

Anonymous PD0317, Anonymous PD0317

Page 1 of 1

PD0317

August 25, 2008

1|25.4 | I would like to comment on the NBAF, in that I would not want to have it at all in Kansas. I don't think it is safe.

| So, I'm definitely opposed to having it in Manhattan.

Thank you.

Comment No: 1

Issue Code: 25.4

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

Anonymous PD0319, Anonymous PD0319

Page 1 of 1

PD0319

August 25, 2008

Hi.

Some of us didn't know this NBAF was coming to Manhattan. The newspapers and everything's kept it kind of quiet. We didn't really have a choice of responding to it.

After the July 31st meeting we read in all the papers you know, all the K-State people were for it and how there was no opposition, or very little. Well, there's a bunch of people that are opposed to it, that didn't know they could speak out. And we tried to get the number out to them, and it was just amazing how many people do not want it here in Manhattan, Kansas, or any place in the United States because of the danger.

1| 25.4

2| 4.0

3| 21.4

4| 15.4

We wish there was a longer period to protest it, or even put it up to vote. We're trying to get the word out. I'm just terrified of human error, and ruining our livestock industry and economy in this area, or any place. Even Texas is too close. It would just take a few hours to get hoof and mouth here.

Thank you very much.

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: 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: 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. 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: 4 Issue Code: 15.4

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. DHS also notes the commentor's concern about siting NBAF at the Texas Research Park Site Alternative.

Anonymous PD0327, Anonymous PD0327

Page 1 of 1

PD0327

August 25, 2008

Yes.

1) 25.4 I'm a resident of ██████████ Kansas and I'm opposed to NBAF in Kansas. DHS has not
 2) 5.0 conducted any studies to determine whether FMD work can be done safely on the
 3) 21.4 mainland. And FMD escaped from the Pirbright facility in a farming community in
 England highlights the risks of a release from a laboratory that is in close proximity to the
 susceptible animals and provides the best evidence in favor of an island NBAF location.

So, please consider this in your choice of location for NBAF.

Thank you very much.

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, 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. Section 3.14 of the NBAF EIS evaluates the risks of studying FMD at all of the site alternatives, including the mainland sites. The evaluation of an accidental release of foot and mouth disease virus is presented in Section 3.10.9 and Appendix D and includes national-scale economic consequences as well as local economic consequences.

Comment No: 3 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 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. Section 3.8.9 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 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.

Anonymous PD0328, Anonymous PD0328

Page 1 of 1

PD0328

August 25, 2008

Hi.

1|25.4

I am against the placement of the NBAF in Manhattan, Kansas, at its proposed location. I feel the proposed location is too close to Kansas State University, and the students and faculty, and community members who live and work in the area. It's also too close to the hospital and Bramlage Coliseum and Kansas State University stadium.

If it was built farther away from the community, I would have more support for that. But I think having it in the middle of our city makes it undesirable.

Thank you.

Comment No: 1

Issue Code: 25.4

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

Anonymous PD0329, Anonymous PD0329

Page 1 of 1

PD0329

August 25, 2008

Yes.

1|25.2 | I live in [REDACTED] Georgia, [REDACTED] and I do not want the bio hazard lab here.
Thanks.

Comment No: 1

Issue Code: 25.2

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

Anonymous PD0332, Anonymous PD0332

Page 1 of 1

PD0332

August 25, 2008

1) 25.4 I am a resident of ██████████ Kansas. I am calling to say that I am opposed to locating NBAF in Manhattan for the following reasons:

- 2) 21.4 1) We are in the middle of tornado alley.
 3) 19.4 2) The study of diseases that can be transmitted to humans for which there is no cure.
 4) 15.4 3) The study of diseases that could devastate the Kansas economy by decimating its very large cattle population, and
 5) 21.4 4) There were several Fall 2000 newspaper articles that indicated that there have been numerous safety problems at current Level-3 and Level-4 labs.

6) 24.1 I feel that such a lab belongs on Plum Island and not on the mainland and in particular,
 7) 5.0 not 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: 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: 19.4

DHS notes the commentor's concerns regarding human health and safety. 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. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. 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. 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 populations residing within the local area. 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.

