

Diepenbrock, Leigh

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WD0485

From: Leigh Diepenbrock [REDACTED]
Sent: Friday, August 22, 2008 12:16 PM
To: NBAFProgramManager
Subject: I support NBAF in Kansas

1) 24.4 | NBAF is the National Bio and Agro-Defense Facility that will be one of the largest federal research facilities in the US. Please bring this state of the art laboratory facility to Kansas.

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

Dietz, Brian

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WD0407

From: Dietz, Brian [REDACTED]
Sent: Wednesday, August 20, 2008 12:48 PM
To: NBAFProgramManager
Subject: NBAF should be located in Kansas

I am a long time Kansas and Nebraska resident and have lived within a few hour's drive of Manhattan, Kansas for most of my adult life. I am also a graduate of the College of Agriculture and Natural Resources at the University of Nebraska and a graduate of the University of Kansas' School of Law. During my undergraduate years, I traveled to Konza Prairie near Manhattan to conduct invertebrate herbivore research with my former professor who is now teaching at Kansas State University as a professor of biology. Kansas State and the regional universities, businesses, and individuals involved in the crop science and animal health industries have created the infrastructure and expertise necessary to support and synergize with a facility like the NBAF. Locating the facility in Kansas would be an excellent fit for both the facility and the region. I encourage you to select Manhattan, Kansas as the location for this facility.

Brian Dietz
[REDACTED]

Comment No: 1

Issue Code: 24.4

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

Dodd, DDS, Chad

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PD0187

August 22, 2008

1|24.4

I support NBAF in Kansas.

Chad Dodd, DDS

Comment No: 1

Issue Code: 24.4

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

Dodds, Walter

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WD0119

From: Walter Dodds [REDACTED]
Sent: Monday, July 28, 2008 10:50 AM
To: NBAFProgramManager
Subject: comments on NBAF Environmental Impact Statement
Attachments: Attachment information.; Response to the NBAF environmental impact statement.docx

please see attached

Walter Dodds, Division of Biology, Kansas State University
[REDACTED] KS [REDACTED] USA

Dodds, Walter

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WD0119

Response to the NBAF environmental impact statement

While the environmental impact statement addresses some important issues, it does not deal with all issues thoroughly enough.

- 1) 21.4 The facility will not be constructed to resist substantial damage from an EF4 or EF5 tornado. An EF4 tornado came within a few miles of the proposed facility on June 11th 2008. On June 8, 1966 a tornado with winds easily exceeding 90 mph almost directly hit the proposed location. The risk analysis assumes 90 mph winds, but this wind speed is exceeded in an EF1 tornado or greater. In particular, if a direct lightning strike disrupts power, and then there is a drastic drop in air pressure as a tornado passes, will containment be maintained? If containment is not maintained, the storm could move pathogens many miles from the Manhattan NBAF facility.
- 2) 15.4 An economic estimate of livestock values in Riley County and the 6 surrounding counties does not take into account the economic damage to the entire region if foot and mouth disease or any other high contagious disease is released. Cattle from the entire region will not be saleable for some time until the release is contained for certain. This damage occurs in addition to animals that would need to be destroyed.
- 3) 21.4 Risk analysis of infection is incomplete and poorly presented. The studies summarized in Table b 3.2 on international incidents at BSL-4 facilities that are domestic and international note no cases of infection, but incidents are known to have resulted in infection in some international facilities. If it is assumed that there are 100 workers in an NBAF BSL3 or BSL4 facility, 40 hours a week for 48 weeks a year, for 10 years, there will be 1.9 million hours worked in high-hazard areas. Given data on b.3-1 this would lead to about 2.5 infections and 12 exposure events over a decade of operation. A clear summation of release probabilities and how these relate to actual accident data from existing facilities is not presented.
- 4) 21.4
5) 19.4 The release probabilities for an atmospheric release event are based on an even, circular release pattern, while prevailing winds, and high average wind speeds in the Manhattan area suggest that the potential for aerial dispersal in case of accidental release is incompletely represented, and that spread from the Manhattan site would be more extensive than some of the other sites that are being considered.

Comment No: 1 Issue Code: 21.4

DHS notes the commentor's concern. DHS recognizes the potential for tornados to occur in the region including the Manhattan Campus Site. Additional information regarding design of the facility to withstand severe events in Kansas such as tornados is included in Section 3.4.4. A discussion of human health and safety is presented in Section 3.14 and includes discussion of mitigation measures to reduce the potential effects of tornados. 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: 2 Issue Code: 15.4

DHS notes commentor's concern. The evaluation of an accidental release of FMD virus presented in Section 3.10.9 and Appendix D of the NBAF EIS included national-scale economic consequences as well as local economic consequences for all sites including the Manhattan Campus Site Alternative that took into account lost revenue and slaughter costs of infected herds among other outbreak control costs.

Comment No: 3 Issue Code: 21.4

DHS notes the commentor's concern. Appendix B is a compilation of incidents at the BSL-3 and BSL-4 laboratories. International events are summarized in Table B.4-1 and B.4-4. The risk to the laboratory worker is well understood and laboratory acquired illness have not been shown to be a threat to the community at large. The NBAF would incorporate modern biocontainment technologies and safety protocols, as further discussed in Chapter 2, Section 2.2.1.1. Employee training, Chapter 2, Section 2.2.2.1 of the NBAF EIS, discusses the requirement that all laboratory staff would receive 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. Operations involving

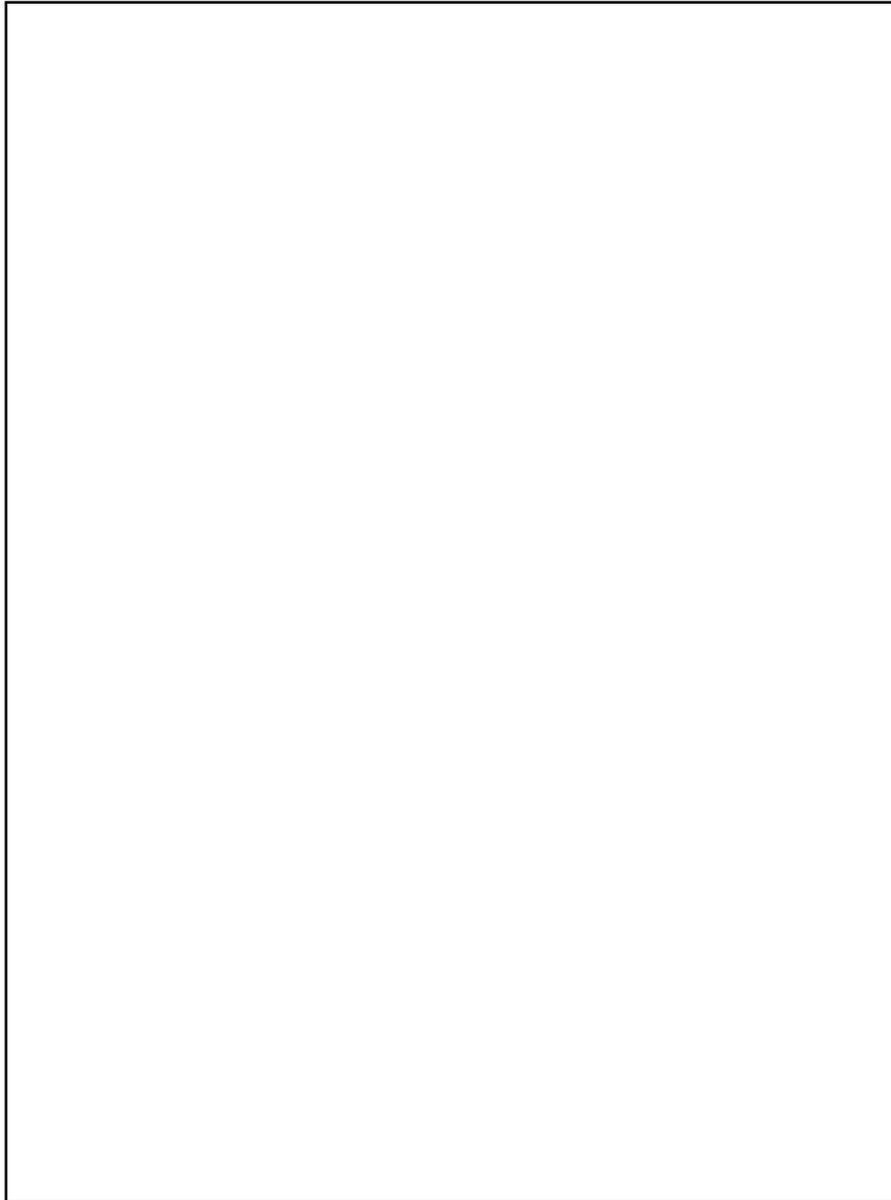
biohazardous materials could only be conducted by qualified, trained personnel after institutional acceptance of the work and concurrence by the IBC. A discussion of human health and safety is included in Chapter 3, Section 3.14 and Appendix E of the NBAF EIS. A description of potential safeguards can be found in the NBAF Engineering Technical Feasibility Study. DHS is aware of previous biosafety lapses and will continue to analyze these events in order to provide improvements to the structural and engineered safety in the final NBAF design, and in the operating procedures, monitoring and other protocols that will further reduce the chances of a laboratory worker exposure. Personnel working within the NBAF laboratories would participate in a medical monitoring and surveillance program. Prior to working with BSL-3 biohazardous materials, laboratory personnel would be provided with appropriate preventative measures for the biohazardous materials to be handled. Preventative measures could include an inoculation program, where applicable, to develop the worker's antibody resistance to infection. Medical treatment would be readily available in the event of an accidental exposure. Medical treatment could consist of antimicrobial and anti-toxin treatments, where applicable, aimed at counteracting accidental exposure. Treatment plans would be developed for specific agents and biological toxins relative to the hazards presented by the respective biohazardous material. Work with BSL-4 agents involves special challenges for occupational health. Infections of laboratory staff by such agents may be expected to result in serious or lethal disease for which limited treatment options exist. Advance planning for the provision of medical care to laboratory personnel potentially exposed to or infected with BSL-4 agents would be a fundamental component of an NBAF occupational health program. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 4 Issue Code: 21.4

DHS notes the commentor's concern regarding accidental releases. Sections 3.14.2, 3.14.3, and 3.14.4.2 of the NBAF EIS describe the hazard and accident analysis methodology, accident analysis, and site-specific consequences. Section 3.10.4.1.3 describes community services including emergency response.

Comment No: 5 Issue Code: 19.4

DHS recognizes the issues in conveying highly technical methodology and analytical results to persons not familiar with the risk assessment field. Section 3.13 and Appendix E explain that under a pathogen release event the diagram and data represents a time integrated pathogen concentration at each distance within regard to direction at the 95% confidence level. This is not a plume event. Local site specific meteorological data was used in the data analysis. Information is contained within the body of the EIS that summarizes the risk assessment process so that the lay reader can obtain a general understanding of the comprehensive nature of the analysis. Results are summarized for each potential NBAF location in qualitative terms (e.g., low, moderate and high risk). The supporting information and data is provided so that the interested reader is able to understand how the quantitative approach is summarized qualitatively. Site specific meteorological data was obtained



from the nearest measurement location in order to arrive at the near and far field concentrations. Appendix E of the NBAF EIS provides additional technical information so the reader with a comprehensive understanding or interest is provided with additional information to gain a through understanding of the methodology and results.

