

**Anonymous PD0270, Anonymous PD0270**

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**PD0270**

August 24, 2008

1| 25.4 | I'm calling to register my opposition to the NBAF in Kansas. It is just a bad idea to bring foot and mouth disease to Kansas.

2| 24.1 | I think that should go on Plum Island.

Thank you very much.

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 24.1

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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 Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

## Anonymous PD0272, Anonymous PD0272

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PD0272

August 24, 2008

1| 25.4

I'm a Aurora, Riley County resident and I would like to state my opposition to the NBAF being located at Manhattan, Kansas. Due to the fact this is the center of the nation's breadbasket and what would happen if the smallest thing went wrong.

2| 21.4  
3| 2.0

We are already so close to Fort Riley, we're sort of a target for terrorists. And I'm afraid the reputation of Homeland Security is not very reassuring.

Thank you.

Comment No: 1                      Issue Code: 25.4

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

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: 3                      Issue Code: 2.0

DHS notes the commentor's statement.

## Anonymous PD0275, Anonymous PD0275

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PD0275

August 24, 2008

1| 25.4 | I would like to have on record that I am opposed to NBAF in Manhattan, Kansas. And I live at [REDACTED] I've lived in Manhattan for 13 years.

2| 5.0 | And I think that the dangers of such a facility far outweigh the benefits. I think that the  
3| 24.1 | proposed research that would go on here would be better off in...isolated on a island as it was on Plum Island rather than studying potentially fatal and deadly diseases for animals and humans here in the heartland where in fact the humans aren't concentrated but the animals are.

So I would like to have on record that I am against this facility in Manhattan, Kansas.

Thank you.

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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 Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

Comment No: 3                      Issue Code: 24.1

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

Anonymous PD0277, Anonymous PD0277

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PD0277

August 24, 2008

1| 25.4  
2| 5.0

Hi. I'm a Manhattan, Kansas resident. I've lived in Kansas since 1992. I work at Kansas State University. And I'm strictly opposed to having this NBAF facility built here in town. I think it is too high a risk. I think that such a facility needs to be built somewhere else – on an island where there is some water as protection around.

Kansas, with a significant amount of livestock and our town with many people, young people especially students, is simply not an appropriate place. And I feel that the risk really is in no relation to the economic benefits for our community.

Thank you.

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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 Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

**Anonymous PD0278, Anonymous PD0278**

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**PD0278**

August 24, 2008

1|25.4

I am a resident of Kansas and I think that this NBAF does not belong in the state at all.

Thank you.

Comment No: 1

Issue Code: 25.4

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

## Anonymous PD0279, Anonymous PD0279

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PD0279

August 24, 2008

Hi. I'm from Manhattan, Kansas. And I'm a little late getting comments in but a lot of people around Manhattan in the last couple of weeks have been really, really appalled at newspapers and our local newspaper and radio stations saying that the ones that don't speak out against it are totally for it. I guess that got us kind of started on let's do or say something.

1| 25.4  
2| 5.0

We are not, a bunch of us are not for it being in Kansas or on the mainland. And around Manhattan, Kansas what we've run into is people'll speak to us but they're afraid of losing their jobs because K-State pretty much runs the town. Farmers and ranchers are afraid to speak out. People...we try to get a message out in the newspaper and their men... just turn it on us. We're not against the Federal facility coming to Manhattan.

3| 21.4

We're against a germ lab coming because of the dangers and not of the facility or the building, but worker error. We just don't think it should be on the mainland anywhere. It just doesn't make sense to have a livestock diseases that could get out like hoof and mouth in the area.

2 cont.| 5.0

I just wish that you guys would take a more serious safety look at this and just put it somewhere where it can be protected with a no-fly zone or somewhere where its not right amongst animals or amongst young college kids in town.

3 cont.| 21.4

I thank you for listening but we just can't hardly get anything out around here because people are afraid for their jobs, which is a very sad thing. But please, please, please consider the safety issues of worker errors and that type of thing.

Thank you so much for letting me speak.

Good Bye.

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 5.0

DHS notes the commentor'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 NBAF. No-fly zones will be considered along with other security measures for the proposed NBAF regardless of the site selected.

Comment No: 3                      Issue Code: 21.4

DHS notes the commentor's concern regarding the potential consequences from a NBAF accident as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, 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. Training and inherent biocontainment safeguards reduce the likelihood of a release. 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, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

**Anonymous PD0280, Anonymous PD0280**

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**PD0280**

August 24, 2008

1|25.4 | I just want to say I do not support the NBAF in Kansas. I'm a resident of Manhattan, Kansas. Totally against this.