Comment No: 4 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: 5 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. As examined in Section 3.14 and Appendix E of the NBAF EIS, the risk of an accidental release of a pathogen is extremely low. DHS is aware of the historic biosafety lapses and will consider these events to improve the structural and engineered safety of the final NBAF design and to incorporate lessons learned from incidents of human error into the operating procedures. Appendix B of the NBAF 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 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 emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 6 Issue Code: 24.1

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

Comment No: 7 Issue Code: 5.0

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

Anonymous PD0333, Anonymous PD0333

Page 1 of 1

PD0333

August 25, 2008

1|25.4 | I'm a farmer and a rancher, and I just want to express my opposition to putting NBAF in the State of Kansas. We don't need to bring FMD into the State of Kansas. It should never be brought here, right here in the middle of cattle country.

Any farmer that's for this, I think has really not thought this through.

Thank you very much.

Good bye.

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.

Anonymous PD0334, Anonymous PD0334

Page 1 of 1

PD0334

August 25, 2008

1|24.4 | I support NBAF in Kansas.

Comment No: 1

Issue Code: 24.4

DHS notes the commenter's support for the Manhattan Campus Site Alternative.

Anonymous PD0335, Anonymous PD0335

Page 1 of 1

PD0335

August 25, 2008

Yeah,

1| 21.4 | I have a Masters in Agricultural Education. We're up on a farm and I'm extremely concerned about the hazards that could happen. We've seen from the past, other entities and like this, that diseases did get out. With Manhattan here we have a sale barn that ships cattle all the way from Nebraska to Texas which could infect a large area being it is in the middle of the cattle belt.

2| 15.4 | I am extremely concerned about the possibility of diseases paralyzing the State of Kansas, not only our local economy.

3| 24.1 | I am totally against it. I think it needs to stay where it's at in Paris Island where we have another...more insulation away from the livestock industry, and it'd be safer there than probably any other area.

Thank you.

Comment No: 1 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. 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 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 emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 2 Issue Code: 15.4

DHS notes the commentor's concern about the economic consequences of an accidental release. 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 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 PD0337, Anonymous PD0337

Page 1 of 1

PD0337

August 25, 2008

1| 25.4 | No NBAF in Manhattan, Kansas. We do not want to destroy our precious town with this bio lab. We do not want it in the middle of our farming and ranching community. Keep our ranching community safe.

2| 24.1 | Please keep it on Plum Island, but no NBAF in Manhattan, Kansas.

Thank you.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site 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: 2 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 PD0338, Anonymous PD0338

Page 1 of 1

PD0338

August 25, 2008

1| 25.4 I'm calling in regard to the relocating of NBAF in Manhattan, Kansas. I am opposed to relocating it in Manhattan, Kansas.

2| 8.4 I am a property owner. I own property between where the site would be and the [REDACTED], and numerous times I've had sewer backups into basements of my property from the city sewer line. And I think there's a possibility that something could be....could backup into my house that came out of this site. And I am terrified that some of these pathogens, maybe not being treated, coming back through the sewer into my house. And I definitely do not want that. And you see sewer trucks all over town...it seems like the city does not have a very good sewer system here at Manhattan. They're always cleaning something out somewhere and I think that DHS needs to investigate that a little bit to see if the City of Manhattan sewer system can handle it or not.

Thanks.

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: 8.4

DHS notes the commentor's concern regarding the capacity of the Manhattan Sewage System. Section 3.3.4 of the NBAF EIS addresses both the current sewage system capacity and infrastructure and the sewage system improvements required to handle NBAF discharges. The NBAF would be designed and operated as necessary to prevent negative impact to the Manhattan sewage treatment capabilities resulting from flow rate or potentially harmful wastewater constituents. Specifically, as summarized in Section 3.15 of the NBAF EIS, pre-treatment of liquid waste streams would be implemented as necessary to meet treatment facility acceptance criteria, therefore avoiding potential impacts.