Dodson, Michael

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AUG 24 2008 7:38PM WEIS REAL ESTATE

NO. 743 P. 1

FD0051

Michael L. Dodson
Lieutenant General USA (ret)

23 August 2008

U.S. Department of Homeland Security
Science and Technology Directorate
Mr. James V. Johnson
Fax 1-866-501-6223
Mail Stop #2100
245 Murray Lane, SW, Building 410
Washington, DC 20528

Dear Mr. Johnson,

1| 24.4

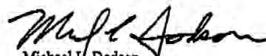
I am writing to express my strong support for locating the National Biological and Agricultural Defense Facility (NBAF) in Manhattan, Kansas.

The technical reasons for locating the NBAF in Manhattan have been well documented, but warrant reinforcement. KSU has nationally recognized departments in Grain Science, Veterinary Science, Chemistry, is home to the National Agricultural Biosecurity Center, has programs in nanotechnology and has recently added the Biosecurity Research Institute (BRI). The professional men and women who staff these facilities are widely recognized experts in these exacting disciplines and are supported by equally dedicated staff and University leadership. These specialized people and programs would form a powerful synergy with the NBAF.

Manhattan is a progressive and intellectually vibrant community of people with deeply held values. You can find no stronger supporters of our nation and our military men and women. They have been likewise supportive of programs that protect the livelihoods of themselves and their neighbors; largely in providing grain and livestock for our economy. It is important to note that the citizens have been supportive of developing cutting edge science through public initiatives such as nanotechnology.

As one with relevant experience in my military service as well as in my current employment I know that the NBAF will be operated under the strictest provisions of safety and security. The citizens of Manhattan will become informed and supportive advocates of the NBAF and will further guarantee its security and success.

Sincerely,



Michael L. Dodson
Lieutenant General USA (ret)

Comment No: 1

Issue Code: 24.4

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

Domenici, Marie

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WD0020

From: Marie Domenici [REDACTED]
Sent: Sunday, June 29, 2008 2:46 PM
To: NBAFProgramManager
Subject: Plum Island BSL-3 vs BSL-4

To Whom It May Concern:

1) 25.1 I want to go on record as opposing the upgrade of Plum Island from a BSL-3 to a BSL-4. The following are the reasons I oppose the upgrade:

2) 15.1 A disease like foot and mouth disease has been around since the 1800's and should it find its way into
 3) 19.0 the livestock population, the financial impact on Long Island will be catastrophic. Livestock on the Island would have to be eliminated, and at what cost to our farmers, economy and ultimately our general health and well being? So, to say "Plum Island would best be served on Long Island and will have "minimal" adverse environmental impacts, according to the DEIS", is an oxymoron. Catastrophic, is just that...catastrophic regardless of the location!

I am not comfortable or confident in knowing a BSL-4 lab will be studying "exotic pathogens that pose a high risk of life threatening disease in animals and humans through the aerosol route and for which there is no known vaccine or therapy."

4) 17.1 I find the transportation of these pathogens to Plum Island extremely disturbing. They are flown in from countries like Africa to JFK airport; then shipped via Federal Express to Orient and ferried over to Plum Island. The question I have is, what role and responsibility does Homeland Security play from the time the pathogen ships from Africa and arrives in Orient? Who's minding *that* package? Is the Fed X driver aware that he/she is transporting a pathogen that could have devastating effects in the event of an accident?

5) 21.1 What if the Fed Ex truck has an accident? What if a terrorist or a terrorist "wanna be" decides to make life a little inconvenient in Suffolk County? I seem to remember an incident on 9/11 which was catastrophic where many lives were lost. Remember, in the eyes of a terrorist, any dead American is reason to celebrate. I think the lack of security in the transportation of such pathogens is naive and a total lack of regard, by the DHS, for the safety of all who could be at risk during transportation.

6) 5.0 Why import these pathogens from Europe, Central & South America? Why not build the BSL-4 Lab in Africa and conduct research there? Why transport these viruses from various countries and then drive through three (3 counties) Queens, Nassau and Suffolk Counties with little or no security? Fed X is not delivering an order from Macy's, it's delivering a very dangerous pathogen with "no security!"

7) 9.1 I am gravely concerned about the daily incineration of experimental animals that have been infected
 8) 18.0 with dangerous pathogens. Although, Plum Island monitors the air quality regularly, who gets the results of these reports? How quickly is the information disseminated? We can get a daily pollen count but who gets reports on the air quality after they incinerate these animals? Currently, the communities surrounding Plum Island do not have immediate access as to the air quality results.

Once again, "what if" an incinerated animal that was has been exposed to a deadly pathogen causes the air quality to be considered unhealthy or questionable, when would the public find out about it? It

Comment No: 1 Issue Code: 25.1

DHS notes the commentor's opposition to the Plum Island Site Alternative.

Comment No: 2 Issue Code: 15.1

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. The risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 billion in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

Comment No: 3 Issue Code: 19.0

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

Comment No: 4 Issue Code: 17.1

DHS notes the commentor's concerns. Pathogens are currently transported to the Plum Island Animal Disease Center on a regular basis without incident. A discussion of accidents involving transportation of pathogens is included in Section 3.11.9.

Comment No: 5 Issue Code: 21.1

DHS notes the commentor's concern that the NBAF would be a prime terrorist target. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (TRA) (designated as For Official Use Only) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses

associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

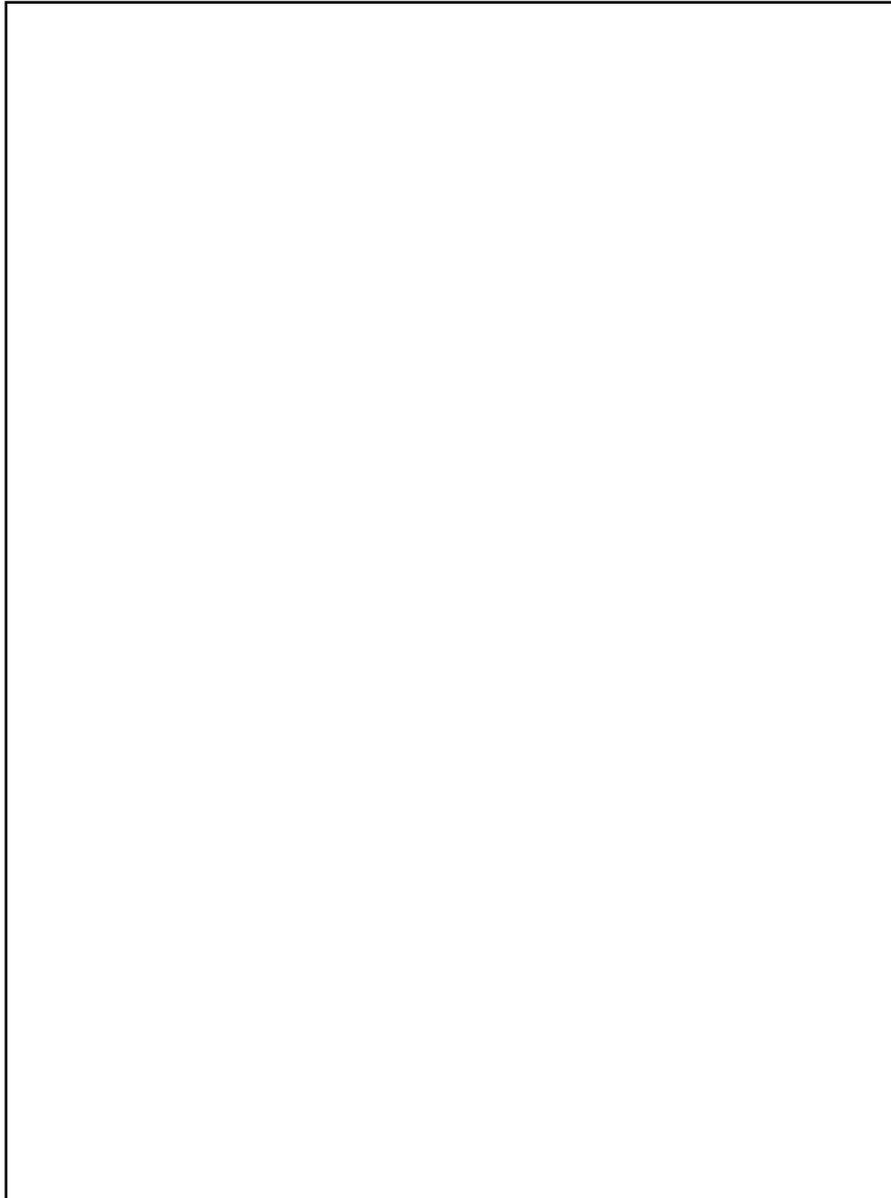
DHS also notes the commentor's concerns regarding the handling and transport of packages containing pathogens. The general regulations governing the required NBAF handling and transport of packages containing pathogens, and a discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. Section 2.2.2.3 provides detailed information on the handling and transport of packages containing pathogens. Additionally, an analysis of accidental releases during transportation is provided in the NBAF EIS under Section 3.14, Health and Safety. Information regarding the existing road conditions and potential effects to traffic and transportation from the Plum Island Site is provided in Section 3.11.6 of the NBAF EIS. An emergency response plan that would include area evacuation plans would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations. With regard to the shipment of pathogens, no specific transportation corridors have been evaluated. Should a decision be made to build NBAF and a site selected, transportation routes would be identified in accordance with a standard shipment procedure with the route optimized for safety and security.

Comment No: 6 Issue Code: 5.0

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

Comment No: 7 Issue Code: 9.1

DHS notes the commentor's concerns regarding air quality in the Plum Island region. Section 3.4.2.1.2 of the NBAF EIS describes Suffolk County as in non-attainment for O₃ and PM_{2.5} based on New York State Department of Environmental Conservation (NYSDEC) ambient air monitoring stations sited in densely populated areas to the west of Plum Island. NYSDEC also issues and oversees the necessary operational air permits and any associated monitoring reports. Section 3.4.1 describes the methodology used in assessing potential air quality consequences. Air emissions were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards.



Comment No: 8

Issue Code: 18.0

DHS shares the commentor's concern for the potential air quality impacts that could result from the incineration of experimental animals. As discussed in Section 3.13.1.2 of the NBAF EIS, incineration is only one of the technologies being considered for carcass and pathological waste disposal. 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). As discussed in this section, the final design for the NBAF will probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4. of the EIS (Air Quality) assumes that incineration, the treatment technology with the greatest potential to negatively impact air quality, will be used to assess the maximum adverse effect.

Domenici, Marie

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9| 27.0 behooves the communities of both the North & South Forks to have daily air monitoring, with results reported to the Town Supervisors, to ensure the health and well being of these surrounding communities is being addressed. Is there any wonder why Suffolk County has the largest population of Breast Cancer, which by the way, no one can explain why; Or can they?

