

Campaign 01

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CD0100

From: George Lambert [REDACTED]
Sent: Monday, July 14, 2008 12:20 PM
To: NBAFProgramManager
Subject: relocating the Plumb Island Animal Disease Center to a location on the mainland United States...

Dear Homeland Security Secretary Chertoff,

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

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

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

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

Comment No: 1 Issue Code: 24.1

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

Comment No: 2 Issue Code: 25.0

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

Comment No: 3 Issue Code: 5.0

See response to Comment No: 2.

Comment No: 4 Issue Code: 15.0

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

Comment No: 5 Issue Code: 21.0

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

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Recently Great Britain experienced two outbreaks of FMD that have been attributed to a release from bio-research facilities working with FMD. A 2001 outbreak caused at least \$16 billion in damages, devastated the rural economy, and nearly caused the government to fall. The experiences in Great Britain lead the National Grange to conclude that conducting federal research on dangerous animal diseases on the U.S. mainland is a risk we do not have to take.

5 cont. | 21.0

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

1 cont. | 24.1

I believe that geographic isolation at the Plumb Island Research facility remains a prudent, cost effective means of adding additional security to the facility and the vicinity. I also strongly believe that the selection process for a research facility of this nature has under appreciated the need for geographic isolation of a facility like this as a prudent, reasonable, and cost effective security measure that will assure our nation a world class bio- and agro research facility and the assurance that this facility will not pose accidental or incidental risk to rural communities in which potentially tens of thousands of family farmers and ranchers live. Thank you.

Sincerely,
George Lambert Antrim Grange #98



Campaign 02

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CD0200

Petition

1 | 25.3

The undersigned people request that the Butner Town Council withdraw their support of the proposed NBAF and communicate same in writing to the Department of Homeland Security within 60 days of the presentation of this completed petition.

Name Address *****

- Samantha Dunn N.C.
Jordan Earp NC
Clewskind Botte
Steven Johnson N.C
Dashawn Creek N.C
Chelsea Lee Nc
Beandi Creamer NC
Daryl Cromartie
David Dejesus 1567 NC
Uralde Cajal Hernandez NC
Francis... NC
John... dl

Comment No: 1 Issue Code: 25.3
DHS notes the petitioners's opposition to the Umstead Research Farm Site Alternative.

Campaign 04

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CD0400

From: info@athensfaq.org on behalf of Allison M. Beckum [REDACTED]
Sent: Friday, August 01, 2008 1:02 PM
To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 25.2 | We are strongly opposed to having NBAF in our community of Athens, GA. The DEIS
discloses an "insectary" where disease-spreading mosquitoes and other "vectors" will be
bred. It also discloses that any release of pathogen, because of our warm, humid climate,
2| 21.2 | could cause the disease to become permanently established in our community.

How would DHS respond to a release of mosquitoes and other vectors? The EIS needs to
show a detailed plan. Sincerely, (Your Name)

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 21.2

DHS notes the commentor's concerns regarding an NBAF accident that results in a release of a vector. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g., Rift Valley fever virus) becoming established in native mosquito populations, particularly in warm, humid climates, was evaluated in Sections 3.8.9, 3.10.9, and 3.14 of the NBAF EIS.

Campaign 05

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CD0500

From: info@athensfaq.org on behalf of Grady Thrasher [REDACTED]
Sent: Friday, August 01, 2008 3:56 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1| 13.2 | The DEIS seems to gloss over the effect of NBAF on the environment of the State Botanical Garden and Important Bird Area in Athens, GA.
- 2| 15.2 | Will the Final EIS correct this deficiency? Is the quality of life of Athenians not important to the DHS?
- 3| 25.0 | I am strongly opposed to NBAF.
- Sincerely,

Comment No: 1 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the Botanical Garden and the Important Bird Area (IBA). As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the 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 South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the Botanical Garden and Whitehall Forest. As described in Section 3.8.3.3.4, noise and light would have minimal impacts on wildlife. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 2 Issue Code: 15.2

DHS notes the commentor's concern. Adverse effects to quality-of-life resources would not be expected with any of the site alternatives and are discussed in Section 3.10 of the NBAF EIS.

Comment No: 3 Issue Code: 25.0

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

Campaign 06

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CD0600

From: info@athensfaq.org on behalf of Mary McDonald [REDACTED]

Sent: Thursday, July 31, 2008 9:04 PM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 21.2 | It is clear in this post – 9/11 age that we continue to be plagued by fears about terrorism. Logic says that the NBAF will be a prime symbolic target for domestic or foreign terrorists, and therefore should not be in the middle of a populated area such as Athens.

