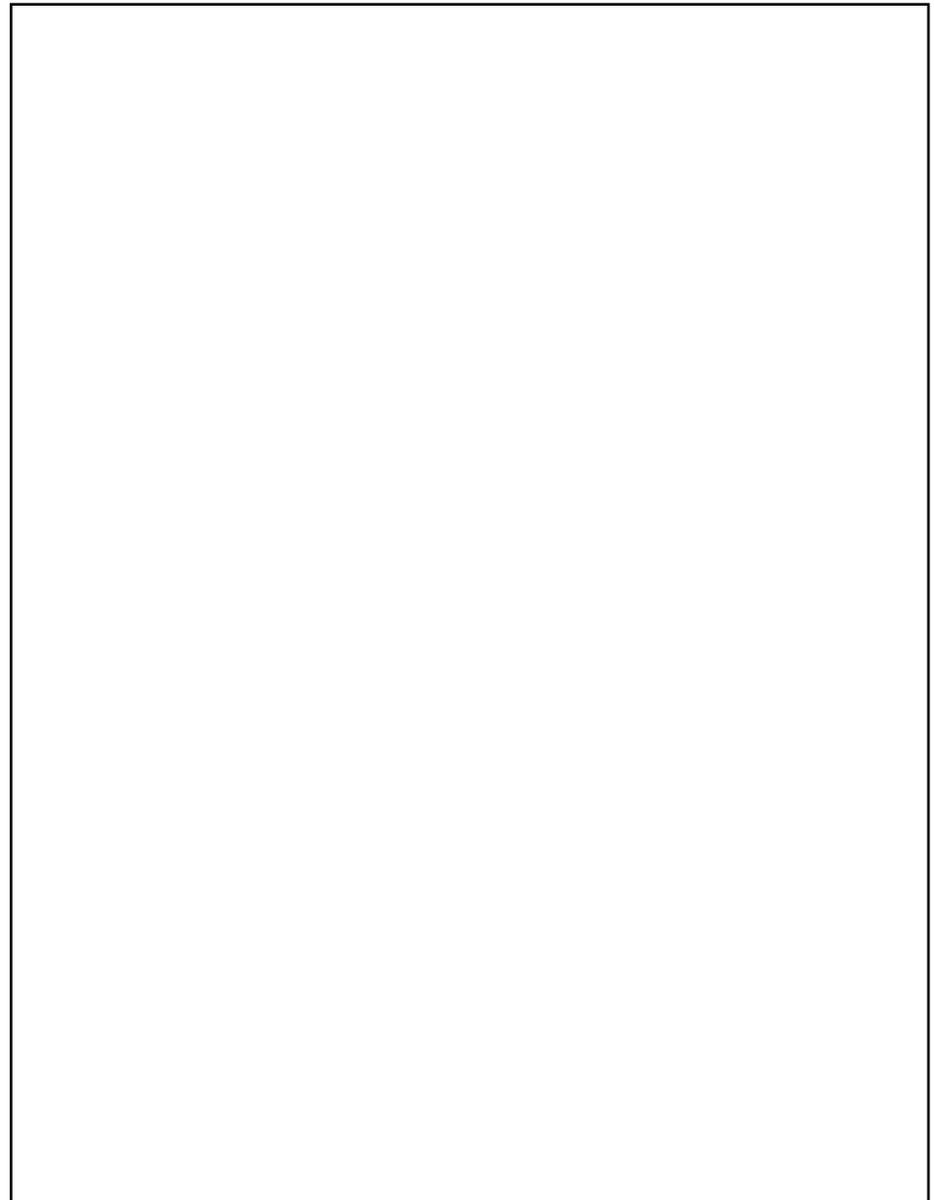
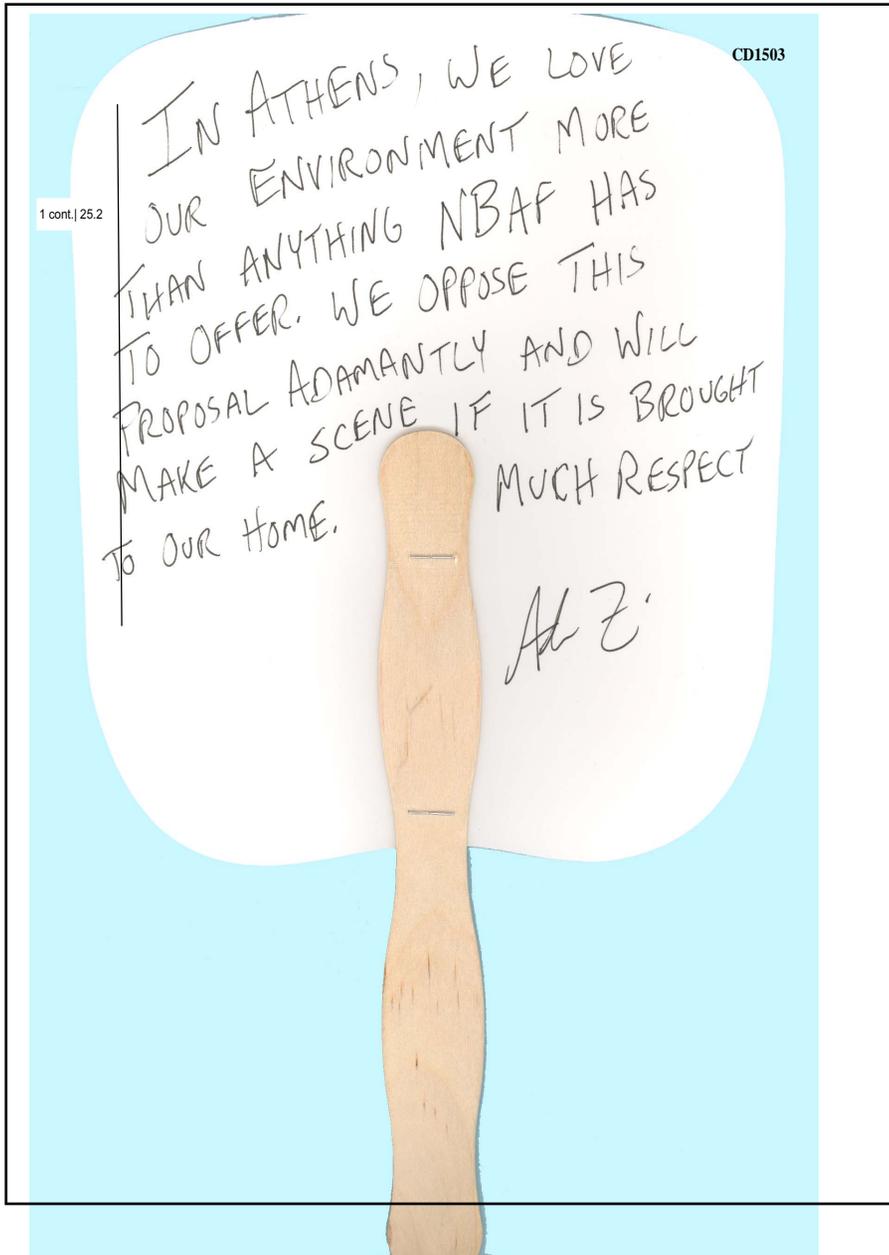
Comment No: 1