10| 15.1 Back in the 50's when Plum Island was established, how many people lived on the North Fork? At the time, Plum Island was a viable location. That theory no longer holds true today. The population in Southold in 1860, when foot and mouth disease was first discovered, was 5,833 residents and today the population, according to the 2000 census, is 20,599. This does not include summer residents and we know the population of Southold has significantly increased since the 2000 census.

11| 4.1 At the April 15, Southold Town Plum Island public meeting, after giving my public comment, I gave my contact information to one of the staffers so I could speak with the Director of Plum Island and to date, I have not heard back from anyone.

12| 2.0 I am not confident the agencies in place that are responsible for overseeing public health and well being, have the resources to protect the general population in the event of a catastrophic event, whether on Plum Island or elsewhere. Have you eaten a tomato lately? Are your children playing with toys made in China? Have you taken medication(s) which has been taken off the market?

1 cont| 25.1 For all the reasons cited above, I strongly oppose upgrading to a BSL-4.

Thanking you in advance for your consideration.

Marie Domenici



No virus found in this outgoing message.

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Version: 7.5.526 / Virus Database: 270.4.3/1524 - Release Date: 6/28/2008 7:42 PM

Comment No: 9 Issue Code: 27.0

DHS notes the commentor's concern; however, breast cancer rates are not known to be related to the NBAF or similar facilities and were not reviewed during the course of this evaluation.

Comment No: 10 Issue Code: 15.1

DHS notes the commentor's opposition to the Plum Island Site Alternative. The potential economic effects of an accidental release are discussed separately in Section 3.10.9 and Appendix D of the NBAF EIS. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as \$4.2 billion until the U.S. was declared foreign animal disease free.

Comment No: 11 Issue Code: 4.1

DHS notes the commentor's request to speak with the Director of PIADC. DHS regrets any difficulties the commentor had in contacting Dr. Barrett, the Director of PIADC. Dr. Barrett has made himself available to the public on numerous occasions to provide information and answer questions regarding PIADC operations.

Comment No: 12 Issue Code: 2.0

DHS notes the commentor's lack of confidence in the DHS and concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. DHS 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 with a minimal degree of risk, regardless of the site chosen. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 and Appendix E of the NBAF EIS. The risks were determined to be low for all site alternatives. 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.

Domizi, David

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PD0004

June 30, 2008

My name is David Domizi, and I live at [REDACTED] GA. My phone number is [REDACTED], and I am calling to express my opposition of the building of the proposed NBAF Facility in Athens, GA.

To me, Athens would be an unworkable, irresponsible choice for a variety of reasons. The Draft EIS has just showed really that there's not a safe place within the proposed possible locations, that are being considered currently. Really, none of these places are truly safe. There is a great likelihood of a very rapid spreading of virus and infection should there be an outbreak in really in any of these areas via vegetation and animals and general environment of the area.

So, of course, Georgia is very susceptible to mosquito problems and such, so for that reason the fact that the statement also shows that Plum Island, of any of the proposed locations, is the safest and also logistically, logically is probably the smartest place to go because it already has an existing facility. It's probably even building a new facility there as opposed to this current area is going to be cheaper for the government as well as the residents of the area. And so, that's another reason.

Athens is in a severe long-term drought--water crisis. We simply don't have 118,000 gallons of water per day to give to the site and it really offends me the idea that someone would consider to do that here.

Over the last several years, and especially the last year, the sacrifices that our community has had to make....I mean just the change in daily behavior in my own house and not being able to wash my car and water my....all of my plants and things. We've made a lot of sacrifices as a town and as a family for me, and the idea of building a facility like that, that would hog up an insane amount of water, it's just irresponsible....it's like a slap in the face to our town.

So, finally, just the developing in such a radical and large nature of an undeveloped green space in our town, that among other things, neighbors the Georgia State Botanical Gardens, and would be a visual affront and disruption of that facility.

All of these things just make this an....it's just an illogical choice and it's irresponsible. There are a variety of reasons why it just doesn't make sense.

So, I strongly oppose the building and I hope to see that not appear in Athens.

Thanks very much.

1

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: 19.0

DHS notes the commentor's opinion that the proposed NBAF research could not be safely conducted at any of the five mainland site alternatives and the commentor's concern about the risk to health and safety from the NBAF operation. 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 with a minimal degree of risk, regardless of the site chosen. 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.

Comment No: 3 Issue Code: 21.0

DHS notes the commentor's concerns regarding the impact of an accident on the local population, livestock, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and the site specific consequences of each accident scenario to human populations, agriculture and livestock and wildlife. 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Manhattan Campus Site, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area, to include agricultural livestock. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 4 Issue Code: 13.2

DHS notes the commentor's concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations,

particularly in a warm, humid climate such as near the South Milledge Avenue Site, was evaluated in Section 3.8.9 and Section 3.10.9 as well as in Section 3.14 (health and Safety). As described in Section 3.8.3.1.1, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. DHS recognizes that the NBAF would be a distinctive, visible feature and would alter the viewshed of the area.

Comment No: 5 Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative.

Comment No: 6 Issue Code: 12.2

DHS notes the commentor's concern regarding the proposed water use and existing water supply. Section 3.3 includes an evaluation of infrastructure including potable water, and Section 3.7 includes an evaluation of water resources. As stated in Section 3.3.3.3.1, there is adequate capacity of 43,000,000 gallons per year, but some infrastructure improvements would be required. DHS acknowledges that drought conditions exist in the region, but the NBAF would only account for a minor increase in water use compared to recent development trends.

Comment No: 7 Issue Code: 7.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Chapter 3, Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area.

Comment No: 8 Issue Code: 6.2

DHS notes the commentor's concern regarding development of the South Milledge Avenue Site which is described in Section 3.2.3. A change in land use and loss of open space would occur; however, current zoning regulations allow for this type of development. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Chapter 3, Section 3.2.3. DHS and USDA would ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and policies.

Domizi, David

Page 1 of 1

WD0022

From: David Domizi [REDACTED]
Sent: Tuesday, July 01, 2008 11:20 AM
To: NBAFProgramManager
Subject: No NBAF in Athens, GA!

Hi,

1| 25.2 I'm writing to express my opposition to the building of the proposed NBAF facility in Athens, GA, one of the possible locations.

Athens would be an unworkable, irresponsible choice for several reasons.

- 2| 21.0 1. The DEIS just released shows that none of the currently proposed sites would be a truly safe place to build this facility.
 3| 5.1 2. Plum Island is the safest place of the known possible sites.
 4| 12.2 3. Athens is in a severe, long-term draught water crisis and simply does not have the 118,000 gallons per day of water that the site requires. It offends me to think of the sacrifices that I, my family, and my town have made to live with this situation, and then to think that a facility like this would be even considered. It would be reckless and irresponsible, and a slap in the face to our town's populace.
 5| 19.2 4. Spreading of viruses and infection could happen rapidly in our area, esp via infected insects, if an outbreak were to occur, according to the DEIS.
 6| 21.0 5. This facility would destroy the undeveloped nature of this area of our town and the neighboring Georgia State Botanical Gardens.
 7| 13.2

For these, and many other reasons, I strongly object to the proposed facility being built in Athens. It just doesn't make sense, and it would be a terrible choice with many bad consequences to our community.

Do not build NBAF in Athens, GA!

Sincerely,

Dave Domizi

GA [REDACTED]

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: 21.0

DHS notes the commentor's opinion that the proposed NBAF research could not be safely conducted at any of the five mainland site alternatives and the commentor's concern about the risk and impacts associated with a potential release of a pathogen from the NBAF operation. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations was evaluated in Section 3.8.9 and Section 3.10.9 as well as in Section 3.14 (health and Safety) of the NBAF EIS. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. The RVF response plan would also include a mosquito control action plan. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

Comment No: 3 Issue Code: 5.1

DHS notes the commentor's support for the Plum Island Site Alternative.

Comment No: 4 Issue Code: 12.2

DHS notes the commentor's concern regarding the proposed water use and existing water supply. Section 3.3 of the NBAF EIS includes an evaluation of infrastructure including potable water, and Section 3.7 includes an evaluation of water resources. As stated in Section 3.3.3.3.1, there is adequate capacity of 43,000,000 gallons per year, but some infrastructure improvements would be required. DHS acknowledges that drought conditions exist in the region, but the NBAF would only account for a minor increase in water use compared to recent development trends.

Comment No: 5 Issue Code: 19.2

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

Comment No: 6 Issue Code: 21.0

DHS notes the commentor's concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. 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 Section 3.8.9 and Section 3.10.9 as well as in Section 3.14 (Health and Safety).

Comment No: 7 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the site to the State Botanical Garden. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife. 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 wildlife impacts 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.

Donelin, Dan

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KSD017



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

Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.

Name: DAN DONELIN

Title: PROFESSOR

Organization: [REDACTED]

Address: [REDACTED]

City: [REDACTED] State: KS Zip Code: [REDACTED]

Comments:

1| 15.4 *Everyone talks about the economic benefit this will bring to the state of Kansas and Manhattan. However, since livestock is one of the states prized economic contributors, what would a pandemic case of hoof and mouth disease do to the economy and people of Kansas.*

2| 24.1
3| 25.4 *Please keep the NBA-DF on Plum Island. and/or keep it the hell out of Kansas!*

(Continued on back for your convenience)

Comment No: 1 Issue Code: 15.4
 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. The risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 billion in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

Comment No: 2 Issue Code: 24.1
 DHS notes the commenter's support for the Plum Island Site Alternative.

Comment No: 3 Issue Code: 25.4
 DHS notes the commenter's opposition to the Manhattan Campus Site Alternative.

Donelin, Latane

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KSD021



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

Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.

Name: Latane Donelin

Title: Land Planner / Community Resident

Organization: _____

Address: _____

City: _____ State: Ks Zip Code: _____

Comments:

1| 25.4 After reading, and listening to material about having this type of facility and especially after talking with a local vet (for my horses), I am opposed to the location of this facility in Manhattan, Kansas.

2| 15.4 It is NOT in the best interest of the people, land or animals within the state of Kansas - nor its economic well-being.

3| 24.1 It (this facility) should remain where it is presently located on Plum Island and it is disappointed to have expended so much funding in reviewing any other location.

4| 5.1 Please update this facility at the Plum Island location and do not destroy other locations.
Thank you!

(Continued on back for your convenience)

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 15.4
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. The risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 billion in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

Comment No: 3 Issue Code: 24.1
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of upgrading the Plum Island facility. Upgrading the existing facility was considered but dismissed as a reasonable alternative based on the age of the facility, its inability to support a BSL-4 laboratory and animal space, and cost as discussed in Section 2.4.1 of the NBAF EIS. Siting the proposed NBAF on Plum Island is one of the six action alternatives under consideration.

Comment No: 4 Issue Code: 5.1
DHS notes the commentor's support for the Plum Island Site Alternative.