Comment No: 1

Issue Code: 25.4

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

**Anonymous PD0281, Anonymous PD0281**

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**PD0281**

August 24, 2008

1|25.4

I am not in favor of the germ research lab being in Kansas.

Thank you.

Comment No: 1

Issue Code: 25.4

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

Anonymous PD0282, Anonymous PD0282

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PD0282

August 24, 2008

1| 25.4  
2| 5.0

Yes, we are Kansas farmers. We do not NBAF in Kansas or on the mainland. We think this is a truly bad idea. It is endangering everything that's in the area.

Thank you.

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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 Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

## Anonymous PD0283, Anonymous PD0283

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PD0283

August 24, 2008

Hi. I'm a livestock producer from Manhattan, Kansas. And I just read in the Manhattan Mercury newspaper that all backers of the local site for NBAF had better ramp up and flood DHS hot line and mailbox with messages of endorsement.

They haven't hardly allowed us to print anything or the number. They've encouraged... they've said they're for this. I think that's why people stood up last week and started to complain because if you don't, all the people around here are considered for it if we don't stand up. We started late, we sent a petition in...in less than a week's time we got almost 800 people signing it. And people more wanting to do it and it's too late. The 60-day period is not enough. I'm tired of the local people scaring us and telling us that we can't stand up and we can't voice our opinions and letting us think that we're gonna be fired for it. That's just against free speech and I don't even know what...these people are afraid to even call in or write. So don't think that just because the high-and-mighty KSU college is supporting this and a few livestock associations – a lot of members when they heard that ... farm bureau president was for it are just on the verge of leaving. Cannot believe it – we do not want an infectious disease lab in Kansas or on the mainland. I don't even know how to tell you that there's people, the general people, are so against it.

Hope it makes a difference.

Thank you for listening.

1|4.0

2|25.4  
3|5.0

Comment No: 1                      Issue Code: 4.4

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

Comment No: 2                      Issue Code: 25.4

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

Comment No: 3                      Issue Code: 5.0

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

## Anonymous PD0284, Anonymous PD0284

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PD0284

August 24, 2008

Hello.

I'm a resident of Manhattan, Kansas and I wanted to express my opposition to placing the BSL Level-4 lab in Manhattan, Kansas.

1| 25.4 In reviewing the EIS, the Environmental Impact Statement, I do not believe that it  
2| 21.4 sufficiently outlines that it can be done safely here in Manhattan. One has to consider the  
tornado activity we have in the area, such as the recent F4 tornado, it's not been proven it  
can withstand a tornado of that degree.

3| 11.4 We also have an earthquake fault line outside of the city and I don't believe it's been  
proven that it can withstand an earthquake.

4| 5.0 I think it is very dangerous to have this type of lab on the mainland, and I'm very  
opposed to it, and want to express that opinion.

Thank you.

Comment No: 1                      Issue Code: 25.4

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 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.

Comment No: 3                      Issue Code: 11.4

DHS notes the commentor's concerns regarding earthquakes. Section 3.6.1 of the NBAF EIS describes the methodology used to assess each site's potential seismic consequences, and Section 3.6.4 specifically describes the Manhattan Campus Site. Section 3.6.4.1 discusses the Humboldt Fault system. The NBAF would be built to meet or exceed all applicable building codes for seismic safety. Section 3.14.3.2 further addresses NBAF design criteria and accident scenarios associated with natural phenomena events such as earthquakes.

Comment No: 4                      Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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 Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

**Anonymous PD0285, Anonymous PD0285**

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**PD0285**

August 25, 2008

1|5.0

I am a resident of Riverhead. I prefer not to give my name. I am not representing any organization, but I would like to say that I would be in favor of upgrading the Plum Island facility to a Level-4 security facility. I think it's important to have research done on all kinds of bio hazards and I am assuming that the security will assure our safety.

Thank you for giving me the opportunity to comment.

Comment No: 1                      Issue Code: 5.1

The NBAF EIS fully analyzes the Plum Island Site Alternative. The proposed NBAF requires BSL-4 capability to meet mission requirements (DHS and USDA). PIADC does not have BSL-4 laboratory or animal space, and the existing PIADC facilities are inadequate to support a BSL-4 laboratory. Upgrading the existing facilities to allow PIADC to meet the current mission would be more costly than building the NBAF on Plum Island, as discussed in Section 2.4.1 of the NBAF EIS.