Anonymous PD0339, Anonymous PD0339

Page 1 of 1

PD0339

August 25, 2008

1|25.4

I'm calling for...behalf of no NBAF in Kansas. If Manhattan, Kansas is selected for NBAF, then we will consider legal action. Our attorneys are ready.

Thank you.

Comment No: 1

Issue Code: 25.4

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

Anonymous PD0340, Anonymous PD0340

Page 1 of 2

PD0340

August 25, 2008

Hello,

I'd like to leave a comment regarding the NBAF siting, and I think...I wanted to say that the site in Georgia, which I'm very familiar with since I live [REDACTED] is a horrible location, being right by a river and surrounded by agricultural areas, and woodlands where there's a very hot and heavy population of deer, raccoons, and foxes, and coyotes, etc., not to mention squirrels and chipmunks and birds of all types, and it overlooks a small river filled with fish. So, this is just a terrible site for those reasons.

1| 25.2

Also, it's a terrible site considering that the population, the local population, knows very little about what's actually going to be going on there. There hasn't been suitable media coverage. But at every meeting that I've attended, every speaker against this with a couple of exceptions, have not been part of an organization, but just like me, a private citizen very concerned and opposed to the location and siting of the laboratory there in Clarke County, Georgia.

On the other hand, the proponents at all these meetings have been either university officials or scientists who hope to have some direct involvement in the laboratory, or business interest which also expect and hope to have some involvement and relationship with such a lab. So, the citizens are against it. The big guys....a lot of them want it but only the ones who are directly expecting to benefit from it..

2| 5.0

It would be much better sited at a more isolated location in a climate that's not so humid and biologically diverse and dense. Such a site might be the Texas location. That's also closer to Mexico where a lot of tropical diseases are going to be on the march, coming northward, especially as the climate warms.

The Kansas site might be better. The Mississippi site....they're very, very, poor in Mississippi, and they probably would....the population would probably be more welcoming to something like this. But the Athens site....there's just a strong public and civic opposition to this. Anyone who at least has read the documents and become familiar with it,all the people who don't stand to directly benefit from it, are opposed to it. Everyone I've spoken to. And of course, I am strongly opposed because of environmental reasons and economic reasons. I don't see any benefit to Clarke County, which is a very poor county, and I see a lot of infrastructure needs. These are glossed over in the EIS. The infrastructure needs and the risks of environmental impact. All of that....or environmental damage and escape of disease and pathogens....all of this seems to be glossed over in the EIS.

3| 15.2

4| 21.2

The risk is very significant and especially so when you're close to large population centers and surrounded by....like Atlanta or Raleigh in the case of...Raleigh, Durham area in North Carolina. These two are the worst of the sites and the Mississippi site

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden or IBA. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with the IBA. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high-value forested riparian corridor would be preserved; and therefore, the NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and the IBA. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Birds are not susceptible to diseases that are currently designated to be studied at the NBAF. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF. Furthermore, the purpose of the NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's preference for a more isolated location with a climate that is not humid. 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.

DHS also notes the commentor's preference for the Texas Research Park Site.

Comment No: 3 Issue Code: 15.2

DHS notes the commentor's concerns. Funding for the design, construction, and operations for the NBAF will come from the Federal government. Proposals for offsets to the site infrastructure (part of the construction costs) were requested by the Federal government. The decision as to what to offer (land donation, funding, other assets) is solely at the discretion of the consortium and state and local officials as part of the consortium bid site package. The amount of funding and how the funding is paid for (bonds, taxes, etc) is determined by the state and local government officials and not the

decision of the Federal government. While the potential costs of proposed actions are not a factor in the environmental impact analysis presented in the NBAF EIS, cost information and the scope of the cost analysis performed is summarized in Section 2.5 of the NBAF EIS to provide pertinent information to the DHS Under Secretary for Science and Technology so that he may make a more informed decision with respect to the alternatives presented in the NBAF EIS.

Comment No: 4

Issue Code: 21.2

The NBAF would provide state-of-the-art biocontainment features and operating procedures to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Sections 3.8.9, 3.10.9, and 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from an accidental or deliberate pathogen release. 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 emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Anonymous PD0340, Anonymous PD0340

Page 2 of 2

PD0340

shares some of those problems being also warm and humid like Athens...like Georgia and North Carolina.