Dorman, Esq., Mary

Page 1 of 1

MD0116

Mary D. Dorman
Attorney At Law

154 West 26th Street
Suite 902
New York, N.Y. 10001
Tel: 646-230-7444
Fax: 646-230-7381
Email: counselors@mindspring.com

August 12, 2008

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

Re: Plum Island, NY

Dear Mr. Johnson:

I have a residence in Orient Point, NY on Cedar Birch Drive, less than one-half mile from the Point.

1| 25.1 | The idea that the United States Government would consider establishing an upgrade of a Biological Defense Research facility on Plum Island is absurd. In the event of any mishap at such facility, the entire population of Orient and Orient Point, including flora and fauna, would be imperiled.

2| 13.1 |

3| 19.1 | There is no avenue of escape or evacuation.

4| 21.1 | No matter what assurances human beings can make about the safety of any potentially dangerous facility, unforeseen circumstances cause accidents. Particularly with the undeniable, increasingly violent and unpredictable weather, Plum Island is a poor choice.

cont. | 1| 25.1 | I urge the Government to move the facility to an area that is able to be more easily contained than Plum Island.

Very truly yours,

Mary D. Dorman, Esq.

MDD: jfm
cc: The Suffolk Times

Comment No: 1 Issue Code: 25.1

DHS notes the commentor's opposition to the Plum Island Site Alternative.

Comment No: 2 Issue Code: 13.1

DHS notes the commentor's concern regarding the effects of an accidental release on flora and fauna. Plant diseases would not be studied at the NBAF; and therefore, there is no known potential for adverse effects on local flora. There could be unintended side effects to plants from spraying or other events used to mitigate the spread of a pathogen release. The loss of insect pollinators in the immediate vicinity of the NBAF could have a short-term adverse effect on some species of flowering plants. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9 of the NBAF EIS. Although the NBAF EIS acknowledges the potential for significant wildlife impacts 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: 3 Issue Code: 19.1

The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Plum Island Site Alternative is provided in Section 3.11.6 of the NBAF EIS. An emergency response plan, which would include area evacuation plans, would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations. Evacuation would not be needed in case of an accidental release of the FMD as FMD is not a public health concern.

Comment No: 4 Issue Code: 21.1

DHS notes the commentor's concern regarding the potential consequences from a NBAF accident or pathogen release 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. Appendix B of the NBAF EIS provides a comprehensive list of BSL-3 and BSL-4 laboratory accidents results, and consequences of the accidents 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. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

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

Dormer, Mary

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WD0682

From: Mary Dormer [REDACTED]
Sent: Monday, August 25, 2008 9:26 AM
To: NBAFProgramManager
Subject: NBAF

Program Manager,

1|24.4;
2|8.4
Just a note to let you know that I would fully support tax dollars going into such a facility in Kansas, an ideal location. I'd like to see Kansas continue its growth in the biosciences. The University of Kansas has already earned its reputation as a research center in bioengineering, and Kansas State University needs an opportunity to enhance its already acclaimed research in bio-agro. Two major universities working for the health and safety of our nation can produce nothing short of miracles.

--Mary Dormer
High school teacher

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Comment No: 1 Issue Code: 24.4

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

Comment No: 2 Issue Code: 8.4

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

Dorminey, Blair**Page 1 of 1**

WD0877

From: Blair Dorminey [REDACTED]
Sent: Tuesday, August 26, 2008 12:00 AM
To: NBAFProgramManager
Subject: No to NBAF in Athens

1| 25.2 | Dear NBAF Program Manager,

I have previously expressed in a scoping meeting my opposition to siting NBAF in Athens, Georgia. By this email, I simply wish to reaffirm my opposition, to raise a question and briefly make a few points:

2| 5.1 | In my opinion, if NBAF is needed, it should be built on Plum Island. I see no indication that DHS has ever answered the Government Accountability Office findings that DHS does not have evidence to show that NBAF can be safely sited on the mainland.

3| 4.2 | I also understand indirectly from a DHS source that the cost estimates presented by DHS for construction of NBAF on Plum Island contain the cost of operating the current Plum Island facilities while NBAF is under construction, and that these operating costs are not included in the cost estimates for construction of NBAF at other sites. If this is true, the selection process is unfairly skewed against the Plum Island site. The comparison is one of apples and oranges.

1 cont.| 25.2 | If Athens is chosen as the site, Athens will, in my opinion, be riven by the issue for years to come. Other potential sites, excepting perhaps Butner, are more likely to offer community acceptance of NBAF.

I urge you to build NBAF on Plum Island, and, in any event, not in Athens.

Sincerely,

Blair Dorminey

[REDACTED]
 Georgia
 [REDACTED]

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 5.1

DHS notes the commentor's support for the Plum Island Site Alternative. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species. As described in Section 2.3.1, DHS's site selection process incorporated site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or sem-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 3 Issue Code: 4.2

DHS notes the commentor's concern. The construction cost estimates for the Plum Island Site Alternative do not include costs to operate the current PIADC facility. Construction cost estimates at the Plum Island Site Alternative are higher than the mainland sites because it has a higher cost factor due to the remoteness of accessing the island. This cost factor was determined based on past and current construction project costs at Plum Island. Please refer the Site Cost Analysis that is available from the NBAF website for more information on how the construction costs were estimated.

Dorsett, William

Page 1 of 1

PD0118

August 20, 2008

Yes,

1|25.4; My name is Bill Dorsett. I'm from ██████████ Kansas. I very strongly oppose the
4|17.4 location of the NBAF lab in Manhattan, Kansas. Probably only because of the very high level of traffic that's in and around Kansas State University and the site.

2|21.4 Many times a year, both for football and basketball, there are...there are tens of thousands of trucks and cars located right around the site. There are major highways and major roads that go right next to the site, well within the parameter of any possible release. And I think it's a tremendously bad location for the location, especially foot and mouth disease, but also of other pathogens. Actually I think any...any site on the mainland is a bad idea.

3|5.0 I think it should be located still on Plum Island or even someplace more remote.

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: 21.4

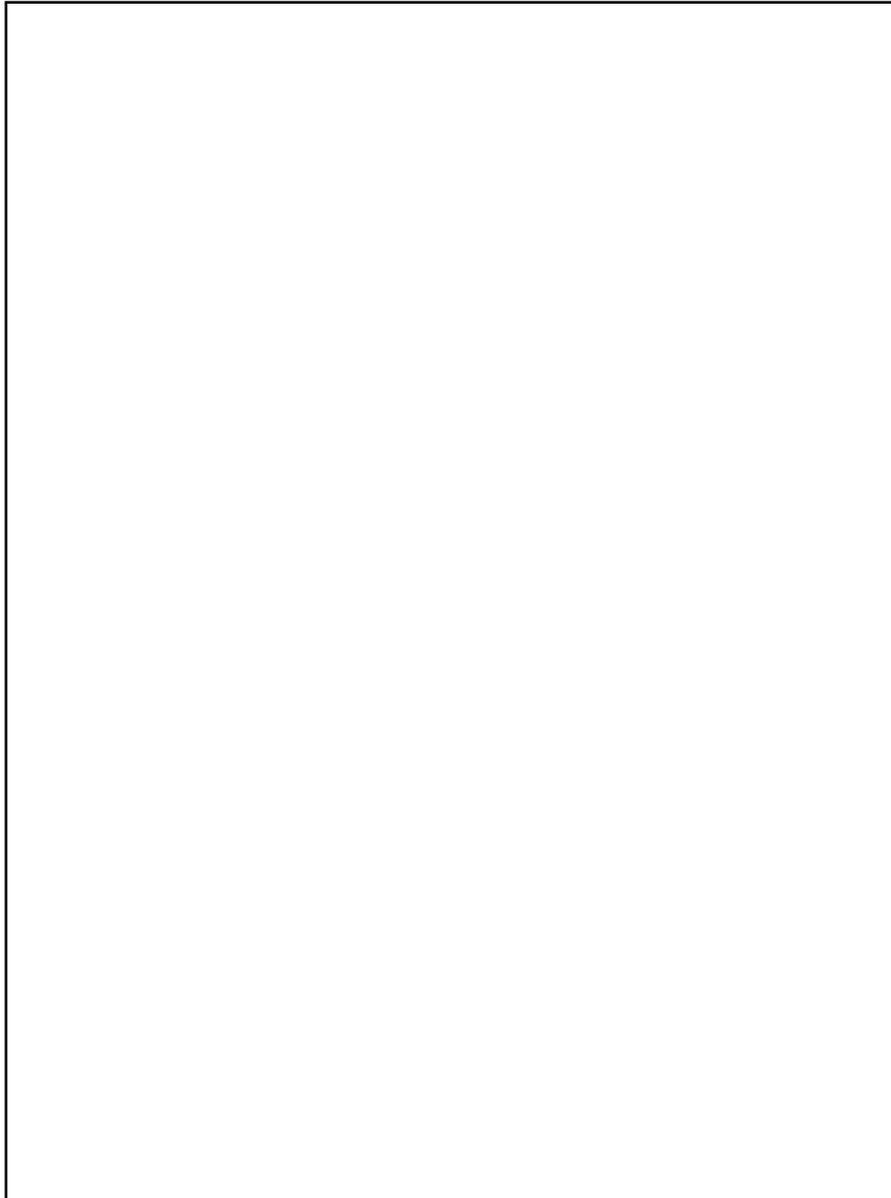
DHS notes the commentor's statement. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release 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. The risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley Fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley Fever virus as the Nipah virus vector is not present in the western hemisphere.

Comment No: 3 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives. As described in Section 2.4. of the NBAF EIS, other alternatives were considered but eliminated from further study. An isolated or desert location was eliminated because the selection criteria included proximity to research capabilities and workforce.

Comment No: 4 Issue Code: 17.4

DHS notes the commentor's concern about whether current and future KSU events and activities have been factored into the traffic and transportation planning for the major corridors serving the NBAF operation at the Manhattan Campus Site Alternative. A discussion of the planned improvements to the primary transportation corridor that will serve the NBAF operation is located in Section 3.11.4.3.1 of the NBAF EIS and is based in part on the KSU master plans through the year



2030. DHS will add the following language to the NBAF EIS to better clarify this issue: "The recommended improvements are based on the analysis of future traffic demand as well as future Kansas State University campus master plans through the year 2030". An emergency response plan, to include evacuation routes, would be developed if one of the action alternatives is selected and prior to commencement of operations.

