

Ferguson, Eddie

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MD0105

Friday, August 15, 2008

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

Dear Mr. Johnson,

1| 24.3 | I am writing in support of Homeland Security placing the Bio-Defense facility in
Butner, North Carolina. I have lived in the [REDACTED] all of my life and believe that
2| 1.0 | Homeland Security has the ability to establish and operate a safe, secure environment
investigating and evaluating certain technologies critical to the well fare of the United
States.

I believe Butner is the right choice. With its available land and access to great
minds at several top-flight universities, Butner is the only choice.

cont.] 1| 24.3 | Thank you for allowing me this opportunity to lend my support for Butner as you
select the NBAF site.

Sincerely,



Eddie Ferguson

[REDACTED]
[REDACTED]
[REDACTED] NC [REDACTED]

Comment No: 1 Issue Code: 24.3

DHS notes the commentor's support for the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 1.0

DHS notes the commentor's statement.

Field, Jack

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Control Number: 5392203

MD0009



Washington Cattlemen's Association

P.O. Box 96 • 1301 N. Dolarway • Ellensburg, WA 98926-0096
509/925-9871 • FAX 509/925-3004
wacattle@kvalley.com • www.washingtoncattlemen.org

April 18, 2008

The Honorable Secretary, Edward Schafer
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Schafer,

1| 27 The Washington Cattlemen's Association (WCA) would like to voice its strong opposition to any efforts by either the Federal Government or the USDA to relax any Foot and Mouth Disease (FMD) restrictions that have been placed on Countries that have FMD.

The recent news of the potential relaxation of FMD requirements on Argentina is unacceptable and may place the US Beef Industry in great danger of an unnecessary exposure to FMD. The WCA recommends that the USDA not allow for regionalization when considering FMD status for Countries around the world.

2| 24.1 The WCA would like to voice our strong disapproval to the potential relocation of the FMD research facility that is currently located on Plum Island. The Plum Island facility has served as the premier research facility for Foreign Animal Disease (FAD) for decades. FAD's have not successfully escaped from Plum Island. The current Plum Island location is an excellent location as it is surrounded by water and is in an area that does not have a large cattle population. Mr. Secretary, the WCA strongly recommends that the USDA support the Plum Island Facility and not consider moving it to a mainland location.

3| 27 The WCA would also like to voice our strong disapproval of the way that the USDA handled the Hallmark Packing Plant issue. Mr. Secretary, the entire US Beef Industry expects and deserves better service than the Hallmark video portrayed. It is the USDA's responsibility to ensure that the proper inspections and enforcement actions are being conducted at each and every one of the packing plants that the USDA inspects every day. The WCA would like to know what the USDA is doing to prevent this type of activity from occurring in the future. As you well know, we must police ourselves, however, the USDA has an inherent responsibility to both consumers and producers to uphold and enforce all animal health and food safety regulations.

Sincerely,

Jack Field, Executive Vice President
Washington Cattlemen's Association

Comment No: 1 Issue Code: 27.0

DHS notes the information submitted by the commentor.

Comment No: 2 Issue Code: 24.1

DHS notes the commentor's preference for siting the NBAF in a more isolated location such as the current Plum Island location. The NBAF EIS fully analyzes the Plum Island Site Alternative.

Comment No: 3 Issue Code: 27.0

DHS notes the information submitted by the commentor.

Fink, Lori

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WD0240

From: Lori Fink [REDACTED]
Sent: Tuesday, August 12, 2008 7:01 PM
To: NBAFProgramManager
Subject: To whom it may concern:

Greetings- My name is Lori Fink and my husband and I live [REDACTED] miles north of [REDACTED] and raise purebred Angus and Charolais seedstock on our 700 acres flinthills ranch. We are active members of the Kansas Livestock Association, Kansas Angus Association and Kansas Charolais Association. I am 53 and my husband is 57 years old. Our ability to make a living raising cattle depends on a constant, normal grass growing environment with no restrictions on travel from place to place.