2 cont.| 5.0

The Texas site is drier, probably less of a risk, it's also closer to Mexico where it will be more practical and it has infrastructure in place that it would be beneficial.

The Kansas site has...Georgia and North Carolina have opposition. Kansas has some, but I understand Texas and Mississippi have very little. So, I hope you'll consider Texas the best alternative of all these sites.

2 cont.| 5.0

It would, in the best possible world, be great to site it out in the middle of the ocean somewhere, but there may be a lot of reasons why that isn't practical. But siting it in Athens, Georgia would just be a horrible, horrible thing. So, I hope you'll take that into consideration and put it as far....farther away from population centers and in a drier climate.

1 cont.| 25.2

Thank you very much.

Bye.

Anonymous PD0342, Anonymous PD0342

Page 1 of 1

PD0342

August 25, 2008

Yes,

1| 25.4

I'm a resident of ██████████ Kansas and I wanted to let you guys know that I am highly against the NBAF facility here in Manhattan.

I think it would be detrimental to not only the cattle and ranch industry, but also to our precious town, Manhattan.

I'm highly against this. Please do not put this in our town.

Thank you.

Bye.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative based on risks to livestock and Manhattan. 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 PD0343, Anonymous PD0343

Page 1 of 1

PD0343

August 25, 2008

Hello.

I left a message before, but I wanted to share this further comment that I remember at one of the meetings a couple of people spoke out about the likelihood of participating in civil disobedience, and I think that's not terribly likely initially, but I do think that given the attitude of the citizenry, general disposition of them toward Federal Government, that such a thing is likely to occur with greater frequency not less frequency as long as such a laboratory is present in a place like that.

1|2.0

Unfortunately, there is a general distrust of government bureaucracies and my feeling of course, is that everybody involved has the best of intentions. But things do happen, accidents happen and people sometimes cover up mistakes they've made and hide facts and (inaudible). I worry that at some point the most horrible eventuality....the most horrible events could be a eventuality, either through terrorism, local homegrown, or foreign. It could be just a rogue scientist like we had in the Dr. Ivan's case, or it could be a natural disaster.

2|21.2

The site is terrible for all of these reasons and being situated up on a hilltop as it is, would be prone to tornados and would be an easy target. And I think a lot of people are concerned that it would make Athens, Clarke County, a target for terrorism, which presently it's not.

3|5.0

And so, siting it in a more remote location and in a drier climate as I said before, and in a place where there's less opposition to the siting of the NBAF would be a really good idea.

4|25.2

And I hope that it is successful in it's mission, but needs to be far, far, far, away from Athens, Georgia.

Thank you very much.

Bye.

Comment No: 1 Issue Code: 2.0

DHS notes the commentor's belief that there is a general distrust of government.

Comment No: 2 Issue Code: 21.2

DHS notes the commentor's concerns regarding an accident. 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. Chapter 3 Sections 3.4 and 3.14.3.2 of the NBAF EIS address NBAF design criteria and accident scenarios associated with weather-related events such as tornadoes, respectively. Section 3.14 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. 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.

DHS notes the commentor's concern that the NBAF would be a prime terrorist target. Section 3.14 and Appendix E 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.

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

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: 5.0

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative. DHS held a competitive process to select potential sites for the proposed NBAF as described in DEIS Section 2.3.1. A multi-disciplinary team of engineers, scientists, lawyers, academics and communicators from the departments of Homeland Security, Agriculture, Health and Human Services, and Defense reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the EIS as alternatives for the proposed NBAF. 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: 4 Issue Code: 25.2

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

Anonymous PD0344, Anonymous PD0344

Page 1 of 1

PD0344

August 25, 2008

Yes,

1|25.4 | I'm a rancher in ██████████ Kansas and I oppose the NBAF in
Manhattan.

Comment No: 1

Issue Code: 25.4

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

Anonymous PD0357, Anonymous PD0357

Page 1 of 1

PD0357

August 25, 2008

Hello.