Doster, Gary

Page 1 of 1

WD0597

From: Gary Doster [REDACTED]
Sent: Sunday, August 24, 2008 7:43 AM
To: NBAFProgramManager
Subject: NBAF Comment

1|24.2 You may hear from many individuals who are opposed to the National Bio- and Agro-Defense Facility being located in Athens, Georgia, but I assure you that there are a great many more people here who are in favor of it that who are opposed. It would be a wonderful addition to our community and we would welcome it. Please give us the most serious consideration. Thank you, Gary L. Doster, [REDACTED] Georgia

Comment No: 1 Issue Code: 24.2
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

Douglas, Michael

Page 1 of 3

FD0095

State of North Carolina
Department of Environment and Natural Resources

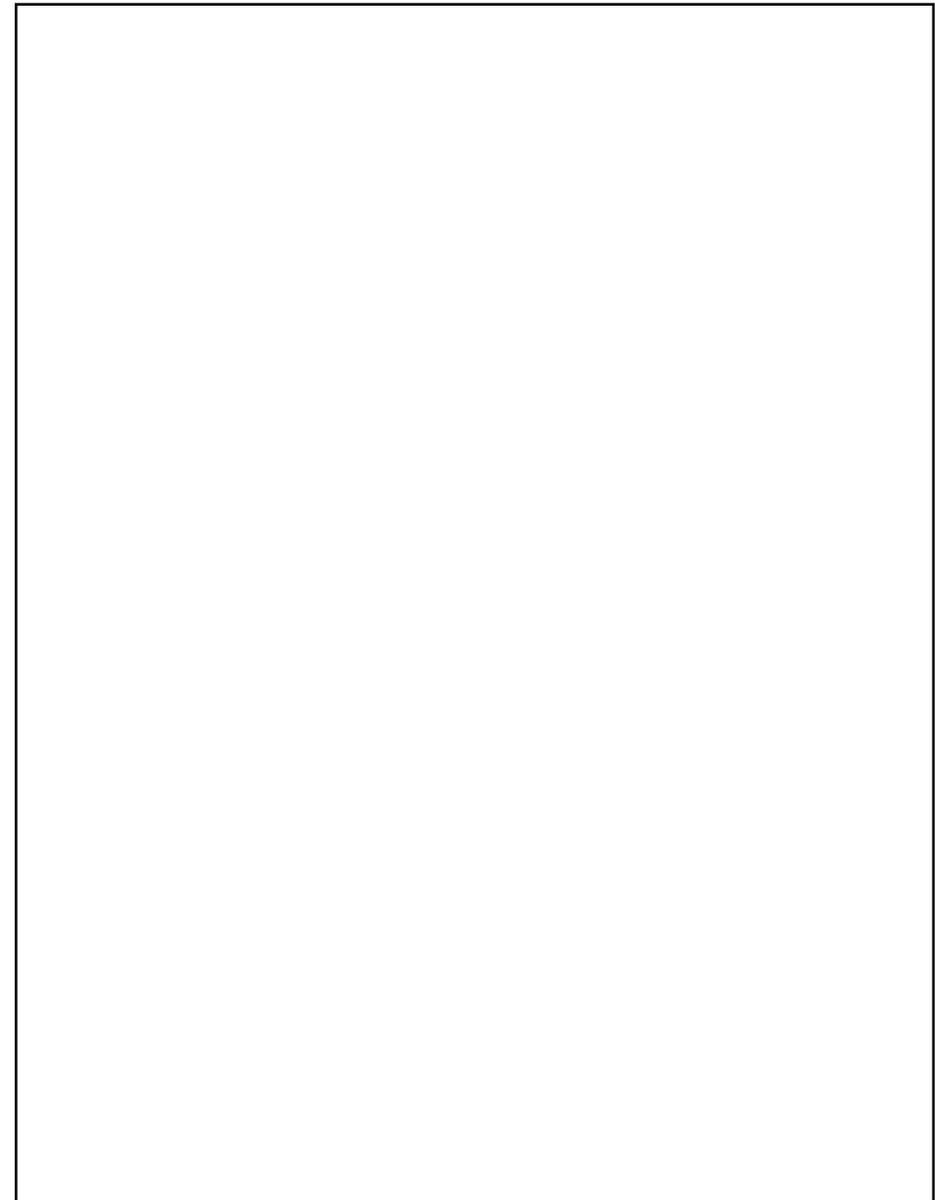
Reviewing Office: Eastern Regional Office

Project Number: 07396 Due Date: _____

GOVERNMENTAL REVIEW - PROJECT COMMENTS

View of this program has been determined that the EIR, permit(s) and/or approvals indicated may need to be obtained in order for this project to comply with North Carolina law. Questions regarding these permits should be addressed to the Regional Office indicated on the reverse of the form. All applications, information and guidelines to these plans and permits are available from the same Regional office.

PERMITS	SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Permit Turn (calendar time limit)
Permit to construct & operate wastewater treatment plant, sewer system, collection & sewer system or discharging into state surface waters.	Application 90 days before begin construction or award of construction contract. On-site inspection. Post-application technical conference usual.	30 days (90 days)
NPDES - permit to discharge into surface water and/or permit to operate and construct wastewater facilities discharging into state surface waters.	Application 180 days before begin activity. On-site inspection. Pre-application conference usual. Additionally, obtain permit to construct wastewater treatment facility/growth after NPDES Reply type. 30 days after receipt of plans or plans of NPDES permit/whichever is later.	90-120 days (N/A)
Water Use Permit	Pre-application technical conference usually necessary.	30 days (N/A)
Well Construction Permit	Complete application must be received and permit issued prior to the construction of a well.	7 days (15 days)
Drainage and Fill Permit	Application copy must be served on each adjacent riparian property owner. On-site inspection. Pre-application conference usual. Filling may require agreement to fill from N.C. Department of Administration and Natural Resources and Fill Permit.	55 days (90 days)
Permit to construct & operate Air Pollution Abatement facilities under Emission Guidelines per 15 A NCAC 2D.0180 (rev 2/2/05)	Application must be submitted and permit received prior to construction and operation of the source. If a permit is required in an area without local zoning, then there are additional requirements and timelines (2D.0113).	90 days
Permit to construct & operate Transportation Facility as per 15 A NCAC 2D.0400, 2D.0401	Application must be submitted at least 90 days prior to construction or modification of the source.	90 days
Any open burning associated with subject proposal must be in compliance with 15 A NCAC 2D.1900	N/A	90 days (90 days)
Removal of record of all structures containing asbestos must be in compliance with 15 A NCAC 2D.1114 (1) which requires notification and removal prior to demolition. Contact Asbestos Control Group 919-797-5927	N/A	
Complete Source Permit required under 15 A NCAC 2D.0900	N/A	
The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land clearing activity. An erosion & sedimentation control plan will be required if new or more severe to be disturbed. Plan filed with proper Regional Office (Land Quality Section) At least 30 days before beginning activity. A fee of \$625 for the plan size or any part of the same. An express review option is available with additional fees.		30 days (30 days)
Design and installation of appropriate perimeter sediment trapping devices as well as stable sediment conveyance and outlet.	On-site inspection usual. Runoff bond filed with ENR bond amount varies with type site and number of acres of disturbed land. Any are mineral greater than one acre must be purchased. The appropriate bond must be received before the permit can be issued.	30 days (30 days)
Mining Permit	On-site inspection by N.C. Division Forest Resources if permit exceeds 4 days	1 day (N/A)
North Carolina Burning permit	On-site inspection by N.C. Division Forest Resources required if more than five acres of ground disturbing activities are involved. Inspections should be requested at least ten days before actual burn is planned.	1 day (N/A)
Special Ground Clearance Burning Permit - 22 counties in eastern N.C. with organic soils	N/A	90-120 days (N/A)
Oil Refining Facilities	If permit required, application 60 days before begin construction. Applicant must hire N.C. qualified engineer to prepare plans, inspect construction, certify construction is according to state approval plans. May also require facility construction program. And a 604 permit from Coast of North Carolina. An inspection of site is necessary to verify Hazard Classification. A permit under separate consent program. And a 604 permit from Coast of North Carolina. An inspection of site is necessary to verify Hazard Classification. A permit under separate consent program. And a 604 permit from Coast of North Carolina. An inspection of site is necessary to verify Hazard Classification.	30 days (60 days)
Dam Safety Permit		



Aug 25 2008 11:11 P.02

NCDA
Fax: [redacted]
NCDA

Douglas, Michael

Page 2 of 3

FD0095

PERMITS	SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Process Time (Temporary time limit)
<input type="checkbox"/> Permit to drill exploratory oil or gas well	File survey report of \$5,000 with BNA, pending to State of NC conditional that any well opened by drill operator shall, upon abandonment, be plugged according to ENR rules and regulations.	10 days N/A
<input type="checkbox"/> Geophysical Exploration Permit	Application filed with BNA at least 10 days prior to issue of permit. Application by letter. No standard application form.	10 days N/A
<input type="checkbox"/> State Lease Construction Permit	Application fees based on structure plan is charged. Must include description & drawings of structure & proof of ownership of riparian interests.	15-30 days N/A
<input checked="" type="checkbox"/> 401 Water Quality Certification	N/A	60 days (120 days)
<input type="checkbox"/> CAMA Permit for MAJOR development	\$250.00 fee must accompany application	25 days (150 days)
<input type="checkbox"/> CAMA Permit for MD-QR development	\$40.00 fee must accompany application	25 days (25 days)
<p><input type="checkbox"/> Several general provisions are located in or near the project area. If any monument needs to be moved or destroyed, please notify: N.C. Geologic Survey, Box 17487 Raleigh, NC 27617</p>		
<p><input type="checkbox"/> Abandonment of any wells, if required must be in accordance with Title 15A, Subchapter 2C.0100.</p>		
<p><input type="checkbox"/> Notification of the proper regional office is requested. If "traps" underground storage tanks (USTs) are discovered during any exploratory operations.</p>		
<p><input type="checkbox"/> Compliance with 15A, NCAC 21A 1000 (Quality Standards Data) is required.</p>		
<p><input type="checkbox"/> The Rules of Noise Riparian Buffer Rules required.</p>		
<p><input type="checkbox"/> Other comments (attach additional pages as necessary, being certain to cite comment numbers)</p>		

REGIONAL OFFICES

Questions regarding these permits should be addressed to the Regional Office marked below.

- Asheville Regional Office
2090 US Highway 70
Swannanoa, NC 28778
(828) 296-4500
- Mooresville Regional Office
610 East Center Avenue, Suite 301
Mooresville, NC 28115
(704) 663-1699
- Wilmington Regional Office
127 Cardinal Drive Extension
Wilmington, NC 28405
(910) 796-7215
- Fayetteville Regional Office
225 North Green Street, Suite 714
Fayetteville, NC 28301-5045
(910) 453-3300
- Raleigh Regional Office
3800 Barrett Drive, Suite 101
Raleigh, NC 27609
(919) 791-4200
- Winston-Salem Regional Office
585 Waughtown Street
Winston-Salem, NC 27107
(336) 771-5000
- Washington Regional Office
943 Washington Square Mall
Washington, NC 27889
(252) 946-6481

Douglas, Michael

Page 3 of 3

FD0095

DEPARTMENT OF ENVIRONMENT AND
NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL HEALTH

Inter-Agency Project Review Response

Project Name: US Department of Homeland Security Type of Project: EA for Umstead Research Farm at Fort Belvoir for the construction/operation of the National Bio & Agri Defense Facility

Project Number: 08-0390
County: Granville

Comments provided by:

Regional Program Person

Regional Supervisor for Public Water Supply Section

Central Office program person

Name: Michael Douglas RO Date: 07/08/2008

Telephone number: [REDACTED]

Program within Division of Environmental Health:

Public Water Supply

Other, Name of Program: _____

Response (check all applicable):

No objection to project as proposed

No comment

Insufficient information to complete review

Comments attached

See comments below

18.3 If project is built in N.C., comments will be provided on the water supply needs and construction of water mains to serve the facility

Return to:
Public Water Supply Section
Environmental Review Coordinator for the
Division of Environmental Health

APPROVED

Comment No: 1 Issue Code: 8.3

DHS acknowledges commentor's plan to provide comments on the NBAF potable water requirements and infrastructure in the event the Umstead Research Farm Site Alternative is selected by DHS.