Issue Code: 25.2

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

Z, Ada

Page 2 of 2



## Zawadzki, Rebekah

Page 1 of 1

WD0144

**From:** Rebekah Zawadzki [REDACTED]  
**Sent:** Friday, August 01, 2008 4:30 PM  
**To:** NBAFProgramManager  
**Subject:** opposition of the NBAF

1|25.4; I am a resident of [REDACTED] Kansas. I strongly oppose this lab in this area for the following  
 2|21.4; reasons. 1. This is Tornado alley. How can we feel comfort with a level 4 bio hazard facility in  
 3|24.1 the middle of our city with the storms that come through here. June 21, 2008 a level EF4  
 tornado destroyed parts of our town and KSU university along with the housing unit of a nuclear  
 reactor. 2. This is one of the largest beef producing states. If this facility were to have an  
 accidental breach or leak of contaminants, it would devastate the community. 4. They want to  
 have the facility in the middle of our city. A facility like this should be in a remote area to  
 minimize any risk of human/animal infection. Plum Island is an adequate distance from  
 residents and this facility should remain there. Thank you for you time.

Rebekah

Comment No: 1                      Issue Code: 24.4

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

Comment No: 2                      Issue Code: 21.4

DHS notes the commentor's concern regarding potential tornado impacts on 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.

Comment No: 3                      Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative based on risks to humans and animals. 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.

Zea, Steve

Page 1 of 1

Aug 25 08 10:23a KADC 3622892986 p.1  
FD0063



U.S. Department of Homeland Security  
Science and Technology Directorate  
James V. Johnson  
Mail Stop #210C  
245 Murray Lane, SW  
Building 410  
Washington, DC 20528

**Fax DHS: 1-866-508-NBAF (6223)**

Dear Mr. Johnson:

1| 24.5 We would like to register our support for the NBAF facility considering Mississippi. It would be a privileged to be a part of protecting our nation's security against bioterrorism. We believe the facility to be safe and secure.

We in Central Mississippi would truly embrace the opportunity of these new quality jobs. This will help to keep our bright young people in Mississippi. The quality of our educational institutions willing to collaborate is second to none in our nation.

Although we are located 60 miles north of the site its impact will be spread throughout Central Mississippi and the entire state. Please be assured our development organization will assist our neighbors and state officials in any way possible to have your facility in Mississippi.

Thank you.

Steve Zea, President  
Kosciusko Attala County Development Corporation  
124 North Jackson  
Kosciusko, Mississippi 39090

662-289-2981 Phone  
662-289-2986 Fax  
[steve@kadc.com](mailto:steve@kadc.com)

124 North Jackson Street Kosciusko MS. 39090 662-289-2981 Fax 662-289-2986

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.

Zechella, Nancy

Page 1 of 1

WD0593

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**From:** Nancy zechella [REDACTED]  
**Sent:** Sunday, August 24, 2008 10:29 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF scoping comment

Dear Mr. Johnson,

1|25.2 |Please include the remarks below in opposition to the NBAF being sited in Athens, GA.

2|5.1 |"If you should listen to Clinton and Bishop in regards to Plum Island being too close to a metropolitan area, New York City, may I point out to you that the Athens proposed site is "closer" to metro Atlanta than Plum Island to NYC. Therefore, this NY argument would not hold water."

Respectfully submitted,

Nancy C. Zechella

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Comment No: 1                      Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative in favor of the Plum Island Site Alternative. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated in populated areas such as Athens. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

Comment No: 2                      Issue Code: 5.1

See response to comment No: 1.

Zechella, Nancy

Page 1 of 1

WD0708

**From:** Nancy zechella [REDACTED]  
**Sent:** Monday, August 25, 2008 11:56 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF scoping questions/Athens, GA

Dear Mr. Johnson,

1|25.2 | Will you please include the questions below as opposition to the NBAF being sited in Athens, GA.

2|15.2 | If DHS should choose the Athens, GA site, will individuals' health insurance premiums increase because of the risk of these foreign and incurable diseases being located here in town? Has the DEIS questioned this?

3|27.0 | Has the DEIS, or will the final EIS, question the psychological impact on residents living in Athens if NBAF should be sited here?

Athens/Clarke County's median age is approx. 25.7, significantly below average. UGA has had the reputation of being a party school for decades. Will the lack of practical experience of 32,000 college students have a negative impact if NBAF should be sited here?

Thank you.