1| 25.2 I am totally against NBAF being in Athens, Georgia. I'm praying to God that it does not happen.

2| 15.0 Please don't put it here. We don't want it. The majority of the people don't want it.
 3| 5.0 This is a bad place for it – a highly populated area. It's in the southeast so there are less regulations. I'm sure that's why most of the sites are in the southeast that they're trying to pick. But they should have it somewhere more isolated like where it is right now.

4| 2.0 They say it's going to cost more to expand it there than to build a new one somewhere else. Well then, build the new one there, then you'll have the old thing for some things
 5| 24.1 and then you'll have the brand new one there too, or whatever. But please, don't have it here. We don't want it and we don't need it. It's extremely dangerous and I don't
 1 cont. | 25.2 believe that they're going to just do what they say they're going to do at it, which is bad enough already.

Alright, thank you very much.

Please be progressive and view it in a safe way, in a safe place.

Thank you.

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 15.0

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

Comment No: 3 Issue Code: 5.0

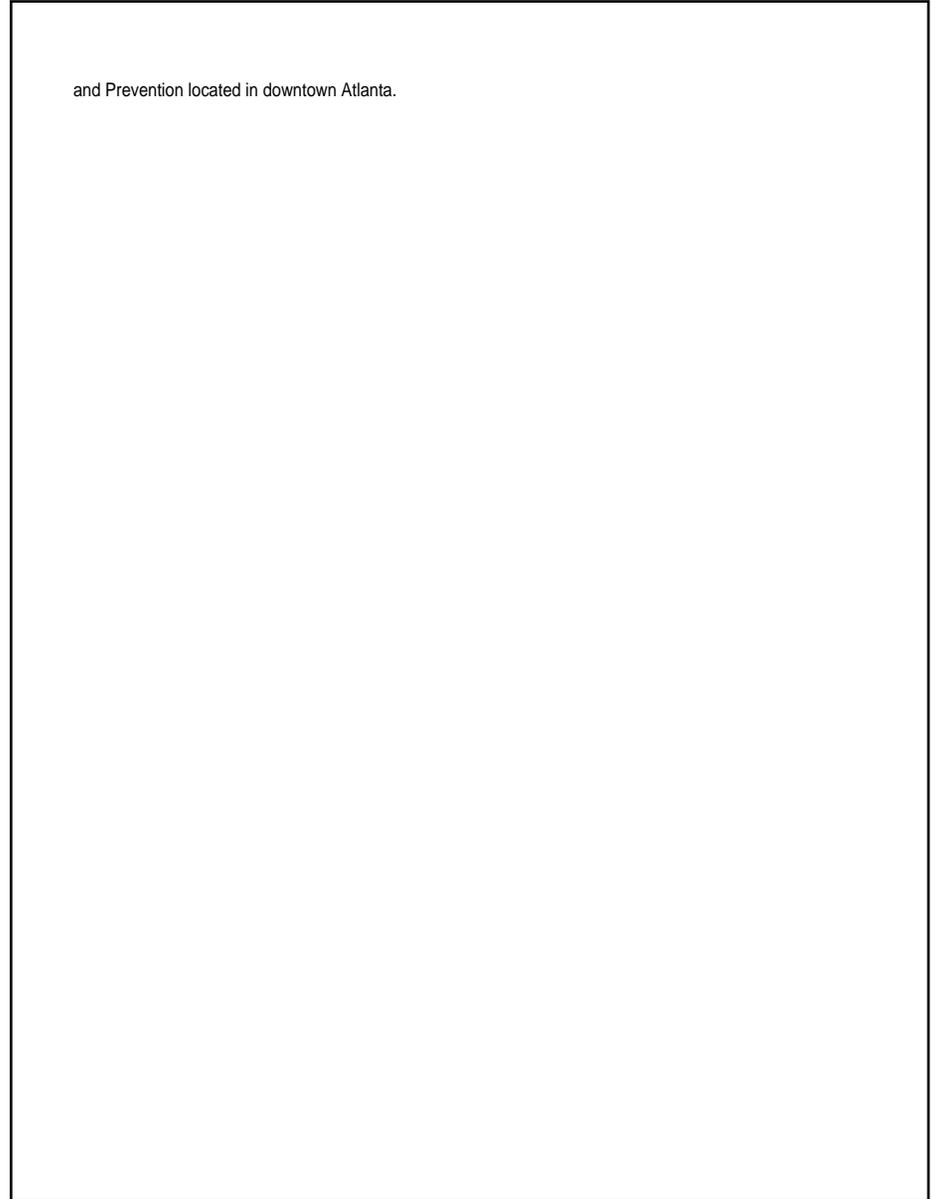
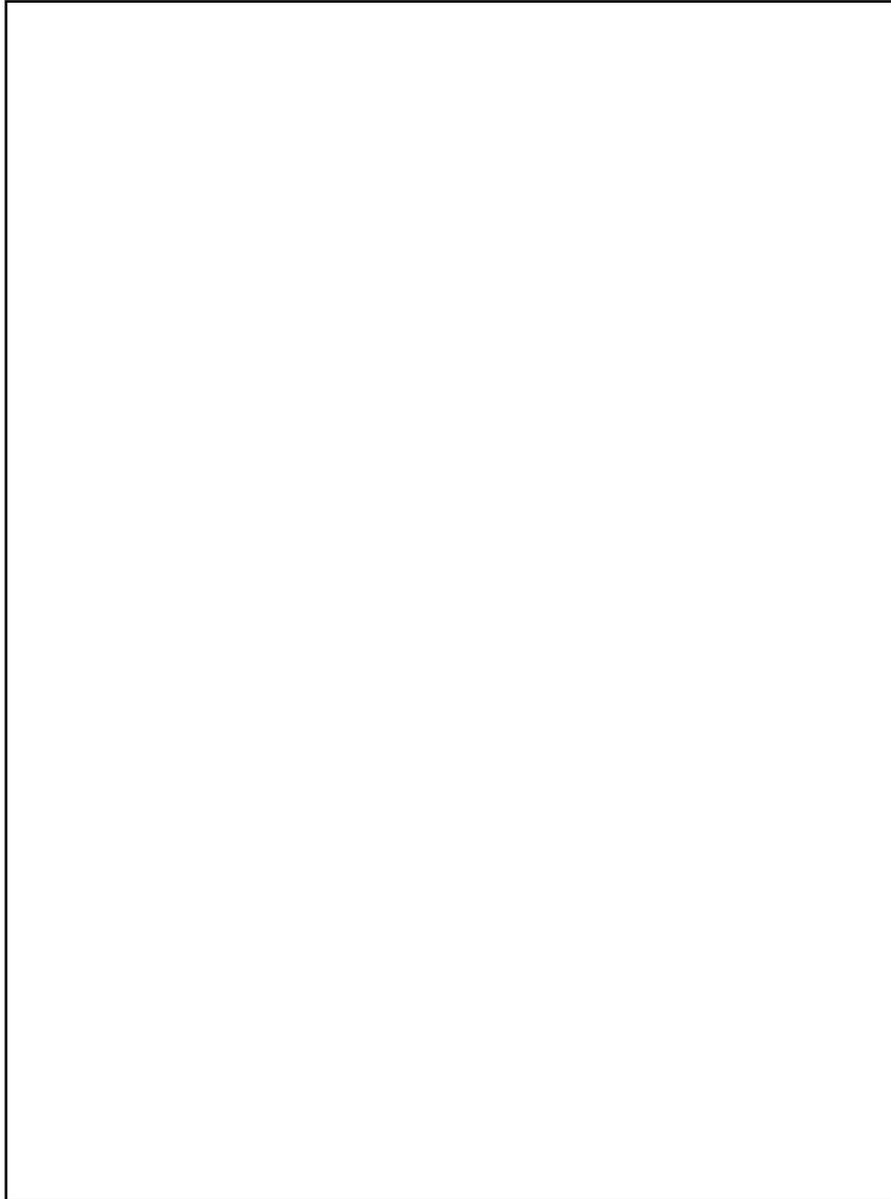
DHS notes the commentor's concern about siting NBAF in the southeast U.S. and preference for an isolated site such as the Plum Island Site Alternative. As described in Section 2.3.1 of the NBAF EIS, DHS's site selection criteria included, but were not limited to, such factors as proximity to research capabilities and workforce. The four evaluation criteria discussed in Section 2.3.1 will be among those factors considered in the decision of whether or not the NBAF is built, and, if so, where.