Douglas, Rick

Page 1 of 1

PD0147

August 21, 2008

Hello, my name is Rick Douglas. I live in the [REDACTED] area. I'm calling in support of the ...the facility that is proposed to...or being considered I should say, going into the Flora, Mississippi area. I moved here in 2002 with the Nissan...Plant, the Nissan Plant here in [REDACTED] Mississippi and I have been very impressed with the community support. With such an endeavor I would be very comfortable in saying that from my standpoint and my experience here in the Mississippi for the last six years this would be a very good boost for the community and be very well supported. There are plenty of people with, with the qualifications to work in such a facility. The quality of life here is very well and I think that Mississippi would be, would be very happy to bring the new jobs in from such a facility.

1| 24.5

I just wanted to express my support for the program and I hope you guys will decide to build it here.

Thank you a lot.

Comment No: 1

Issue Code: 24.5

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

Downey, CHMM, CSP, John

Page 1 of 1

WD0807

From: John Downey [REDACTED]
Sent: Monday, August 25, 2008 5:15 PM
To: NBAFProgramManager
Subject: National Bio and Agro-Defense Facility

Dear Sir/Madam:

1| 5.4 | I wanted to take a minute to write to you in support of locating the National Bio and Agro-Defense Facility in the State of Kansas. I am a graduate of [REDACTED] and I have lived in the Kansas communities of [REDACTED]. I can speak first-hand as to the caliber of the citizens of my State. Our State offers a very high quality of life paired with a low cost of living, and these aspects were attractive to me when I made my decision to relocate my family to Kansas. I can't help but think that these qualities will be attractive to the scientists and other researchers who you will hope to retain as part of your program. In fact, I know that the Federal government, the Department of Homeland Security, and all citizens of the United States will be proud in future years of the efforts and successes of the biological and agricultural defense program if the Facility is situated in Kansas.

Best regards,
John

John A. Downey, CHMM, CSP
Occupational Health and Safety Engineer

[REDACTED]

Comment No: 1 Issue Code: 5.4
DHS notes the commentor's support for the Manhattan Campus Site Alternative.

Doyle, Stu

Page 1 of 1

WD0212

From: Stu Doyle [REDACTED]
Sent: Friday, August 08, 2008 10:27 AM
To: NBAFProgramManager
Subject: Kansas is the only choice

1| 24.4 | I am writing to join the many Kansans who are in favor of the National Bio and Agro-Defense Facility be
2| 8.4 | relocated in Manhattan, Kansas. This facility is first wanted by the people of Kansas and in particular
3| 15.4 | Manhattan. It will be located in an area that is surrounded by agro-professionals who know what great
work the NBAF does and will continue to do. Secondly it will be in close proximity to Kansas State
University who on its own is a great leader in agriculture and most recently gained the Biosecurity
Research Institute located in Pat Roberts Hall. Together these facilities will be able to share research that
will be a benefit to the entire country. Thirdly, the people of Kansas welcome this facility as a new source
of income to the state. Other areas of the country have turned against the NBAF but the Kansas people
are behind this opportunity 100 per cent.

cont| 1| 24.4 | I am proud to see a state that will take on a program such as the NBAF and welcome it with open arms.

Stu Doyle
Security Consultant
[REDACTED]

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For alternate languages please go to [REDACTED]

Comment No: 1 Issue Code: 24.4

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

Comment No: 2 Issue Code: 8.4

DHS notes the information provided by the commentor.

Comment No: 3 Issue Code: 15.4

DHS notes commentor's opinion. The economic effects of the NBAF at the Manhattan Campus Site are included in Section 3.10.4. of the NBAF DEIS. Labor income generated during the construction phase of the NBAF is estimated at approximately \$138 million while operation of the NBAF would generate approximately \$29 million in wages annually. State and local taxes generated during the construction phase are estimated at \$12.5 million while State and local taxes generated during the operation of the NBAF are estimated at approximately \$1.5 million annually.

Drake, Denise

Page 1 of 1

WD0440

From: Drake, Denise K [REDACTED]
Sent: Wednesday, August 20, 2008 10:58 PM
To: NBAFProgramManager
Subject: NBAF -- Kansas
Sensitivity: Confidential

1| 24.4 I am an [REDACTED] Kansas resident by way of Iowa and Missouri. I thought I might drop you a quick line of encouragement in support of my state -- the National Bio and Agro-Defense Facility could not find a better home than Kansas. Our state is uniquely qualified to help NBAF meet all its goals and objectives.

Thank you for your sincere consideration.

Denise K. Drake
[REDACTED]

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Comment No: 1

Issue Code: 24.4

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

Dressler, Daphne and Richard

Page 1 of 1

WD0631

From: [REDACTED]
Sent: Saturday, August 23, 2008 10:21 AM
To: NBAFProgramManager
Subject: Plum Island

1/25.1 We are residents of [REDACTED] CT and are very concerned about raising the BSL level to BSL-4. There have been documented articles recently that neighbors have shared linking the start of lyme disease to experiments that were conducted on the island years ago.

This island is just too close to such a densely populated area of CT and Long Island, NY.

Daphne and Richard Dressler

It's only a deal if it's where you want to go. Find your travel deal [here](#).

Comment No: 1 Issue Code: 25.1

DHS notes the commentor's opposition to 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. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

Drewry, Catherine Bowen

Page 1 of 1

WD0415

From: Drewry [REDACTED]
Sent: Wednesday, August 20, 2008 2:30 PM
To: NBAFProgramManager
Subject: nbaf in Athens GA

To whom it may concern:

1|24.2 | I am writing to voice my support for the NBAF to be built in Athens, GA. I have followed the local newspaper coverage, and attended last week's public meeting. I think the value of this facility for the greater good of all creation far outweighs the risk of harm. In fact, I think the risk of harm is much greater without this facility - that is, of course, why it should be built! And, I think this area is the place to put it. We can provide what is needed for it to succeed, and it can help our area.

2|5.2 | I understand all the many good reasons why Athens was chosen as a potential site. I don't understand why the committee chose the particular tract that it did, knowing that it's proximity to the Botanical gardens could raise hackles of many. I'm all for it, but I think some of the dissent from residents could have been avoided with a less sensitive site, still in this area.

I was born in [REDACTED] and have lived my 46 years in [REDACTED]. I have a bachelor of science in horticulture, and work part time as a garden designer. My other part time job is as director of Children's Ministry for my church. My father raises beef cattle here. My husband, son, and I live on the family farm. I consider myself to be an environmentalist.

Sincerely,
Catherine Bowen Drewry
[REDACTED] GA [REDACTED]

Comment No: 1 Issue Code: 24.2

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

Comment No: 2 Issue Code: 5.2

DHS notes the commentor's opinion regarding the proximity of the South Milledge Avenue Site Alternative to the Botanical Garden.

Dreyfors, Marc

Page 1 of 1

WD0745

From: Marc Dreyfors [REDACTED]
Sent: Monday, August 25, 2008 2:36 PM
To: [REDACTED]
Cc: NBAFProgramManager
Subject: Re: Granville County Home and Small Business Owner opposing NBAF proposal

Hi,

1|25.0 | Maybe they could outsource it to a third world nation, like America's
 torture programs ("America does not torture/experiment on biological
 weapons?"), or maybe privatize it to an Arab nationalized company, like
 the ports deal(wonder if the guy who proposed it got canned, like
 Douglas Fief or Wolfowitz should have).

DHS is a dangerous oxymoronic joke, they can't even secure our chemical and nuclear plants!

Marc Dreyfors
President,
[REDACTED]

2|25.3 | PCH Winfield wrote:
 > Hello, I spoke at a Raleigh City Council meeting back in November 2007
 > giving some of my safety concerns with the proposal to place a NBAF
 > site in Butner. I have read and researched more since November, but
 > still oppose the proposal on safety grounds.
 >
 > I do not think this type of research should be done near the primary
 > water supply of the state capitol of North Carolina. Were an accident
 > or act of terrorism to occur at such a site, the potential risk to
 > human and animal life is enormous.
 >
 > Sirs, if you must perform this type of germ research, please consider
 > remote desert or small-island locations far from continental US
 > population centers. Thank you for your consideration!
 >
 >

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

Comment No: 1 Issue Code: 25.0
DHS notes the commentor's statement.

Comment No: 2 Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Dunaway, Karen

Page 1 of 1

WD0281

From: KAREN DUNAWAY [REDACTED]
Sent: Friday, August 15, 2008 10:54 AM
To: NBAFProgramManager
Subject: proposed bio lab in Flora, MS

1|24.5; I support the building of the proposed bio lab in Flora, MS, provided that all environmental
2|15.5 precautions are taken. This would provide much needed economic opportunity to west-central
Mississippi.

Karen Dunaway
[REDACTED]
[REDACTED] MS [REDACTED]

Comment No: 1 Issue Code: 24.5
DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

Comment No: 2 Issue Code: 15.5
DHS notes the commentor's support for the Flora Industrial Park Site Alternative. The economic and quality of life effects of the NBAF at the Flora Industrial Park Site Alternative are included in Section 3.10.5 of the NBAF EIS.

Duncan, York

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PATTON BOGGGS LLP
ATTORNEYS AT LAW

FD0077

2550 M Street, NW
Washington, DC 20037
202-457-6000
Facsimile 202-457-6316

To: **James V. Johnson**

Company: **U.S. Department of Homeland Security
Science and Technology Directorate**

Fax Number: **1-866-508-6223**

Phone Number:

Total Pages

Including Cover: **11**

From: **James A. Reeder**

Sender's Direct Line: **202-457-5616**

Date: **August 25, 2008**

Client Number:

Comments:

Mr. Johnson,

We have enclosed the TRF comments on the Environmental Impact Statement (EIS). We hope these prove useful to you.

Sincerely,
James A. Reeder

WASHINGTON DC
NORTHERN VIRGINIA
NEW JERSEY
NEW YORK
DALLAS
DENVER
ANCHORAGE
DOHA, QATAR

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Duncan, York

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FD0077



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 John Kerr
 H. Drake Leddy 1|4.6;
 Milton B. Lee 2|26.0
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 Robert Price
 Ricardo Romo, Ph.D.
 Hendrick Rusik, Ph.D.
 Herb J. Spator
 David Spencer
 Eric Stephens
 James Summers 3|24.6;
 Kenneth L. Wilson 2 Cont. | 26.0
 John B. Zachry

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August 25, 2008

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

Dear Mr. Johnson:

The Texas Research & Technology Foundation, owner of the Texas Research Park (TRP) in San Antonio, a member of the Texas Bio- and Agro-Defense Consortium (TBAC), appreciate the opportunity to submit written comments during this public review and comment period for evaluation of siting alternatives for the construction and operation of a proposed National Bio- and Agro-Defense Facility (NBAF). The process followed to date, including the presentations, discussions and materials provided and disseminated during the Public Meetings, demonstrates that the EIS and the associated agency review will be thorough and well informed. To assist you in this process, and to re-emphasize our strong opinion that the TBAC submission provides the site that best serves the national, agency and community interests articulated in the initial Department of Homeland Security (DHS) Public Notice, the NBAF EIS Scoping Report and the Draft EIS, we submit the following comments for consideration and inclusion in the EIS review process. Thank you for the careful consideration the DHS is giving this important effort, and for your service in this process that is crucial to the national security of the United States.