2| 24.1 | Please put it elsewhere where lives will not be at risk, or do the work in existing facilities.
Sincerely,
(Your Name)

Comment No: 1 Issue Code: 21.2

DHS notes the commentor's concern that the NBAF would be a 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: 2 Issue Code: 24.1

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 NBAF, would enable NBAF to be safely operated in populated areas such as Athens. An example is the Centers for Disease Control and Prevention located in downtown Atlanta.

As noted in Section 1.1 of the NBAF EIS, the United States can not rely on similar existing facilities to meet the NBAF mission because the facilities do not have the capacity nor could their availability be guaranteed when required.

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CD0700

From: info@athensfaq.org on behalf of Sheila Ross [REDACTED]
Sent: Thursday, July 31, 2008 8:40 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1| 18.2 | How can we as a community evaluate the environmental impact of incineration of thousands of pounds of infected carcasses in Athens, GA when the DEIS only mentions it as a possibility?
- 2| 23.0 | Is incineration likely? When will you disclose what is required by NEPA regarding incineration as a disposal method? What alternate method might be used and what are the impacts?

Sincerely,
 Sheila Ross

Comment No: 1 Issue Code: 18.2

DHS notes the commentor's concern. Section 3.13.2.2 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). The final design for the NBAF would probably include more than one technology for the treatment of these wastes. Of the technologies being considered, incineration has the highest potential to adversely impact air quality, so the evaluation in Section 3.4 assumed only incineration would be used to assess the greatest potential adverse effect. Alkaline hydrolysis would have the greatest potential adverse impact on sanitary sewage capacity, as discussed in Section 3.3 so the sanitary sewage effects were determined using this method.

Any technology used to dispose of animal carcasses and pathological waste would have to comply with all applicable federal, state, and local laws, regulations, and permits related to air and wastewater quality including requirements to notify the public of any pending permit actions and possible environmental impacts.

Comment No: 2 Issue Code: 23.0

Should a decision be made to build the NBAF and following site selection and final design, a complete emission inventory would be developed and refined modeling performed, as necessary, to ensure compliance as noted in Comment No. 1.

Campaign 08

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CD0800

From: info@athensfaq.org on behalf of Margaret R Spalding [REDACTED]
Sent: Thursday, July 31, 2008 10:46 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

NBAF has been promoted by ever-changing "facts" put out by UGA and DHS. Why do you choose to gloss over the real dangers presented by NBAF in the middle of our community? How does DHS propose to deal with our 100-year drought that is still persisting? Do you plan to "trust" Mother Nature just as you ask us to "trust" technology and training to keep a catastrophic accident from occurring?

We do not want NBAF in Athens!

Sincerely,
 Margaret R Spalding

Comment No: 1 Issue Code: 12.2

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

Comment No: 2 Issue Code: 21.0

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

Comment No: 3 Issue Code: 25.2

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

Campaign 09

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CD0900

From: info@athensfaq.org on behalf of Rev. Troy A. Tatum [REDACTED]
Sent: Wednesday, July 30, 2008 9:36 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

The DEIS clearly shows that the Athens, GA site is neither safe nor compatible from an environmental standpoint for the construction of NBAF.

1) 25.2

Please do not act irresponsibly in the face of such overwhelming evidence. NBAF should not be in Athens.

I am strongly opposed to NBAF and will continue to actively work against any effort to bring NBAF to our community.

Sincerely,
Rev. Troy A. Tatum

Comment No: 1 Issue Code: 25.2

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

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CD1000

M. Smith Griffith
[REDACTED]

August 4, 2008

Mrs. Robert W. Lawson, Jr.
[REDACTED]

Dear Mrs. Lawson,

This is an urgent follow-up to my letter to you dated April 15, 2008.

1|25.2 | Our beloved State Botanical Garden in Athens continues to be threatened by the federal Department of Homeland Security's effort to secure a site for its proposed 520,000 square foot bio-terror defense laboratory, the National Bio and Agro- Defense Facility (NBAF). Sadly and ironically, our equally beloved University of Georgia, under the auspices of which the Botanical Garden exists, continues as the chief proponent and enabler of this environmentally destructive and potentially tragic undertaking on South Milledge Avenue.

DHS recently released its 1000+ page Draft Environmental Impact Statement, part of a study required by the National Environmental Policy Act of 1969. The DEIS details what effect NBAF, if built, would have on certain aspects of the environments of the six locations being considered. Among the issues examined in the DEIS are questions pertaining to water (NBAF would use an average of 118,000 gallons per day, with peak use of up to 275,000 gpd in the summer months), air quality, noise, biological resources, traffic, waste management and public health and safety.