Respectfully submitted,

Nancy C. Zechella  
 [REDACTED]  
 [REDACTED], GA [REDACTED]

See what people are saying about Windows Live. Check out featured posts. [Check It Out!](#)

Comment No: 1      Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue 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: 15.2

DHS notes the commentor's concern. It is not possible to speculate on the future cost of an individual's health insurance premium. The cost of health insurance is dependent on a broad range of factors ranging from the individual's physical health condition to his or hers employment status. DHS is not aware of any instance where health insurance premiums are influenced by the presence or absence of a research facility. Nevertheless, this issue is not within the scope of the NBAF EIS.

Comment No: 3      Issue Code: 27.0

DHS notes the commentor's concerns.

Zechella, Nancy

Page 1 of 4

WD0871

**From:** Nancy zechella [REDACTED]  
**Sent:** Monday, August 25, 2008 11:00 PM  
**To:** NBAFProgramManager  
**Subject:** Opposition to NBAF-Athens Drought

Dear Mr. Johnson,

I clearly remember the day and the shock of reading this article while sitting at a computer desk in the Cloister. I quickly ran back to the cottage where 8 other friends were, ranting and raving that I could not believe that our Athens newspaper printed these gross words: "Remember that hippie saying "If it's yellow, let it mellow. If it's brown, flush it down?"  
[http://onlineathens.com/stories/092407/living\\_20070924009.shtml](http://onlineathens.com/stories/092407/living_20070924009.shtml)

1| 12.2 | But after returning home, I realized what dire conditions Athens was in. To this day, almost a year later, I flush my upstairs toilet once a day...many of my friends do likewise. How in the world can Athens citizens live under these conditions and you think that there will be enough water for NBAF?

Here is another article from the Athens Banner Herald published the same week:  
[http://onlineathens.com/stories/092307/business\\_20070923022.shtml](http://onlineathens.com/stories/092307/business_20070923022.shtml)

Please add both articles to the scoping report in opposition of NBAF being sited in Athens, GA.

Sincerely,  
 Nancy C. Zechella  
 [REDACTED]  
 [REDACTED] GA [REDACTED]

Be the filmmaker you always wanted to be—learn how to burn a DVD with Windows®. [Make your smash hit](#)

Comment No: 1      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.

The South Milledge Avenue Site would have access to three surface water resources: the North Oconee River, the Middle Oconee River, and the Jackson County Bear Creek Reservoir. The access to these surface water resources would help ensure the availability of water in the event that any one of those sources becomes inadequate.

The articles have been included per your request.

Zechella, Nancy

Page 2 of 4

WD0871

**Water woes**By [Beth Jones](#) | Story updated at 10:02 PM on Monday, September 24, 2007

Yep, this whole drought thing sucks.

For one, there's the \$40 dogwood tree you planted last year that's looking pretty peaked. Then there's the whole "water is life" thing. As in, if we don't get rain between now and the end of October, we're all in big trouble. A little over a month's supply is how much water we've been told is left in our local supplies, people. A LITTLE OVER A MONTH. So below are some common sense tips we MUST ALL USE to conserve the precious H2O we have left. These suggestions aren't rocket science - just good reminders about how we can all do our part. And with these tips, you might just save that dogwood, too.

- Keep a pitcher next to the sink to collect water used for rinsing produce, making spaghetti, boiling eggs; use it on thirsty houseplants. Same goes for that ice cube you accidentally drop when getting it out of the tray.
- Also use water from the air conditioning condenser, bath or from washing dishes on plants - or the dogwood tree.
- Turn off the water while brushing your teeth. A faucet running full force spits out about 3 gallons of water in the time you brush your teeth.
- Take a short shower instead of a bath. Bonus points if you turn off water while lathering up. Extra bonus if you do this while bathing with your honey. Just remember to make it quick: The U.S. Geological Survey notes that typical showers use about 2 gallons of water per minute.
- Consider changing your showerhead. Water-saving showerheads let the water trickle out at a rate as slow as 1.2 gallons per minute.
- Bathe young children together. According to the U.S. Geological Survey, about 50 gallons of water is used every time you fill the tub for a bath.
- When fetching Kitty Bob fresh water, don't throw her old water down the drain. Throw it on the dogwood.
- Wash your carrots and cucumbers in a pan partially filled with water instead of running water over them from the tap.
- Designate one glass for your drinking water each day. That means less dishes to do each week.
- Run your dishwasher only when it's full. The U.S. Geological Survey reports dishwashers use about 20 gallons of water per load. On the other hand, washing by hand consumes about 5 gallons.
- Check outdoor faucets, pipes and hoses for leaks. According to the American Water Works Association, even a slow leak of 7 drips per minute would add up to nearly a gallon of wasted water a day.
- Check for toilet leaks this way: Add food coloring to the tank. If the toilet is leaking, color will spread to the bowl within 15 minutes.
- Make sure you have a high-efficiency toilet. (If your toilet is from 1993 or later, you're probably good).
- Consider this: Washing machines use about 10 gallons of water per load. So, unless you have a stain, wear your pants twice before washing them. If you're in a rock band, you can get away with wearing them indefinitely without washing them.
- Remember that hippie saying "If it's yellow, let it mellow. If it's brown, flush it down?" There may be something to it. According to the U.S. Geological Survey, 3 gallons of water are used every time you flush the toilet.

Sources: *The U.S. Geological Survey, The United States Environmental Protection Agency, The American Water Works Association, [wateruseitwisely.com](#), [h2ouse.org](#)*

**Are you using too much?**

Want to calculate how much water you use in a day? Visit the water calculator at [ga.water.usgs.gov/edu/sq3.html](http://ga.water.usgs.gov/edu/sq3.html).

Published in the Athens Banner-Herald on 092407

## Zechella, Nancy

## Page 3 of 4

WD0871

**Nelson: Conservation critical, but more needed****State drought**

| | Story updated at 8:54 PM on Tuesday, September 25, 2007

The record-setting drought parching our rivers, streams, lakes and reservoirs also could dry up economic development here, in our region and our state.