## Anonymous PD0287, Anonymous PD0287

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PD0287

August 25, 2008

1| 25.4

2| 21.4

I am very much opposed to building an NBAF Level-4 at Kansas State University in Manhattan, Kansas. An accident would devastate the whole area. Remember to be human is to err. People run such places - not always perfect people. It's not like radiation. You can't use a monitor to trace it. Knowing a spill happened would be by finding the sick or dead animals - obviously that's a little too late.

Comment No: 1Issue Code: 25.4

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

Comment No: 2Issue Code: 21.4

DHS notes the commentor's concern regarding the potential for an accident based on human error. As described in Section 2.2.2.1 of the NBAF EIS, 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. Training and inherent biocontainment safeguards reduce the likelihood of a release. Text in Section 3.14 and Appendix E states that the specific objective of the hazard identification is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF.

Anonymous PD0293, Anonymous PD0293

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PD0293

August 25, 2008

1|25.4

No, no, no, no, no, no, on the NBAF. I don't think it's a wise choice for Kansas. It's too dangerous to be doing that testing here.

No, no, no, no, no, no, a hundred times no.

Comment No: 1

Issue Code: 25.4

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

## Anonymous PD0294, Anonymous PD0294

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PD0294

August 25, 2008

Hi.

1| 25.4 I'm calling from Wamego, Kansas within a few miles of the Manhattan, Kansas proposed site at Kansas State University. I'm strongly opposed to bringing the NBAF to Manhattan, Kansas for many reasons. Most especially, as I read the Executive Summary of the Draft Executive Summary statement on page ES12. When I read that the May 2008 modeling study said that with a potential release of just foot and mouth, one disease that would be studied there, there would be an economic loss estimated of 4.2 billion in Riley County, Kansas alone. Realistically, this would destroy the Kansas economy because our beef industry would be ended. No one internationally would buy our beef. This would extend up into Nebraska, Iowa, Missouri, Oklahoma, and Colorado at the very least.

2| 15.4

Recently we heard that Japan would not buy our beef because there was a lack of a certificate coming out of a western Kansas meat packing plant. No disease, just a certificate. A disease outbreak would be catastrophic to our economy and to the National meat industry, I believe.

1 cont.| 25.4 Our family firmly rejects the idea of locating the NBAF here, and most of our friends feel differently....feel the same way we do feel differently from that of our Governor who supports this. Most of our friends, especially those involved in agriculture, feel that this is not a safe place to place the NBAF.

3| 24.1 We firmly hope that DHS will select Plum Island. This is necessary research and we support the research being done wholeheartedly but we prefer that it be kept off the mainland for additional security that being surrounded by water provides.

We know there is no fail safe, but it does seem that every layer of security you can add is simple common sense.

1 cont.| 25.4 We wholeheartedly reject the idea of the NBAF coming to Manhattan, Kansas, and pray that it does not do so.

Thank you.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 15.4

Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. 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 economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Comment No: 3 Issue Code: 24.1

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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 Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

Anonymous PD0297, Anonymous PD0297

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PD0297

August 25, 2008

Hi.

1| 5.0 I just sort of learned about the NBAF. I don't see how anybody can justify putting  
2| 25.4 something like that on the mainland or in Manhattan, Kansas.

I just....it just scares me to death. I've read about hoof and mouth. That is so dangerous to our whole country. I just can't believe you're going to do it.

1 cont. | 5.0 My sister told me about it and I'm calling....I just....please, please, keep it on an island, or do it somewhere besides the United States and the mainland.

Thank you.

Comment No: 1                      Issue Code: 5.0

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

Comment No: 2                      Issue Code: 25.4

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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.

## Anonymous PD0299, Anonymous PD0299

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PD0299

August 25, 2008

Yes.

1| 25.4 | I'd like to leave my comments for the possibility of having the facility in Manhattan, Kansas, and I want to state that I am very much opposed to having it come to my community.

I have been related to farming for at least three generations and there's very few places left in the world where farming can take place because of growth, or population concerns, or people not wanting to be around some of the affects that farming has. And I think this is one area that needs to be protected for that reason.

2| 21.4 | I am very concerned about the possibility of things that could go wrong in the facility that could affect the animals and the agriculture population in this area, which is huge. And I very much want to state my concern for that and the fact that I think you need to know there are a lot of people that are against this, that just felt like they could not fight the big powers that be and the big voices from the officials of the state.

3| 24.1 | But, please know there are a lot of us that are very concerned about this and think that the best place is Plum Island, where it has been....where it's not close to anything else, but please not to Manhattan.