1|25.4 I am against building a National Bio and Ag Defense research facility on the Manhattan K-State Campus. K-State is located in the very heart of the Flint Hills region of the greatest native rangelands left in America today. It is home to thousands to beef cattle as well as Kansas folks that take care of these cattle.

2|21.4; If any of the research conducted at this facility escapes and contaminates the area around
3|5.0; Manhattan, all livestock would be affected. I would like to see a facility of this type put as far away from livestock as possible so as to not destroy a way of life and living for so many livestock producers.

Thank you for your consideration of my opinion on this matter that touches my back door.
Lori Fink, [REDACTED] Ks.

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 concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 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 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, 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.

Comment No: 3 Issue Code: 5.0

DHS notes the commentor's opposition to any site alternative near livestock including the Manhattan Campus Site Alternative.

Finley, Suzannah

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WD0233

From: [REDACTED] on behalf of Suzannah Finley [REDACTED]
Sent: Tuesday, August 12, 2008 10:52 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1|21.2 | I do not understand the logic of putting the NBAF near a college town such as Athens. Studying live viruses carries the automatic risk of spreading to the neighboring environment, as I am sure you know. In a college town this risk is increased considering the number of out of state students that would take the virus back to their hometowns should a break occur.
- 2|25.2 | Honestly, it seems sheer stupidity to put such a facility in Athens. Please put it elsewhere.
 Sincerely,
 Suzannah Finley

Comment No: 1 Issue Code: 21.2

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population and the extent to which college students may increase the negative impacts of the release. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 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 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, 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.

Comment No: 2 Issue Code: 25.2

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

Firth, Ian

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WD0460

From: [REDACTED] on behalf of [REDACTED]
Sent: Thursday, August 21, 2008 8:00 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

- 1| 25.2 Dear NBAF Program Manager.
 I share the concerns of many others in the [REDACTED] area about the establishment of the NBAF in our community. Admittedly much of the opposition is of the 'not in my back yard' variety and reflects a widespread lack of confidence in the DHS and its assurances about safety, but if one discounts such opposition one should also recognise that much of the support is from people and organizations in and around the university who have a strong expectation of direct or indirect economic gain.
- 2| 2.2
- 1 cont. | However if one attempts to take a calm and disinterested view of the pros and cons of the selection of this particular
 25.2 location, there are some legitimate concerns. Some of these are suggested by the draft EIS, notably water supply problems, traffic congestion, and industrial scale development in a rural environment, and in addition there seem to be unanswered questions about air quality. But another important issue does not seem to have received as much attention - the capacity and willingness of local governments to plan for growth produced by the economic stimulus provided by the NBAF in such a way that it does not produce the diseconomies of low density urban sprawl. To state the obvious - urban sprawl is a national problem with enormous long-term environmental, social and economic costs, and the widespread local, state, and federal governmental subsidization of sprawl is now being questioned as the price of energy soars. One has only to drive through the counties around
- 3| 15.2
- 4| 5.2 Athens, and particularly Oconee County, to realize that local governments are addicted to sprawl and the chances of effective planning measures being introduced are virtually nil. To locate the lab beside Oconee County would be the equivalent of giving candy to a diabetic. In the interests of national security and energy conservation, the federal government should select a site in a place that has a record of effective land use planning - and that unfortunately cannot be found in this location.
- Sincerely, Ian Firth.

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: 2.0

DHS notes the commentor's concerns. The NBAF EIS was prepared to provide a thorough analysis of the aspects of NBAF construction and operations at the six site alternative locations. The potential impacts of NBAF operations on environmental resources, health and safety, and on local transportation are discussed in Chapter 3 of the NBAF EIS.

Comment No: 3 Issue Code: 15.2

DHS notes the commentor's statement. As described in Section 3.10.3.3, the population is expected to increase by approximately 671 as a result of the operation of the NBAF; however, the land use planning policies of local municipalities is not within the scope of the NBAF EIS, which evaluates the environmental impact of the no action alternative and the alternatives for constructing and operating the NBAF.