A Level 4 drought response policy, such as the one now in effect for Clarke, Barrow, Jackson and Oconee counties, call for a complete ban on outdoor watering for residential and commercial uses. A total ban naturally hurts landscaping businesses and nurseries, but if rain remains absent - mandating the ban - the pain will spread to other areas of our economy.

At the time this column is being written, we have about a month-and-a-half supply of water left in the Bear Creek Reservoir, a source for Barrow, Clarke, Jackson and Oconee counties. That's a dire condition for a resource that was developed to be our backup in times of serious drought. We tapped into it heavily in 2002, the year it began filling up, when another severely dry year slapped us around.

While this arid monster throttles us in its grasp, residents and leaders alike must get their own grip on conservation, not just in dry times, but year-round. Athens-Clarke commissioners said as much last Thursday night.

Environmentalists and other experts have been advocating conservation for decades. They urged us to be prepared for this kind of drought, but we waited until Mother Nature put a water gun to our heads before beginning to take measures for cutting water usage.

As far back as 2000, Athens-Clarke County designed a drought management plan that calls for an outdoor watering ban to reduce water usage by 20 percent - as dictated by state regulations - during serious droughts. Call it a reactionary plan, though.

The one shortcoming of that policy is that it was established for extreme circumstances. Until conditions get really bad, it's business as usual, and most people just assume water is an unlimited resource.

Experts call that approach toward the water supply the hydro-illogical cycle: when we have plenty of water, it's full steam ahead, no concerns. As supplies dwindle, people begin taking notice, then they become concerned and finally they panic as water reserves become scarce.

When Athens-Clarke first merged its city and county services, various suggestions had been made to address free-flow water use in our county. Conservation programs including a requirement of low flow faucets and toilets, charging extremely high-volume users a higher rate, offering discounts and incentives for demonstrating reduced use or for implementing conservation programs didn't seem to get much attention.

The situation seems similar to the global warming issue or any environmental concern that might inconvenience our lifestyles or pocketbooks. Suggesting any constraints on businesses brings an outcry. The potential problems are instead pushed aside or ignored until they become a crisis.

Now the drought has people's attention, but will that concern remain? The commission is calling for year-round conservation - a reasonable step - but the commission might have to tackle some tougher issues.

Back before the Bear Creek Reservoir was built, studies based on a moderate growth rate for the region predicted the population count of the four counties using the lake would be about 183,000 in 2000. When 2000 arrived, the number actually exceeded 215,000.

That meant water demands would exceed the Bear Creek usage projections as growth continued in the area, especially at the rapid rate of development in Barrow, Jackson and Oconee counties. Construction of homes, apartments and condominiums also continue in Athens.

As more residential properties are constructed, the demand for water will continue to rise. The commission will need to consider those factors in addressing water resources for the future.

Likewise, as we salivate over the prospects of biotech businesses or any major industry coming to our community, those industrial water needs will be a major concern both in the company's decision to come here and in the community's capability of providing the needed level of water needed.

Our environmental and economic health is going to depend on good answers to providing adequate supplies of clean water. As Scott Weinberg, a member of the Athens-Clarke County Planning Commission once said, a clean environment and water are paramount to the health of the community and the economy.

**Zechella, Nancy**

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**WD0871**

Like the rest of the state, this region is up the creek, but we haven't lost our paddle yet. If we don't address the long-term aspects of water, though, we will find ourselves in that proverbial predicament.

Published in the Athens Banner-Herald on 092307

Zechella, Nancy

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WD0520

**From:** Nancy zechella [REDACTED]  
**Sent:** Friday, August 22, 2008 9:18 AM  
**To:** NBAFProgramManager  
**Cc:** [REDACTED]  
**Subject:** DHS -NBAF DEIS comments/questions Athens, GA

Dear Mr. Johnson,

Please include the remarks below for the NBAF DEIS scoping comments, Athens, GA.  
 Thank you.

Nancy C. Zechella  
 [REDACTED]  
 [REDACTED] GA [REDACTED]

1| 4.2 | The Department of Homeland Security has left this community with so many unanswered questions regarding the effects of the NBAF. Monday, August 25, 2008 is the last day citizens may email DHS [nbafprogrammanager@dhs.gov](mailto:nbafprogrammanager@dhs.gov). I think every citizen should weigh all the ramifications and consider our legacy to future generations.

2| 15.2 | According to the Government Accountability Office, Plum Island Animal Disease Center report dated 12/17/07, there is concern regarding response capability in case of a terrorist attack. Athens projected population in 2010 is 909.8 people per square mile. We are the smallest county in the state and sixth most populated per square mile. Will our police department, fire department, and hospital personnel be trained to respond to a terrorist attack at NBAF? Who will pay for this training? Are there enough school buses, to get children home when everyone is dismissed at the same? Does ACC have sufficient roads to get all citizens out of town? Would there be public transportation for the elderly and those without automobiles? Will NBAF have a quarantine room on-site or will our public hospitals treat people infected with one of these incurable diseases?