Thank you.

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 21.4

DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. 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, including external events such as a terrorist attack. 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. Oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

Comment No: 3                      Issue Code: 24.1

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

## Anonymous PD0300, Anonymous PD0300

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PD0300

August 25, 2008

Hi.

1| 21.4 I'm from Manhattan, Kansas and a lot of us didn't even realize what NBAF was until a  
 2| 21.4 tornado hit a portion of this town on June 11<sup>th</sup>. Part of the tornado was an F5. The  
 3| 15.4 controversy was about what if NBAF was here and an F5 or larger tornado hit it. We're  
 all...we're all worried about foot and mouth and all the pathogens that could accidentally  
 be let loose or intentionally. I don't want to be a target for terrorists. If the foot and  
 mouth ever got into the deer population, the whole United States economy would pretty  
 much come to a whoa for months or years.

4| 21.4 This is just so scary. There is a wildlife industry out there, too. There would be no way  
 of stopping it, if it got loose.

5| 5.0 An island seems to be the only place that could be semi-safe. If you have to build  
 something like that, please don't bring it out to the mid-west there amongst livestock or a  
 lot of people.

Please keep it in a safe island area.

Thank you very much.

Comment No: 1 Issue Code: 21.4

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.

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern regarding a potential terrorist attack on the NBAF. Section 3.14 addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) 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: 3 Issue Code: 15.4

Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. 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 economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was

determined to be disease-free."

Comment No: 4                      Issue Code: 21.4

The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Should the NBAF Record of Decision call for the design, construction, and operation of the NBAF then site-specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the NBAF. Section 3.8.9 of the NBAF EIS addresses existing and potentially applicable response plans that provide insight into some of the livestock and wildlife protective and mitigating measures that could be employed in the event of a pathogen release from the NBAF.

Comment No: 5                      Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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 Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

**Anonymous PD0304, Anonymous PD0304**

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**PD0304**

August 25, 2008

1|24.5

I am proud to be from Mississippi and would embrace an opportunity to locate a bio lab in our state. We have many bright and talented students in Mississippi as well as a great quality of life, and Mississippi definitely has a wonderful business-friendly atmosphere.

Thank you.

Comment No: 1

Issue Code: 24.5

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

Anonymous PD0305, Anonymous PD0305

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PD0305

August 25, 2008

Yes.

1|24.5

I was calling in....I am in support of the National Bio and Agro Defense Facility being built in Mississippi. I think it would really help our kids to be able to stay in Mississippi after they graduate from college. So, I would really love for Mississippi to be considered.

Thanks.

Comment No: 1

Issue Code: 24.5

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

## Anonymous PD0306, Anonymous PD0306

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PD0306

August 25, 2008

Yes.

1| 25.4 | I'm calling to voice an opinion and I do not think that there should be any NBAF located  
 2| 15.4 | in Kansas. This is a cattle rich environment. The Flint Hills are the only ones that raise  
 3| 5.0 | the grass of that kind and some of the very best grass in the world for raising cattle, and it  
 4| 24.1 | is completely stupid to give a chance to introduce disease in this area. It would  
 completely destroy the economic system here as well as destroy the lives of many, many  
 people, and I do not want this in our area of, Kansas, Manhattan, Kansas State. And I  
 also don't think that it should even be on the mainland. I think you need to keep it  
 somewhere away. Use Plum Island. Re-do it. We don't need it here.

Thank you.

Comment No: 1      Issue Code: 25.4

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

Comment No: 2      Issue Code: 15.4

Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. 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 economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free."

Comment No: 3      Issue Code: 5.0

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on risks to livestock. 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: 4      Issue Code: 24.1

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

## Anonymous PD0310, Anonymous PD0310

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PD0310

August 25, 2008

Hi.

1| 25.4

I'm from the Manhattan area. I just learned about the NBAF. I didn't know what it meant before. A lot of people don't know what it means. We are very much against it being here in Manhattan. I think it would ruin Kansas' economy if a slip-up happened. I am afraid....I have friends that told me about the hoof and mouth thing. That's just too scary to bring to the states, I think.

2| 21.4

We're trying to....I'm trying to tell friends. We need to get the word out. Nobody knew what NBAF meant. Hopefully, hopefully we can help get the word out so people can stand up against this. We're just afraid some accident's going to happen.

Thank you.

Good bye.

Comment No: 1Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative. The evaluation of an accidental release of foot and mouth disease virus is presented in Section 3.10.9 and Appendix D of the NBAF EIS and includes national-scale economic consequences as well as local economic consequences.