Comment No: 4 Issue Code: 2.0

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. As the commentor suggests, one of the alternatives analyzed in the NBAF EIS is to build the NBAF on Plum Island that is already conducting foreign animal research. It is possible, as the comment also suggests, that the current facility could provide additional research services in the future.

Comment No: 5 Issue Code: 24.1

DHS notes the commentor's opposition to the South Milledge Avenue 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 Athens. An example is the Centers for Disease Control



Anonymous PD0358, Anonymous PD0358

Page 1 of 1

PD0358

August 25, 2008

Hi.

- 1) 25.2 I'm in █████ Georgia and I do not think this is a good location for this facility for a couple reasons. One is....well, this is highly densely populated. Second of all, there are...through the university, there are so many internationals that it would be more difficult to identify if an international was involved in a terrorist attack.
- 2) 15.2
- 3) 21.2
- 4) 5.0 I think it would be a great kind of facility in an area where it's more rural and where there are fewer contacts from....people from other countries.

Thank you.

Good bye.

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 15.2

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

Comment No: 3 Issue Code: 21.2

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: 4 Issue Code: 5.0

DHS notes the commentor's concerns. Please refer to the response to Comment No. 2.

Anonymous PD0359, Anonymous PD0359

Page 1 of 1

PD0359

August 25, 2008

Hello.

1| 25.4 I am a [REDACTED] Kansas resident and would like to leave word that I am opposed to
2| 21.4 having NBAF land here for several reasons. One being that I am a resident, a lifetime
resident, of Kansas, and I'm worried about the security issues. I'm raising my children
here, and also have my business here and I'm concerned about security issues.

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 for security of the NBAF. Regardless of location, the NBAF would have the levels of protection and control required by applicable DHS security directives. A Threat and Risk Assessment (designated as For Official Use Only) was prepared that evaluated site-specific security issues and will be considered in the decision making process on whether or not the NBAF is built, and, if so, where.

Anonymous PD0360, Anonymous PD0360

Page 1 of 1

PD0360

August 25, 2008

Hello.

1| 25.4 I'm calling to say that I live in Kansas and used to live in New York and I do believe that the benefits of moving the NBAF to Kansas will probably be way, way less and not justify the risks and the disadvantages.

I think moving the NBAF to Kansas is not a good idea, and I'd like to go on record as being against it.

I'm calling as a private citizen. There are two of us in the family and we both believe the same way.

Thanks.

Comment No: 1

Issue Code: 25.4

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

Anonymous PD0362, Anonymous PD0362

Page 1 of 1

PD0362

August 25, 2008

Hi.

1| 25.0 Some of us just started a couple of weeks ago to protest this NBAF. Mainly because it appeared in the papers that no one was against it in the Manhattan area. There's thousands of people that don't even know about it. It's just been publicized what the true meaning of what it was, here in the last few weeks, and we are against it. We're cattlemen.

There's a little piece in the paper tonight from Tom Manney, Professor Emeritus of Physics and Biology at KSU. The report in our public information meeting was not representative of high quality journalism I expect from the *Manhattan Mercury*. The attempt to discredit a well-meaning sincere group of concerned citizens by misrepresenting even the simplest of facts smacks of yellow journalism. It makes the effort to bring the NBAF to Manhattan even more questionable because the public will not be able to count on investigative reporting from the local newspaper that might be needed to ensure safety should Manhattan be chosen as the site."

2| 25.4 The *Manhattan Mercury* is the main paper that people take and look at online and it has been for it and has been so bias we can hardly even get an article in, of anything and it's brought it under the radar. We've just been snuck up on by this. Nobody knew what NBAF stood for even spouting off its real name. They... some of them thought it was....or all of us thought it was just another factory or K-State job thing. We didn't know it was going to be studying terrific....horrific diseases. It's scaring us to death and we don't want it here in the mid-west.