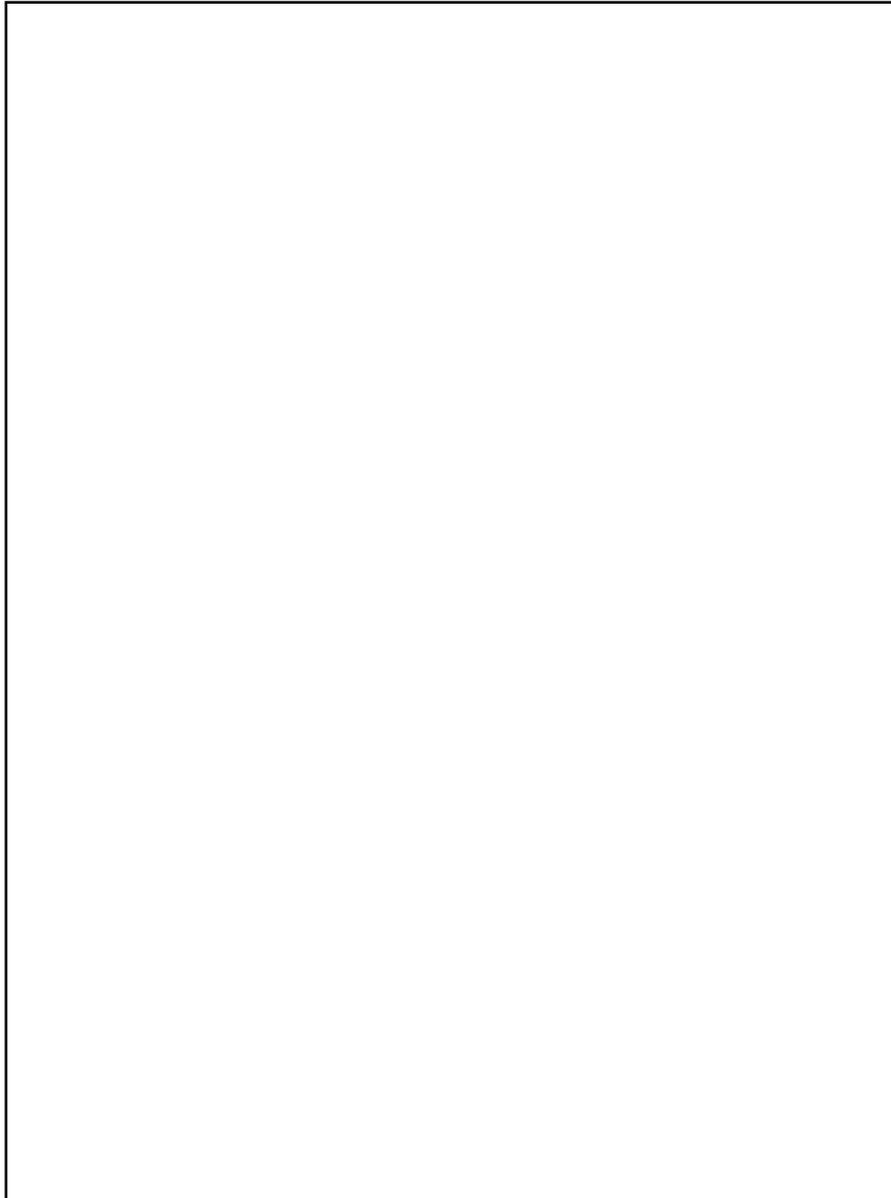
3| 21.2 | Or what if a parcel carrying one of these foreign viruses explodes in transport, as it did in the Federal Express building at the Columbus, Ohio, airport in 2003? Will there be a law to restrict transporting these deadly diseases through our neighborhoods? What if a tornado or other natural disaster strikes the NBAF facility?

What is the government's plan in the case any of these scenarios actually

Comment No: 1      Issue Code: 4.2  
 DHS notes the commentor's statement.

Comment No: 2      Issue Code: 15.2  
 DHS notes the commentor's concern. 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. The risks and associated potential effects to human health and safety are evaluated in Section 3.14 of the NBAF EIS. The risks were determined to be low for all site alternatives, and the probability of a release requiring a quarantine or evacuation is very low. DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans would also include training for local law enforcement, health care, and fire and rescue personnel.

Comment No: 3      Issue Code: 21.2  
 DHS notes the commentor's concerns regarding the impact of an pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As discussed in Section 3.14.3.4 employees and contractors would be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6, would be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the



proposed NBAF. Site-specific standard operating procedures and emergency response plans would include procedures for communicating to the public.

Zechella, Nancy

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WD0520

3 cont.] 21.2 | happen? How will citizens of Athens be informed of a security breach, how will we be informed of what to do, and is the city prepared and capable, logistically and financially, to handle this?

4] 23.0 | Even if we were never faced with these not-so-improbable doomsday events, a number of questions remain on the effects of the day-to-day operations of a lab that performs such high-risk experiments. For example, will this new lab adopt the same practices as the lab on Plum Island, where they incinerate the infected animals and the prevailing winds flow to the Atlantic Ocean. Will NBAF use an incinerator and burn carcasses? How will this affect the air quality in Athens and of our neighbors downwind?

5] 18.2 | Will NBAF use a rendering type disposal method, where the carcasses are converted into carcass meal, melted fat, and water? How will this, plus the everyday waste sewage, affect the waters in the Oconee River, Greensboro's drinking water, and Lake Oconee? Will DHS have regular weekly analysis of Lake Oconee and the Oconee River waters?

6] 12.2 |

7] 2.0 | In the 1980's, President Reagan signed an executive order mandating that functions such as those performed by support workers at Plum Island Animal Disease Center be privatized. Will NBAF support workers be federal employees or privatized? Will these workers be unionized? Will NBAF face a strike as did Plum Island and the sabotage of equipment by one of these workers? Who will be the private contractor and how will they protect us from disgruntled or even careless employees?

5 cont.] 18.2 | The concerns mentioned above beg questions about who will be performing waste disposal, or even further, who exactly will be working in any capacity at this facility? According to the Government Accountability Office, Plum Island Animal Disease Center report 12/17/07, there was a security concern regarding criminal background checks for contractors and visitors at the Plum Island facility. Will DHS have Federal Protective Service on the NBAF property 24 hrs. a day and will FPS check through the National Crime Information Center regarding criminal background checks on all contractors and visitors? Will they also do the same for students attending classes at NBAF? Will DHS have this in their budget and will their budget support this for the next 50 years?

7] 2.0 |

8] 21.0 | During the May 22, 2008, Congressional Hearing, Representative Bart Stupak said there had been 103 breaches of containment in BSL-3 (animal to animal pathogens) & BSL-4 (animal to human pathogens) labs in the last 3 1/2 years. He went on to say 90% are due to human error. Daniel A. Goodenough, Takeda Professor, Harvard Medical School, Dept. of Cell Biology in a statement on Oct. 15, 2007, said: "I am only too well aware that biologists, like all people, are human. I speak from personal experience that we are not immune from errors, both in judgment and with our hands. I have seen very well-meaning scientists (myself included) cut corners with routine safety rules..." NBAF scientists will study pathogens that pose a high-risk of life-threatening diseases for which there

Comment No: 4      Issue Code: 23.0

DHS notes the commentor's concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, would be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. NBAF would research the transmission of these animal diseases and develop diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. All work activities would be reviewed and approved by the IBC and APHIS. Future research on pathogens would follow regulations and DHS policies for conducting biological research.