General Overview

It is critical to note that the distinguishing comparative strengths of the proposed Texas site fall precisely into the areas identified as the primary evaluation criteria for this selection process.

(1) Proximity to Research Capabilities. The site has close proximity to high level research capabilities, and is in fact the only site under consideration with experience in operating a BSL-4 lab. The Southwest Foundation for Biomedical research (SFBR) has operated the nation's only privately owned BSL-4 lab since 2000 with an impeccable safety record. Also nearby is the Texas A&M University, with its College of Veterinary Medicine and Biomedical Sciences, one of the top five in the

4|6.6;

14815 Omicron Drive, Suite 100
 San Antonio, Texas 78245-3201
 Tel: (210) 674-4177 • Fax: 677-0335
 www.trpf.com

Comment No: 1 Issue Code: 4.6

DHS notes the commentor's statement.

Comment No: 2 Issue Code: 26.0

DHS notes the information submitted by the commentor.

DHS notes the commentor's statement. "Manhattan Campus Site" has been replaced with "Texas Research Park Site".

Comment No: 3 Issue Code: 24.6

DHS notes the commentor's support for the Texas Research Park Site Alternative. The decision on whether or not the NBAF is built, and, if so, where will be made on the four evaluation criteria addressed in addition to the following factors: analyses from the EIS; applicable federal, state, and local laws and regulatory requirements; consultation requirements from the federal, state, and local agencies, as well as federally recognized American Indian Nations; policy considerations; and public comment.

Comment No: 4 Issue Code: 6.6

DHS notes the commentor's statement.

DHS notes the commentor's statement. The text has been amended to "The proposed NBAF site is owned by the Texas Research & Technology Foundation, a 501(c)(3) non-profit organization."

DHS notes the commentor's statement. The text in Section 3.5.8.2 has been amended to coincide with Section 3.2.8.1.

Duncan, York

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*Mr. James V. Johnson, Department of Homeland Security
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August 25, 2008*

4 Cont. | 6.6. Nation. Texas A&M is the lead institution for the DHS National Center for Foreign Animal and Zoonotic Disease Center (FAZD). In addition, the University of Texas Medical Branch at Galveston will begin operations later this year in the new NAIAD National Biocointainment Center.

6 | 15.6 (2) Proximity to Workforce. The site offers the substantial advantage of proximity to an available and supportive workforce, which is well trained and experienced for the full range of employment needs, including a specialized workforce ranging from animal handlers and related workers to PhDs that are readily available to fill jobs at the NBAF.

5 | 8.6 (3) Acquisition, Construction and Operations. The site offers significant benefits in terms of acquisition, construction and operations objectives, as the Texas Research Park is well organized and endowed with the real estate and resources to fully accommodate the proposal and to anticipate future growth. The Texas Research & Technology Foundation, owner of the Texas Research Park, will convey the site at no cost to DHS. Please refer to NBAF Site Cost Analysis, Page 7 | 23.6 5, Section 2.2 San Antonio, Texas has the lowest cost factor for construction.

3 Cont. | 24.6 (4) Community Acceptance. Most significantly, the TRP site has received community acceptance far surpassing that of the other proposed alternative sites. In fact, this proposal enjoys overwhelming support from the local communities and political leadership.

8 | 19.6 In addition to the above four primary evaluation criteria, the Texas site benefits from several other attributes including superior rapid response and crisis management resources. Three Level 1 Trauma Centers are located in San Antonio in proximity to the proposed NBAF site. None of the other sites under consideration is located in a city with a Level 1 Trauma Center. In fact, no Level 1 Trauma Centers exist in the States of Mississippi and Georgia - whereas the State of Texas has ten.

9 | 11.6 Furthermore, San Antonio has the least potential for catastrophic weather or geological event of any of the alternatives under consideration.

10 | 20.6; 6 Cont. | 15.6 With regard to cultural diversity, as a percentage of total population, San Antonio has a minority population as large, or larger, than any other metropolitan area in the nation. This population is fully integrated into the community and its day to day life. San Antonio's diverse population has been said to reflect America. Please see support letters from the Hispanic Chamber of Commerce and the Alamo

Comment No: 5 Issue Code: 8.6

DHS acknowledges commentor's identification of new information pertaining to the air quality of Bexar County and the sanitary sewage system infrastructure for the NBAF operation at the Texas Research Park Site Alternative. DHS will document, review and incorporate all appropriate new and/or revised information for the NBAF final design.

DHS acknowledges commentor's recommendation for terminology modification and the availability of wind powered electrical generation for the NBAF operation at the Texas Research Park Site Alternative. DHS will document, review and incorporate all appropriate new and/or revised information for the NBAF final design.

DHS notes the commentor's request for changes to the electrical capacity requirements as specified for the redundant operation the NBAF at the Texas Research Park Site. DHS has updated Section 3.3.8 in this NBAF EIS to reflect all new or revised information as appropriately received and documented.

DHS notes commentor's identification of potentially new information pertaining to the natural gas delivery system infrastructure for the NBAF operation at the Texas Research Park Site Alternative. DHS has updated Section 3.3.8 in this NBAF EIS to reflect all new or revised information as appropriately received and documented.

DHS notes commentor's identification of an apparent inconsistency regarding use of the term "existing" to describe the "proposed" 8-inch diameter sewer line to the east of the 100.1 acre tract, as located in the second paragraph, first sentence of Section 3.13.9.3 of the NBAF Draft EIS. DHS has modified the NBAF EIS to reflect this correction.

Comment No: 6 Issue Code: 15.6

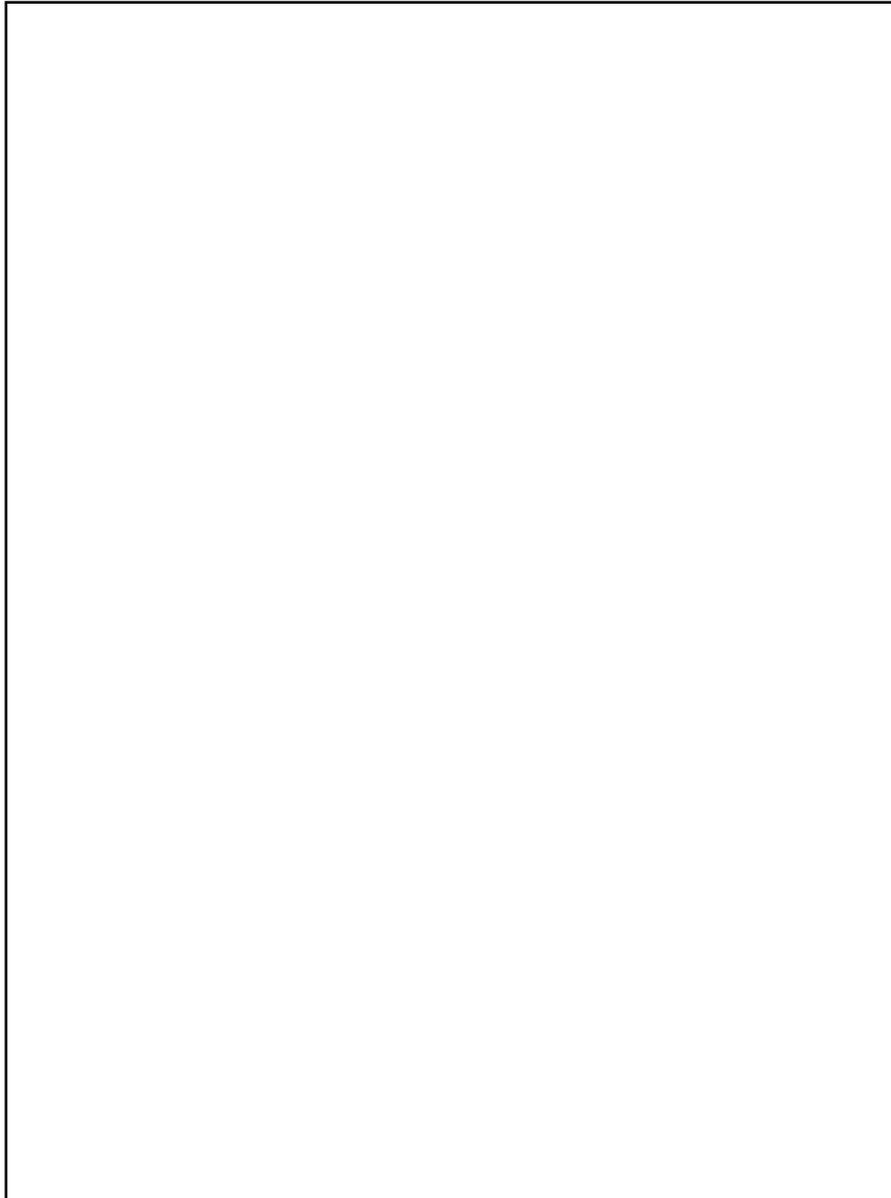
DHS notes the commentor's support for the Texas Research Park Site Alternative. Labor force data and demographic profiles of the region are presented in Section 3.10.8 and Appendix C.

DHS notes the information provided by the commentor.

Comment No: 7 Issue Code: 23.0

DHS notes the commentor's statement.

DHS notes the commentor's identification of an incorrect description of the current land at the Texas Research Park Site in Section 3.5.8.2. The corrected land description of "undeveloped, vacant land, vegetated with live oak clusters and native South Texas brush" has been included in the NBAF Final EIS.



DHS notes the commentor's statement.

Comment No: 8 Issue Code: 19.6

DHS notes the information provided by the commentor.

Comment No: 9 Issue Code: 11.6

DHS notes the commentor's opinion on the alternative sites' rankings in terms of potential adverse weather and geological events.

Comment No: 10 Issue Code: 20.6

DHS notes the commentor's statement. Ethnicity and Race are discussed in Section 3.10.8.1.2.1.1 of the NBAF EIS.

Duncan, York

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FD0077

*Mr. James V. Johnson, Department of Homeland Security
page 3 of 8
August 25, 2008*

City Black Chamber of Commerce.

8 Cont. |19.6 Finally, San Antonio's strong military presence, resources, and capacities, both technical and human, offer the Texas site an invaluable, trained and readily mobilized response asset. Currently home to the Army's Fort Sam Houston and Brook Army Medical Center and the Air Force's Randolph Field and Lackland Air Force Base, the San Antonio area benefits not only from a robust military presence, but a high proportion of the military's specially trained medical personnel, including doctors, nurses, medics, technicians, facility administrators, and veterinarians.