3| 19.0 What kind of insurance will we be offered if we get sickened by some disease they let go other than hoof and mouth?

4| 15.0 A lot of people don't have insurance and so all their livestock and kids and animals and people and stuff get sick, then it's just tough luck. Is that the way the Government's going to treat us?

Seems like whoever's in charge around here bringing it in is trying to bring it in swift and hard and deter any, any opposition.

There're so many people that are afraid, even professors that are afraid, that have donated money to get an NBAF against...a group started, a *No NBAF* in Kansas started. But they will not speak up. They will not sign a petition because they are afraid for their jobs, down to the typists, the janitors, anybody working for Manhattan City. They're all afraid to speak out and so many of them don't even know what's going on. And for...for the public and...I don't know...the media to say that we're all for it, that is just ludicrous.

Many, many of us are against it and many more if they'd find out what it really meant.

Thank you.

Good by.

Comment No: 1 Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF. 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, tollfree 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.

Comment No: 2 Issue Code: 25.4

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

Comment No: 3 Issue Code: 19.0

DHS notes the commentor's concern about apportionment of financial liability for medical treatment in the event of a pathogen release. However, it is not possible to determine in advance who might be responsible for an incident. DHS will follow applicable local, state, and federal law, whether in asserting or defending against a claim for damages should a pathogen be released from the NBAF.

Comment No: 4 Issue Code: 15.0

DHS notes the commentor's concerns regarding an accident. 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. 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 would be developed, in coordination with local emergency response agencies, that would address special consideration populations residing within the local area. The issue of restitution is beyond the scope of this EIS.

Please refer to response to Comment No. 4 regarding financial liability concerns.

Anonymous PD0366, Anonymous PD0366

Page 1 of 1

PD0366

August 25, 2008

Yes.

1|25.4 | We do not want it. If it's in Nebras...or Kansas, it won't be long and it will be in
| Nebraska.

| We do not want any part of it.

Comment No: 1

Issue Code: 25.4

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

Anonymous PD0367, Anonymous PD0367

Page 1 of 1

PD0367

August 25, 2008

1| 25.4 | I'm a cattleman in Kansas and I strongly oppose bringing NBAF to Kansas and studying foot and mouth disease in Kansas.

2| 21.0 | Given the prior release of the other research facilities (the Plum Island, England, and around the world), release of FMD is a real possibility, and it's not something we need in Kansas, in the heart of cattle country.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 21.0

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

Anonymous PD0368, Anonymous PD0368

Page 1 of 1

PD0368

August 25, 2008

1| 25.4 I am a resident of ██████████ Kansas and I believe that the NBAF should not be located here. Your first priority should be to protect the lives and livelihoods of all Americans, and locating the NBAF here in tornado country and in the center of the livestock producing area, just doesn't make sense.

Please do what you are commissioned to do and keep our homeland safe. In other words, I vote No to having NBAF in Manhattan.

Thank you.

Comment No: 1 Issue Code: 25.4

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

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.

Anonymous PD0373, Anonymous PD0373

Page 1 of 1

PD0373

August 25, 2008

Hello.

1) 25.4 I live in ██████████ Kansas and I want to express my opposition to a BSL Level 4 lab being placed in Manhattan, Kansas.

2) 23.0 One of my concerns with the environmental impact statement is that it doesn't really address adequately, the level of security to be required by the employees, specifically research scientists. And I think this is of grave concern considering what has happened with the anthrax mailings and finding out that it was, you know, scientists that worked from within the lab. So I am very concerned that there is not enough security for the site.

3) 21.0 And, as far as you know, will there be armed guards at the doors and what kind of security do the employees need to go through?

2 cont. | 23.0

Thank you for your consideration.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 23.0

DHS notes the commentor's concern regarding a malicious and criminal act perpetrated by a NBAF employee. Section 3.14 addresses accident scenarios, including internal and external events, such as, an "insider" criminal act and 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.

Comment No: 3 Issue Code: 21.0

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