As you might imagine, the Botanical Garden would suffer first, and most, from NBAF being located next door. However, in one or more worse case scenarios, the entire region could suffer billions in economic losses (from a necessary mass slaughter of livestock and wildlife), and foreign diseases—some fatal to humans—spread by mosquitoes (which will be bred by the thousands in NBAF's "Insectary") could become permanently entrenched in our environment. But don't take my word for the risks and environmental degradation that NBAF would impose on us—you can read it in DHS's own language. I have enclosed excerpts from the DEIS. Disingenuously, these items of information are buried deep in the massive document and not easily found, so I included page references.

On August 14 at the Georgia Center for Continuing Education on Lumpkin Street, DHS will host two public meetings (one from 12:30 pm to 4:30 pm and one from 6:00pm to 10:00 pm) to elicit comment from the community regarding NBAF and the DEIS. This

Comment No: 1

Issue Code: 25.2

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

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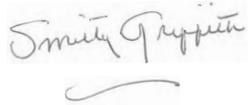
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1|25.2 cont |may be our last opportunity to let the folks from DHS know in person that NBAF is not welcome in Athens. We also can give our comments by telephone, email and regular mail. I have enclosed instructions published by DHS. The "official record" closes on August 25, after which our concerns, not previously communicated, become irrelevant to DHS's decision-making process.

I plan to let my voice be heard. I sincerely hope most of you will join me, along with a majority of the citizens of our community, in saying "No" to NBAF.

Best wishes,



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CD1000

NBAF DEIS page 2-46 Public Health and Safety

The primary hazard of the NBAF operations is the release of pathogen and the consequences of its release. There are very few accident scenarios that would result in animal or human disease, the exceptions being an over-pressure event resulting in loss of containment and a facility fire, both of which present a MODERATE RISK RANK for DISTANCES CLOSE to THE RELEASE. **Because of the potential for easy spread of the disease via infected livestock, wildlife and vectors, the overall risk rank is designated MODERATE.**

Page 2-36 Biological Resources

Effects to biological resources would occur from site clearing associated with construction of the NBAF. Approximately 30 acres of disturbed vegetation and 0.2 acres of forested uplands would be removed. Wetlands (>0.5 acre) and associated buffer areas may be affected due to proposed road crossings. Threatened or endangered species, aquatic resources and wildlife would not be directly affected by construction or *normal* operations. **An accidental release of pathogens from the NBAF would adversely affect selected wildlife populations.**

(note to reader: "Normal" operations, according to its use in the DEIS, are operations during which nothing goes wrong. Thus, DHS throughout the DEIS gives the circular assurance "normal operations means nothing goes wrong during operations. Thus during "normal" operations the risks are very low.")

Page 2-29 Visual Resources

The NBAF would be similar in size to a 400-bed hospital or a 1,600 student high school, and would be a NOTICEABLE LANDSCAPE FEATURE, particularly to visitors and staff at the nearby Botanical Garden. **(note to reader: 520,000 square feet is the size of 2 ½ Super Wal-marts)**

Page 2-32 Air Quality

Air quality effects would occur with construction and operation of the NBAF. Air emissions from construction activities would include construction traffic and equipment. Operation of the NBAF would result in air emissions from boilers, emergency generators, and traffic from employees and deliveries. Additional air emissions would occur from carcass and pathological waste treatment and may include incineration, alkaline hydrolysis, or rendering.

Page 2-33 Noise

Temporary effects to noise levels may be experienced by the Botanical Garden and residents due to construction activities....**(note to reader: the construction period is expected to last at least four years—probably many more based on recent experience.)**

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Visual Resources

page 3-10

Sensitive visual receptors in the vicinity of the South Milledge Avenue Site include patrons and employees of the University of Georgia **State Botanical Gardens**, located approximately 0.5 miles northwest of the proposed NBAF site.

Construction activities would disturb approximately 30 acres, plus additional acreage for temporary construction areas. During construction of the NBAF at the South Milledge Avenue Site, viewers would observe site grading and related construction activities, which would include the stripping of grass and removal of trees and other vegetation. **There would be heavy equipment vehicles conducting earthwork activities on the NBAF site during the 4-yr construction period**, as well as light- and medium-weight vehicles going to and from the site. Deliveries of soil, backfill, and building materials would be expected on a daily basis. Fencing and screening of the construction site would curtail sight visibility.

In general, visual impacts to the overall landscape setting resulting from construction of the NBAF would be high. Viewers would observe earthwork equipment, construction trailers, building construction, and cranes. A temporary security fence to prevent trespassing and control traffic entering and leaving the NBAF site would also serve to provide some visual screening of the construction area.

page 3-12

Visual impacts from the proposed NBAF would be high. The main building would be prominent in the viewshed due to its position on a hilltop. It would be similar in size to a 400-bed hospital or a 1,600 student high school. Although portions of the main building would be underground, the heights of project components have not been finalized at this time but could be up to 90 feet high (NDP 2007a). Other ancillary elements that would likely be visible include fuel and liquid storage tanks, an electrical switchyard, emergency power generators, and power lines (NDP 2007a). If incinerators are included in the final design, stacks would likely be visible, as well. A proposed upgrade to the municipal potable water system includes the installation of a dedicated, on-site 200,000 gallon elevated water tank at the South Milledge Avenue Site that would be a prominent visible feature. The entire facility would be surrounded by a security fence, which itself would be a highly visible element.