Comment No: 5      Issue Code: 18.2

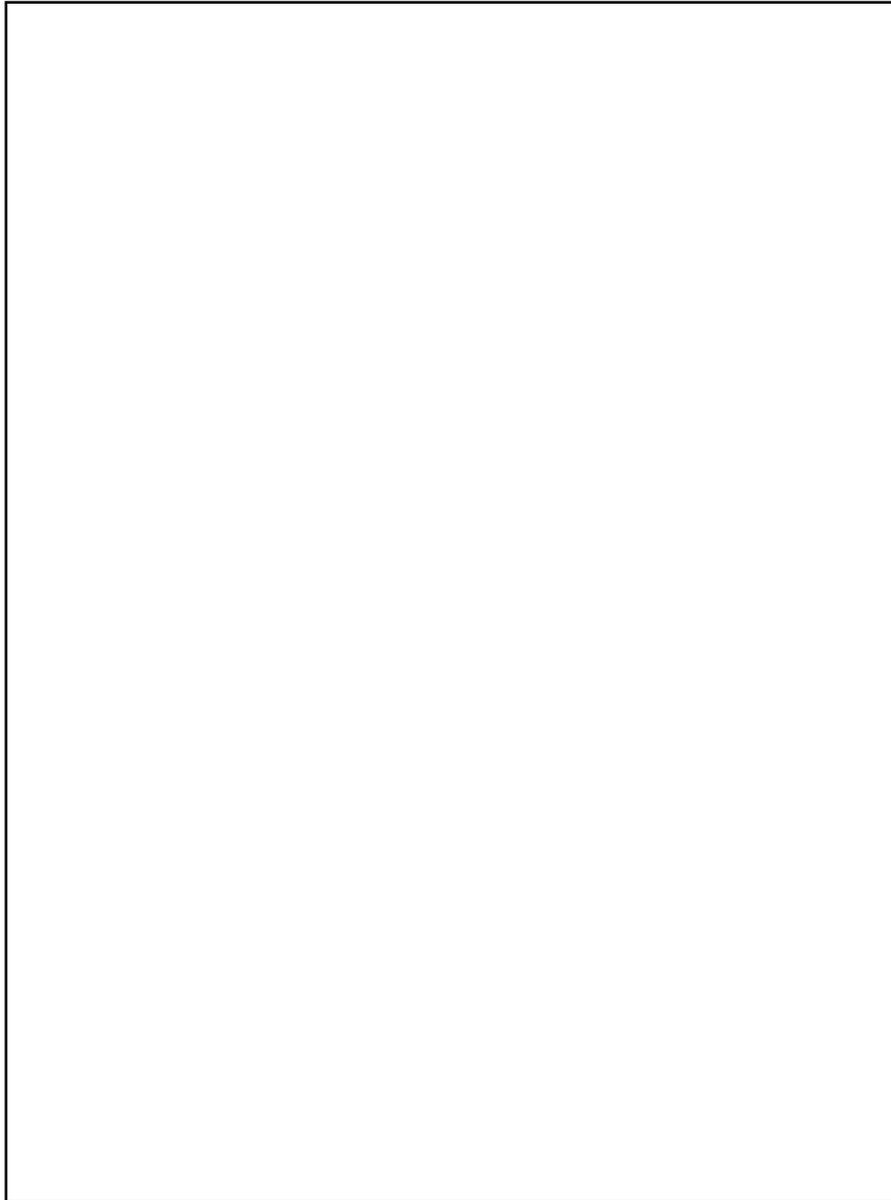
DHS notes the commentor's concern regarding animal carcass waste disposal. Section 3.13.2.2 of the NBAF EIS addresses the technologies being considered for the treatment and disposal of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). The final design for the NBAF would probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. Onsite waste management would be performed by NBAF employees.

Comment No: 6      Issue Code: 12.2

DHS notes the commentor's concerns regarding possible impact to the area's water resources. The NBAF would be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.13.4 of the NBAF EIS describes the waste management processes that would be used to control and dispose of the NBAF's liquid and solid waste. Sections 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects. DHS would be required to comply with permit-established monitoring requirements.

Comment No: 7      Issue Code: 2.0

DHS notes the commentor's concern regarding security. A Threat and Risk Assessment (designated as For Official Use Only) was conducted independently to characterize the threat from many sources including an inside threat. Appropriate screening methods would be used on all employees and researchers including those with access to infectious agents.



Comment No: 8                      Issue Code: 21.0  
DHS notes the commentor's concern regarding management oversight protocols and plans. As noted in Comment No. 2, all work activities would be approved by the IBC and APHIS.

## Zechella, Nancy

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WD0520

4 cont. | 23.0 | is no known vaccine or cure, who will oversee the scientists? Will there be cameras filming their every move? Bruce Ivins comes to mind here.

3 cont. | 21.2 | The DEIS states: "The warm climate and aquatic habitat suitable for arthropod vectors (mosquitos, fleas, ticks, etc.) would increase the likelihood that the RVF (Rift Valley Fever) would establish a sustainable reservoir." Should a release of vector-borne pathogens occur, what would be the impact of aerial spraying of insecticides? What radius in miles from NBAF would the aerial spraying take place? What chemicals would be used? How would they affect our children and pets playing outdoors, backyard vegetable gardens, expectant mothers, bodies of water (fish ponds, swimming pools, or rivers)? How many years would we have to endure this spraying? If they should choose to spray from trucks as Suffolk County, NY, does (the county closest to Plum Island), will there be a "No Spray Law" where residents may request their property to be void of chemical spraying? Will Athens Clarke County be sued for spraying potentially cancer-causing chemicals, just like Suffolk County was? Will spraying be at the expense of ACC?