Comment No: 4 Issue Code: 5.2

DHS notes the commentor's concern regarding land use of the NBAF sites which are described in Section 3.2. A change in land use would occur at all sites; however, current zoning regulations are under the jurisdiction of Clarke County and allow for this type of development to occur. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Section 3.2.3. DHS and USDA ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and policies. Land use regulations and policy for Oconee County are set by the local government.

Fischer, Helen

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MD0138

Wednesday, August 13, 2008

Dear James V. Johnson, U.S. Dept. of Homeland Security,

^{1|2.0} In the last, waning days of this administration, we are being told we need a new Biosafety Level 4 Lab to replace the current Level 3 Lab on Plum Island, N.Y. The Dept. of Homeland Security, DHS, another construct of the current administration, adds another layer of administration but with no accountability nor oversight. It is simply a way of awarding expensive, no-bid contracts to favored companies and giving 'national security' reasons to avoid legislative oversight and accountability.

According to the Environmental Impact Statement (EIS), NBAF 'would be either operated directly by the government or operated by a contractor with strict government oversight.' But Rep. John Dingell needed to threaten DHS with subpoenas for not providing the Environmental Impact Statement to the GAO and the Congressional Subcommittee. And Rep. Bart Stupak, Chairman of the Energy and Commerce Committee also had difficulty with DHS. Is there any transparency?

A BSL - 4 rating means the lab is equipped for the study of '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,' according to the DEIS. Both Senators Hillary Clinton and Charles Schumer are opposed to adding a Level 4 lab site to Plum Island. What do they know? Where are our leaders?

^{2|15.3} Think of it. Now they can import a foreign pathogen, release it, expend tremendous taxpayer funds to clean it up, fight it with vaccines (whose manufacturers have no liability). A maelstrom could be created in our state, causing enormous damage, privatizing profits and socializing our risks. There are an estimated additional \$265 million required to fund infrastructure like gas, water, sewer, roads and an electrical hub for which the state and locality will have to pick up the tab. This is an offer that is not good to refuse.

In the approximately 230 years since the founding of our country, we've never had a Dept. of Homeland Security and we've been attacked before - at Pearl Harbor. We've never needed a Dept. of Homeland Security. Like so many titles used by this administration, it's a misnomer. It should be called Homeland Insecurity because it will only burden taxpayers, reward private contractors with expensive, no-bid contracts and little or no oversight and endanger all our health.

^{3|21.3} Knowing what we know today about recombination, how small pieces of DNA conferring lethal properties could be incorporated into new pathogens and enter our water, wildlife or vectors like mosquitoes or ticks, and knowing a private contractor has motive to maximize profit and cut corners, should be enough for all of us to decide against NBAF.

Sincerely,

H Fischer
N.C. voter

Comment No: 1 Issue Code: 2.0

DHS notes the commentor's lack of confidence in the DHS. DHS has made every effort to explain the operational aspects of NBAF and has conducted a thorough and open public outreach program in support of the NBAF EIS that exceeded NEPA requirements. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). There would be no classified research at the NBAF, however there may occasionally be classified FBI forensics cases. Currently, the PIADC facility publishes research in publicly available research journals; NBAF would publish its research in publicly available research journals as well. Decisions on whether to construct and operate the NBAF and, if so, where, will be based on the analyses presented in the NBAF EIS and other factors such as cost, engineering and technical feasibility, strategic considerations, policy considerations, and public input. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published. 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.

Comment No: 2 Issue Code: 15.3

DHS notes the commentor's concern. Should the NBAF Record of decision call for the design, construction and operation of the NBAF, a site-specific emergency management plan will be developed that will be coordinated with the local emergency response agencies. The emergency management plan will be in place prior to the initiation of research activities at the proposed NBAF. DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans will also include training for local law enforcement, health care, and fire and rescue personnel.