Comment No: 2Issue Code: 21.4

DHS notes the commentor's concern regarding an accident. Text in Section 3.14, states that the specific objective of the hazard identification is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF.

## Anonymous PD0311, Anonymous PD0311

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PD0311

August 25, 2008

Hi.

1| 25.3 | I'm a resident in North Carolina, near (inaudible) and I am opposed to the facility being located here. I have a PhD in molecular biology and so I do understand the way the technology works, and I know that its possible that it can be done...lots of things can be done safely, but with this particular type of work, I think there is a risk of agents not being completely controlled, and not being worked, just because of the nature of having people go in and out. And so, I don't think that this is a good use of our resources. We have plenty of other ways to generate jobs in this field without getting into the warfare aspect.

2| 21.3 |

So, thanks very much for hearing my comments.

Bye.

Comment No: 1                      Issue Code: 25.3

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

Comment No: 2                      Issue Code: 21.3

DHS notes the commentor's concern regarding safety protocols. Text in Section 3.14 of the NBAF EIS states that the specific objective of the hazard identification is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. %Appendix B to the NBAF EIS describes biocontainment lapses and laboratory acquired infections in the United States and world-wide. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF.

DHS also notes commentor's concern that NBAF may be involved in warfare research. Chapter 1, Section 1.1 of the NBAF EIS clearly identifies NBAF's mission as defensive which would preclude involvement in 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 and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies.

## Anonymous PD0312, Anonymous PD0312

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PD0312

August 25, 2008

Hi.

1| 4.0 Thank you for giving us equal time. I just wish we had more than 60 days...didn't find out about it in time to really get on the stick and let people know.

Local newspapers, K State, KSU, are all for it. They kind of brought it under the radar. Any comments we make to the paper are usually butchered up and made to look stupid. They've minimized any risk about this. I'm a livestock producer, it worries me to death. The meetings were held at K-State Union, which the whole parking lot was tore up, and a huge crane was out there. In order to get to there, you had to take a shuttle bus. Well, the farmers and ranchers just didn't have the time to mess around.

2| 4.0 I went, and there was maybe 30 people, professors, and pharmaceutical people, all signed up in front of me. I was there an hour and ten minutes early. We didn't start until an hour or so late, waiting for Governor Sebelius, so a lot of people that wanted to talk, could not talk.

3| 5.0 I had to work at night. Several people that I know that wanted to talk had to work at  
4| 25.4 night, so we couldn't come back for it. It's just been kind of railroaded through. I think it's going to ruin the Nation if it gets put in the mainland. It needs to be kept on an island. It needs to be kept safe. I can't imagine any government officials coming up with this and wanting to put it here. Please don't.

3 cont.| 5.0 This scares me to death. I know there's a need for this, but it's got to be on an island or someplace. England had the big scare, and they're still recovering from it. A couple other countries are now going to put their stuff on islands. Please take note of that, and please, please don't endanger our U.S. citizens.

Thank you very much.

Comment No: 1 Issue Code: 4.0

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

Comment No: 2 Issue Code: 4.4

DHS notes the commentor's opinions regarding the Manhattan public meetings but disagrees with the characterization that the meetings prevented interested persons from speaking. Regarding the afternoon session, DHS contends that the meeting started on time and speakers were called to make their formal comments in the order that they registered to speak. When Governor Sebelius' turn came to speak and she was not present, she was skipped and the next name was called. When the Governor did arrive, she was inserted into the speaking rotation as a courtesy. Afterwards, the formal comment period continued. All persons wishing to speak were afforded the opportunity to do so both at the afternoon session as well as at the evening session. DHS does recognize that it is not possible to hold a public hearing at a time and place that is convenient to every interested person, and therefore provides alternate means of submitting comments to provide multiple opportunities to participate in the NEPA process. In addition to oral comment at the public meetings, DHS also accepted comments submitted by mail, toll-free telephone and fax lines, and online through the NBAF Web page (<http://www.dhs.gov/nbaf>). All comments, both oral and written, received during the comment period were given equal consideration and have been responded to in this NBAF Final EIS.

Comment No: 3 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives, in particular, the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on safety concerns. 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 Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

Comment No: 4 Issue Code: 25.4

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

Anonymous PD0316, Anonymous PD0316

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PD0316

August 25, 2008

Yes.

1|25.4 | I just want to vote against having NBAF in Manhattan, Kansas. I just think it's very wrong.

Thank you.

Comment No: 1

Issue Code: 25.4

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