9 | 19.2 | During the Congressional Hearing, DHS's Jay Cohen stated that deer could transmit Foot and Mouth disease just as easily as cattle. The proposed site in Athens is next to Whitehall Forest, Oconee River, and nature trails at the State Botanical Garden where deer roam freely. If there should be a breach of containment of Foot and Mouth, will they exterminate all of the 1.2 million deer inhabiting the state or only the infected population? How will they go about doing this? In addition, deer bring in more than \$800 million per year in hunting license fees, sporting equipment sales, food and land leases; needless to say, they are a valuable natural, recreational, and economic resource of Georgia. If a deer contamination occurs, how will this affect the state economy?

11 | 13.2 | DHS has listed 8 diseases it will study, but will there be any other pathogens on the premises? During the next 50-year span, will NBAF introduce other pathogens into its program that could be transmitted from human to human?

12 | 15.2 | Larry Barrett, former director of Plum Island Animal Disease Center, has repeatedly talked about the cost of housing near Plum Island, the lack of other research facilities nearby, and the annoyance of taking a ferry to work. Has the Department of Homeland Security put the convenience of the scientists before the safety of the general public?

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Comment No: 9 Issue Code: 19.2

DHS notes the commentor's concerns regarding insect spraying. DHS would have site-specific standard operating procedures (SOPs) and response plans in place prior to the initiation of research activities at the NBAF. Rift Valley fever (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.

Comment No: 10 Issue Code: 3.0

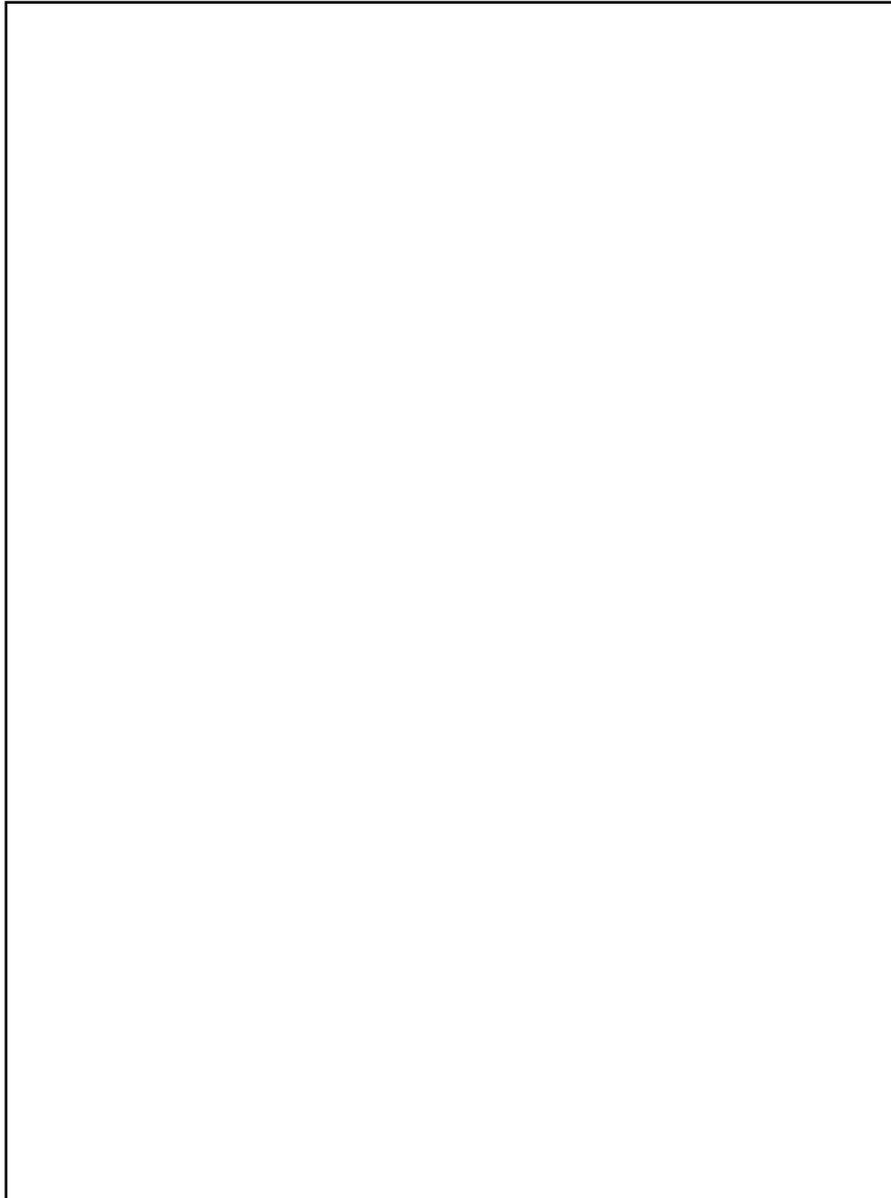
DHS notes commentor's concerns regarding insect spraying. The potential consequences of pesticide use would be evaluated during the preparation of a site-specific response plan. DHS would collaborate with local authorities to develop site-specific protocols that would consider the diversity and density of human, livestock, and wildlife populations residing within the local area and the fiduciary responsibilities associated with management actions.

Comment No: 11 Issue Code: 13.2

DHS notes the commentor's concern regarding the measures that could be used to control wildlife in the event of an accidental release. 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 response strategies that could be considered in the event of an accidental release. Depopulation or population reduction is one of ten potential foot and mouth disease 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 depopulating wildlife (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. Depopulation would only be feasible within a radius of a few miles; and therefore, a widespread outbreak would require alternative strategies.