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

Comment No: 3 Issue Code: 21.3

DHS notes the commentor's concerns regarding an accidental release of pathogen from the NBAF and the establishment of that pathogen in native wildlife or vectors such as mosquitoes. 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. The NBAF would provide state-of-the-art

operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections, vector escape and accidental releases. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. 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. 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. 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the Umstead Research Farm Site is specifically addressed in Section 3.8.9 and Section 3.10.9.5 as well as in Section 3.14.4.5 (Health and Safety). Section 3.10.9.5 discusses the relative suitability of the regional climate of the Umstead Research Farm Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.7.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Fisher, John

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NCD014



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: John Douglas Fisher

Title: MR.

Organization: American Citizen

Address: [REDACTED]

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

Comments: How do you spell Gulag?
I don't trust the local police to inform the
locals in case of emergency. A long history
of answering only to Raleigh first and foremost
prevents Butner and has for many years and
is not changing even with our farcical
"incorporation"
Butner has been a dumping ground of human
tragedy too long and is now breeding it in
the local children who are surrounded by
the worst of human frailties

John Fisher

(Continued on back for your convenience)

Comment No: 1 Issue Code: 19.3
 DHS note the commentor's lack of confidence that the local police will provide proper notification in the event of an emergency at the NBAF. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific operational, safety, security and emergency protocols and plans would be developed that would consider the diversity and density of human, livestock and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. Emergency response plans would be coordinated with local entities and would require proper notification of local populations in a timely and agreed to manner. 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: 2 Issue Code: 2.0
 DHS notes the commentor's statement.

Fisher, Ph.D., Jeffrey

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WD0258

From: Jeffrey Fisher [REDACTED]
Sent: Saturday, August 16, 2008 8:00 AM
To: NBAFProgramManager
Subject: Athens GA site

1|24.2 | I am writing to document my support for the construction of the new laboratory in Athens GA. I
 2|21.2 | spent 25 years in
 a federal military toxicology laboratory before coming to the [REDACTED]. The health
 risks posed to the
 3|15.2 | under-served, poor and disadvantaged in Athens, GA greatly outstrips the health risks created by
 construction of this
 laboratory. Since this laboratory will be a GOCO facility, I would encourage that funds be make
 available for training
 (continuous process improvement) for technicians and staff and that hiring goals be set that
 represent the population
 demographics. The federal labs (USEPA and USDA) and UGA do not have particularly strong
 initiatives in place for working together,
 and is unlike many other communities in the US. I want to see the federal sector and the public
 sector (UGA) in Athens take much
 more of a collective leadership role in creating dynamic research programs.

Jeff Fisher

--
 Jeffrey W. Fisher, Ph.D., Fellow, ATS
 Professor and Director, Interdisciplinary Toxicology Program
 Department of Environmental Health Science

[REDACTED]
[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: 21.2

DHS notes the commentor's statement.

Comment No: 3 Issue Code: 15.2

DHS notes the commentor's concerns. DHS has not yet determined whether the proposed NBAF will be a government owned/contractor operated (GOCO) or a government owned/government operated (GOGO) facility. The type of management configuration selected could influence the degree to which the local labor force would be employed at the NBAF. Under a GOGO regime, for example, current employees at PIADC would have the opportunity to transfer their jobs to a new location if the final NBAF EIS selected a site other than Plum Island. Regardless of the management configuration the facility would be staffed by qualified employees and hiring would be consistent with federal labor laws.

Fitzgerald, Rebecca

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WD0394

From: Becky Fitzgerald [REDACTED]
Sent: Wednesday, August 20, 2008 9:07 AM
To: NBAFProgramManager
Subject: [REDACTED] citizen welcomes NBAF!

1|24.4 | I expect my government to weigh the pros/cons of each of the prospective sites and select the one that's most suitable for this research facility. As a [REDACTED] KS, resident, I believe our leaders have clearly demonstrated how Manhattan outshines our competition.