Additional visual impacts would occur from lighting during the nighttime. The main facility, all support buildings, and the parking lot would be well-lit. Lighting is also proposed at regular intervals along the security fence.

The proposed NBAF would be visible to travelers on South Milledge Avenue and East Whitehall Road. **Due to the facility's topographical prominence on the landscape, visual effects would be sustained.** It would also be visible from other viewpoints such as the **Botanic Gardens** and nearby University of Georgia facilities.

The visual impact could be partially ameliorated by limited vegetative screening and setbacks. Landscaping is planned around buildings and adjacent to parking areas. However, vegetative screening would not be used along the fence for security purposes. Additional design features that could help ameliorate visual impacts include the following:

- Some existing native trees could be maintained around the perimeter of the site to serve as landscape buffers and to increase NBAF's visual compatibility with the surrounding area.
- Trees could be planted to help screen the view of the site. These plantings could include fast-growing trees to expedite the development of a mature vegetative screen.

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CD1000

Potable Water Supply

page 3-35

The projected water consumption at the NBAF ranges from 50,000 gpd to 275,000 gallons/day. The estimated total annual water consumption at the South Milledge Avenue Site is 43,000,000 gallons. ✖

The current Athens-Clarke County Public Utilities infrastructure of an existing 8-inch force main on South Milledge Avenue would not meet the potable water feed redundancy specifications or the consumption/peak flow requirements for the proposed NBAF without substantial improvements. Based on the information provided, the proposed improvements would not comply with the redundancy specifications and the peak flow requirements for the proposed NBAF.

An alternate infrastructure improvement plan, authored but not recommended by Athens-Clarke County, is to extend a 12-inch water line to the South Milledge Avenue Site along Whitehall Road from the intersection of Barnett Shoals Road and Gaines School Road and to extend a second, redundant 12-inch water line to the South Milledge Avenue Site from Riverbend Road. Should this alternative be selected, the alternate improvements would comply with both the redundancy specifications and the peak flow requirements.

Noise

page 3-88

The University facilities and the few non-University neighbors, including the **State Botanical Gardens**, may experience temporary construction noise effects. Also, construction noise would temporarily disperse wildlife from adjacent undeveloped areas. Potential noise sources would include variable pitch and volumes from vehicles and equipment involved in site clearing and grading, creating, and/or placing engineered structures and conducting interior/exterior finish work. The construction phases would dictate the equipment types, thereby influencing the audible emissions. These acoustic sources would vary with the construction timeline, such as earthwork noise emissions, progressing into concrete pours, and with transitioning to steel erection associated with framing the superstructure of the facility. These construction noises would be limited in duration and restricted to normal construction hours dictated by local noise ordinances.

Operation of the NBAF at the South Milledge Avenue Site would not result in anticipated adverse effects on noise-sensitive receptors. The most audible noises would emanate from the traffic related to the facility and the heating, cooling, and filtration systems. Wildlife would be expected to return to adjacent undeveloped areas following construction; however, operational noises from the NBAF would likely discourage on-site fauna ✖ rehabilitation.

A potentially significant noise emission source would be the emergency generators; however, the generators are a back-up response system and would not be a routine noise emission source.

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CD1100

From: info@athensfaq.org on behalf of GARNET FAULKNER [REDACTED]

Sent: Thursday, July 31, 2008 10:49 PM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1| 6.2 | There is no mention in the DEIS of moving the horses and relocating the many functions that take place yearly at the recently-built Livestock Instructional Arena already existing at the NBAF site in Athens, GA. The FEIS must address this "elephant in the room." NBAF does not belong in Athens and certainly not at this beautiful site that is already at its highest and best use.
- 2| 25.2 |

Sincerely,
(Your Name)

Comment No: 1 Issue Code: 6.2

DHS notes the information submitted by the commentor. Section 3.2.3 acknowledges the proximity of the University of Georgia Livestock Instructional Arena to the South Milledge Avenue Site in Section 3.2.3. The arena would not be affected by construction or operation of the NBAF. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Section 3.2.3. DHS and USDA would ensure that the NBAF operation at the South Milledge Avenue Site would comply with all applicable local, state, and federal regulations and policies.

Comment No: 2 Issue Code: 25.2

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