Comment No: 12 Issue Code: 15.2

DHS notes the commentor's concern. The potential economic effects including those from an accidental release are discussed in Appendix D and Section 3.10.9 of the NBAF EIS. DHS cannot guarantee that the NBAF would never experience an accident however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as \$4.2 billion until the United States was declared foreign animal disease-free. A release of pathogens could also potentially affect wildlife populations. Information is limited on the possible role of wildlife in the maintenance and amplification of these pathogens. However, it is likely that the release would negatively impact regional hunting-related industries. As described in Sections 3.10.3 and 3.10.9, U.S. Fish and Wildlife Service data from 2006 shows that



total expenditures related to recreational hunting activities in the state of Georgia totaled \$678 million. The data show that of the 481,000 individuals who participated in hunting activities in 2006, 410,000 were involved in big game hunting (e.g., deer).

Comment No: 13                      Issue Code: 15.0

DHS notes the commentor's opinion regarding the final site alternatives. DHS held a competitive process to select potential sites for the proposed NBAF as described in Section 2.3.1 of the NBAF EIS. A team of federal employees representing multi-department component offices and multi-governmental agencies (DHS, U.S. Department of Agriculture, and Department of Health and Human Services) reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. A Record of Decision that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

Zeichner, Lauren

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WD0367

**From:** Lauren Zeichner [REDACTED]  
**Sent:** Tuesday, August 19, 2008 3:57 PM  
**To:** NBAFProgramManager  
**Subject:** Please, do not choose Athens, GA

I live, for the last thirty years, [REDACTED] from the proposed laboratory site. I travel daily on S. Milledge Ave. past the proposed site. There are shorter ways, but none more beautiful or uplifting. This is what I love about living here.

1|14.2; Construction of this lab, on this site, will destroy a beautiful, cultural resource of our community. It will devastate a  
 2|13.2; designated migratory bird corridor. Light pollution is impossible to mitigate.  
 3|7.2

4|5.0 Please, keep this facility off-shore.  
 Please, do not bring it here to ruin the most beautiful and ecologically sensitive part of our town.  
 Sincerely,  
 Lauren Zeichner

Comment No: 1      Issue Code: 14.2

DHS notes the commentor's concern regarding destroying cultural resources. A cultural resources assessment was conducted and submitted to the State Historic Preservation Officer, who concurred that no cultural or archaeological resources would be affected. Coordination letters are included in Appendix G.

Comment No: 2      Issue Code: 13.2

DHS notes the commentor's concern regarding potential effects on migratory birds in the vicinity of the South Milledge Avenue Site. 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 U.S. Fish and Wildlife Service advocates the use of shielded lighting to minimize adverse impacts on migratory birds. 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, would be considered in the final design of the NBAF. Compared to high-rise buildings and tele-communication towers, the height of the facility would be low (maximum of 90 feet). Given the relatively low profile of the building and the use of mitigation measures, significant lighting impacts on migratory birds would not likely occur.

Comment No: 3      Issue Code: 7.2

DHS notes the commentor's concern regarding light pollution but as noted in Comment No. 2 continuous outdoor nighttime lighting is a security requirement for the NBAF. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. However, the use of shielded lighting would minimize the potential for impacts in adjacent habitats. In addition, the NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigative measures would be considered in the final NBAF design.

Comment No: 4      Issue Code: 5.0

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

**Zenere, Antonio****Page 1 of 1**

WD0072

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**From:** [REDACTED]  
**Sent:** Monday, July 14, 2008 3:34 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF

1) 24.2 Hi, my name is Antonio Zenere, and I live at [REDACTED] GA [REDACTED] (better address,  
2) 15.2 [REDACTED] GA [REDACTED]. I think that the NBAF center would be a great idea for Athens.  
There are not many qualified jobs in this area, and I do not see how the research on vaccines would be  
dangerous for the population. We need jobs badly. Furthermore, I have 76 ac of underused land in  
3) 27.0 [REDACTED] GA, that I would be glad to offer rent-free, if you just would consider me for a job. Any job.  
Good luck. Dr. Antonio Zenere

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Comment No: 1                      Issue Code: 24.2

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

Comment No: 2                      Issue Code: 15.2

DHS notes the commentor's opinion. The economic effects of the NBAF at the South Milledge Avenue Site are included in Section 3.10.3 of the NBAF EIS.

Comment No: 3                      Issue Code: 27.0

DHS notes the commentor's request for employment consideration and offer of land to support the NBAF. Employment opportunities are not within the scope of the NBAF EIS and the site selection process is discussed in Section 2.3.1 of the NBAF EIS.

null, Janice

Page 1 of 1

WD0329

**From:** Janice [REDACTED]  
**Sent:** Monday, August 18, 2008 3:50 PM  
**To:** NBAFProgramManager  
**Subject:** Please don't come to Manhattan, KS

Hello,

1|25.4; | I don't think it's reasonable for a facility such as yourselves to come to the heart of cattle country. To be  
 2|21.4 | honest, it makes me quite scared. After the tornado, we all found bits & pieces of our west neighborhoods  
 on the east side of town. Imagine if that were deadly toxins and viruses.

2 cont.| | Our City staff, Chamber, realtors, etc are SO hungry for you to come here. Their immediate profit & fame  
 21.4 | is lost when cattle & people and livelihoods are lost forever.

1 cont.| | Please reconsider even the possibility of coming to Manhattan, Kansas with your facility. Thank you.  
 25.4

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 21.4

DHS notes the commenter's concerns. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents,, external events, and intentional acts. The risk of an accidental release of a pathogen is extremely low.

DHS notes the commenter'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.

The economic impact of an accidental release is presented in Section 3.10.9 and Appendix D of the NBAF EIS. While the risk of an accidental release of a pathogen is extremely low, DHS acknowledges that the possible economic effect would be significant for all sites. The economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss of \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to foreign bans on U.S. livestock products. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Manhattan Campus Site, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area, to include agricultural livestock. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. Emergency response plans will include the current USDA emergency response plan for foot and mouth disease (FMD) which includes compensation for livestock losses.