2 Cont. |26.0 In addition to the general comments noted above, which bear special emphasis in your assessment of the comparative capabilities, assets, vulnerabilities and associated impacts relative to the respective site alternatives under your consideration, we also submit the following specific comments regarding some of the technical statements provided in the DEIS.

Specific Comments and Corrections to the DEIS - July 14, 2008

- 5 Cont. |8.6 1. Page 2-32, Table 2.5.1-2. Comparison of Environmental Effects. The table entry for TRP indicates a requirement to install 4.6 miles of new sanitary sewer line to serve the 100.1 acre TRP site. This is incorrect. There is an existing 8" line, with a capacity of approximately 1,000,000 gpd which runs along the north boundary of the 100.1 acre site. A proposed 8" line is planned to be installed on the south boundary of the site that will serve the 100.1 acre site, if required, as well as additional acreage in the TRP. This planned wastewater line will be paid for with Consortium funds committed to the NBAF project. Both of these wastewater lines gravity flow into a 21" main which exits the TRP to the south into the Far West Outfall, to the Medio Creek Water Treatment Plant (WTP). Please refer to the NBAF Site Cost Analysis, Page 16, Section 2.3.4.f. San Antonio Utilities.
- 11|9.6 2. Page 2-33, Table 2.5.1-2. Comparison of Environmental Effects. The table entry for TRP Air Quality indicates that Bexar County is a non-attainment area for ozone. This is incorrect. Bexar County is in attainment as of this date.
- 5 Cont. |8.6 3. Page 3-4, Table 3.1.1.1. Infrastructure and Traffic Improvements. Page 3-4, refers to the incorrect sanitary sewer comments noted in Number 1 above.

Comment No: 11 Issue Code: 9.6

DHS notes the commentor's disagreement with Table 2.5.1-2 and the TRP ozone designation. The Bexar County was redesignated by EPA on 4-2-08 as in attainment for ozone. Section 3.4.8 of the NBAF EIS has been modified to reflect the redesignation.

DHS notes the commentor's statement and the correction has been made in Section 3.4.8.1.2 of the NBAF EIS.

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4. Page 3-27, Section 3.2.8.1.1. Land Use. Page 3-27 provides an incorrect reference to ownership of the site. The NBAF site is owned by the Texas Research & Technology Foundation, a 501(c) (3) non-profit organization.
5. Page 3-27, Section 3.2.8.1.1. Land Use. The land cover description contrasts with the land use description on Page 3-94, 3.5.8.2 Construction Consequences.
6. Page 3-28, Section 3.2.8.1.2. Visual Resources, Page 3-28 suggests high visual impact. The University of Texas Health Science Center has large facilities in close proximity to the NBAF site. To the east approximately one half mile is a large call center, suggesting NBAF would not have a significant visual impact, as facilities of this size are in close proximity. The Research Park itself was designed to accommodate large users.
7. Page 3-53, Section 3.3.8.1.2. Electricity. In paragraph 3, we would recommend the word "substations" be changed to "circuits." CPS Energy, the power supplier, can also provide power from alternative sources, obtaining 14% of its power from wind (windtricity). As a result, NBAF can purchase as much as 100% of its power as windtricity.
8. Page 3-53, Section 3.3.8.1.2. Electricity. In the paragraph 4, we recommend removing the following language:

Text to be removed:

Power from the two substations would be routed to the Texas Research Park Site through two new and separate underground lines within an existing underground electric duct bank running adjacent to Lambda Drive (BSA 2007). The two separate lines would converge at a third electrical substation, to step the voltage down, and distribute the two independent power supplies to the NBAF. The third electrical substation would be located on, or adjacent to, the Texas Research Park Site and would have dual transformers, each with the capacity to handle the entire facility demand as required.

and replace it with the following:

Comment No: 12 Issue Code: 7.6

DHS notes the commentor's statement.

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Text to be added:

5 Cont.] 8.6

Power to the site will consist of two diversely routed 35kV circuits. These circuits will originate from different transformers at the CPS Energy substation located adjacent to Texas Research Park. The two separate lines would converge at the site and will be stepped down to customer voltage by two transformers each capable of carrying the entire facility load.

9. Page 3-53, Section 3.3.8.1.3. Fuels and Natural Gas. Page 3-53 indicates that there is an existing 4" natural gas line along Lambda Drive. The document fails to mention an existing 4" line along the north boundary of the 100.1 acre site. Please refer to NBAF Site Cost Analysis, Page 16, Section 2.3.4.f San Antonio, Texas Utilities. In addition, in the NBAF Site Cost Analysis, Page 13, the natural gas rate for San Antonio is \$8.80/MCF.
10. Page 3-54, Section 3.3.8.1.4. Sanitary Sewage. The TRP site is included within the limits of the Concord Oil-Briggs Ranch sewer contract. This contract reserves sewer capacity for a 4,000-acre block of land generally paralleling Hwy 211. This contract is in effect and will expire in 2011. There are existing sewer mains serving the TRP that have adequate capacity to serve the expected needs of the project. Currently, all generated sewer flows from the TRP and the proposed NBAF site would be treated at the Medio Creek Water Recycling Center (WRC). San Antonio Water System masterplans include the construction of an additional outfall main that will direct all of the generated sewer flows from developments outside of Loop 1604 to the Dos Rios WRC. This additional outfall main is projected to be completed in the 2013-2014 time period. Please refer to NBAF Site Cost Analysis, Page 16, Section 2.3.4.f.
11. Page 3-55, Section 3.3.8.3.1. Potable Water Supply. The proposed Stevens Ranch WPF is expected to be in service during the summer of 2008. This will provide a second water source and elevated storage for the TRP development and NBAF.
12. Page 3-56, 3.3.8.3.4. Sanitary Sewage. The description in the second paragraph is incorrect. See Comments numbered 1 and 10 above.
13. Page 3-83, 3.4.8.1.2. Air Quality. The Camp Bullis monitoring station

Comment No: 13

Issue Code: 12.6

DHS acknowledges commentor's identification of new information pertaining to the future capacity of the potable water system infrastructure for the NBAF operation at the Texas Research Park Site Alternative. If appropriate, the EIS will be modified once new information is evaluated. DHS will document, review and incorporate all appropriate new and/or revised information for the NBAF final design.

DHS notes commentor's identification of additional information pertaining to the sources of groundwater and surface water used by the city of San Antonio, TX. DHS will document, review and incorporate all appropriate new and/or revised information for the NBAF final design. Following evaluation and if appropriate, new information would be added to the EIS.

DHS acknowledges commentor's identification of the Bexar Metropolitan Water District as the correct provider of potable water to the NBAF operation at the Texas Research Park Site Alternative. DHS will modify Section 3.7.8.3.3 of the NBAF EIS to reflect this correction.

DHS acknowledges commentor's identification of additional information pertaining to the sanitary sewage treatment system infrastructure for the NBAF operation at the Texas Research Park Site Alternative. DHS will document, review and incorporate all appropriate new and/or revised information for the NBAF final design. New information will be evaluated and if appropriate, included in the EIS.

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is located approximately 22 miles northeast of the TRP, not San Antonio

14. Page 3-83, 3.4.8.2.1 Climate and Severe Weather. First paragraph, second line, there is an incorrect reference to the Manhattan Site Campus.

15. Page 3-85, 3.4.8.3.2 Air Quality. Bexar is currently in attainment for ozone.

16. Page 3-94, 3.5.8.2 Construction Consequences. The site description in the first sentence conflicts with the land cover description provided on Page 3-27, 3.2.8.1.1 Land Use.

17. Page 3-121, 3.6.8.2 Construction Consequences. The suggested excavation of 324,000 cyd of material seems high.

18. Page 3-150, 3.7.8.1.3 Ground Water. The Edwards Aquifer is not the sole source of drinking water for the San Antonio community. The Trinity and Carrizo Aquifers supply water to areas of the community, as well as Canyon Lake. In addition, the San Antonio Water System has developed underground storage facilities that current store 15 Billion gallons of water that can be pumped back into the Edwards aquifer. There are also plans to develop a second phase that will have a capacity of 3 to 5 times more storage.

19. Page 3-152, 3.7.8.3.3 Ground Water. BexarMet Water District will provide water to the NBAF. Text indicates the City of San Antonio will provide water.

20. Page 3-153, Cumulative Impacts. Paragraph 4, see Comment number 11 above.

21. Page 3-300, 3.10.8.1.3.1 Public Schools. The TRP site is located within the Northside Independent School District (NISD), not SAISD.

22. Page 3-304, 3.10.8.3.3.1 Public Schools. NISD, not SAISD, see Comment .

23. Page 3-309, 3.10.9.6.2 RVF. This paragraph suggests mosquito habitat

Comment No: 14 Issue Code: 26.0

See response to Comment No. 2.

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15|12.6 is widespread, which conflicts with information in 3.5.8.2 and 3.7.8.1.1 addressing on-site or local creeks and surface water. Local creeks are active during and after rain events only.

24. Page 3-327, Cumulative Impacts. Indicates minor impact to Traffic and Transportation, which is contrary to Table ES-3 Comparison of Environmental Effects which indicates moderate. Considering the above mentioned corrections, Table ES-3 Comparison of Environmental Effects categories Infrastructure and Traffic and Transportation should be upgraded to at least minor, if not negligible.

25. Page 3-360, 3.13.9.3 Operation Consequences. The text in the first two sentences of the second paragraph seem to conflict. The existing and proposed 8" sewer mains will have adequate capacities to support NBAF and future developments in TRP.

26. Page 3-360, Cumulative Impacts. The Medio Creek WRC is scheduled for completion during the 4th quarter of 2008. See also Comment 10 above.

Conclusion

17|5.6 The Texas Research & Technology Foundation appreciates the opportunity to provide input regarding this EIS. The appropriate and optimal siting of the NBAF is a critical national scientific and security concern. The San Antonio area and the community surrounding the proposed facility at the Texas Research Park offer the NBAF a welcoming environment with solid existing infrastructure, with major financial support from the City and County including first-rate peripheral services, affordable housing, and a deep, vibrant and diverse employment pool that enthusiastically awaits the opportunity to serve the national interests that the NBAF proposal will fulfill.

We look forward to the completion of the EIS and will assist you in your efforts in any way required.

Comment No: 15 Issue Code: 12.6

See response to Comment No. 13.

Comment No: 16 Issue Code: 17.6

DHS acknowledges commentor's correction of the traffic and transportation cumulative effect for the Texas Research Park Site, reported in the Executive Summary, Table ES-3 of the NBAF EIS from the incorrect listing of "Moderate" to the correct listing of "Minor" as is detailed in Section 11.8.3.1 of the NBAF EIS. DHS will modify the Executive Summary, Table ES-3 of the NBAF EIS to reflect this correction.

Comment No: 17 Issue Code: 5.6

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

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Sincerely,



York Duncan
President, Texas Research & Technology Foundation
Board Member of TBAC