I look forward to hearing that the Department of Homeland Security has selected Manhattan, and I appreciate this opportunity to express my opinion.

I am Rebecca Fitzgerald, 43, a [REDACTED] who returned to [REDACTED] 10 years ago to join her husband in starting a small business.

Thank you.

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

Flanagan, Jason

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WD0390

From: Jason Flanagan [REDACTED]
Sent: Wednesday, August 20, 2008 7:04 AM
To: NBAFProgramManager
Subject: The Athens, Georgia site for the National Bio- and Agri-Defense Facility

To whom it may concern:

- 1|25.2 As a resident of a [REDACTED] I strongly oppose the placement of the NBAF at the proposed location in Clarke County. As a parent of four, I worry about the dangers of having a facility of this type so close to a population center like Athens and Watkinsville and the Oconee River. Additionally, working with foot-and-mouth disease so close to cattle at the UGA agriculture facilities and in neighboring Oconee County seems illogical, especially in light of the recent criticism by Rep. John Dingell, chairman of the House Energy and Commerce Committee.
- 2|21.2 The details of the recent anthrax case and the seemingly lax oversight currently protecting the public from the dangerous pathogens within a facility of this kind have done little to ease my worries.
- 3|5.0 If it is decided that a facility of this kind is justified and is a necessary way to spend my tax dollars, at least you should have the good sense and decency to place it well away from people who could be so horribly impacted by another failure in security.

Athens, Georgia is not the place for your facility. Please look elsewhere.

Regards,
 Jason

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 21.2

DHS notes the commentor's 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. Sections 3.8.9, 3.10.9, 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from an accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. 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: 5.0

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

Fleming, Mary Ann

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WD0125

From: Mary Ann Fleming [REDACTED]
Sent: Tuesday, July 29, 2008 1:40 PM
To: NBAFProgramManager
Subject: proposed facility Manhattan

- 1) 25.4 | As a citizen of this [REDACTED] I oppose locating the NBAF site here.
 2) 15.4 | There is simply too much risk involved to the economy of our state
 3) 21.4 | should an accident or security breach occur. Mary Ann Fleming, [REDACTED]
 [REDACTED] KS [REDACTED]

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 15.4

DHS notes the commentator's concern. A discussion of human health and safety is included in Section 3.14. The potential effects to the local, state, and national economies of an accidental release are described in Section 3.10.9 and Appendix D.

Comment No: 3 Issue Code: 21.4

DHS notes the commentator'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. Sections 3.8.9, 3.10.9, 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from an accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, then site-specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. 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.

A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and would be 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-biocontainment pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Fleury, Laura

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WD0160

From: [REDACTED] on behalf of Laura Fleury [REDACTED]
Sent: Saturday, August 02, 2008 11:59 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

To the NBAF Program Manager,

1| 25.2 | We do not want the NBAF in Athens! I am a student at the [REDACTED] and have talked with many other students about how a facility like this would be devastating to our community. I am just a college student, but proposals like this one make me frightened and sad.

2| 12.2 | I personally live [REDACTED] from the proposed site, and do not want or support this. Not only is Georgia in the middle of a drought, but we are in mosquito and tick heaven! And the mosquitoes especially love me; they are always drawn to me out of a crowd of people- My mom always said that was because I was so sweet...

2 cont.| 12.2 | This facility would use water that we desperately need. I am using rain water to water my plants, I take 5 min. showers 5x a week, I turn the water off when I brush my teeth and try not to flush my toilet so much- so that I can help save water! And you want to put a facility that would use 43 million gallons of water a year? No thank you.

3| 21.2 | Not to mention that if any disease being tested in that lab escaped, the damage done to our community and the state of Georgia would be devastating- and personally affect many of my family members and friends. I know that there will be all sorts of safety precautions, and I can read article after article telling me how "safe" the facility will be- but the 326 employees that will be employed there are human, and we do make mistakes.

1 cont.| 25.2 | My household is strongly opposed to the NBAF- please don't bring it to Athens.

Sincerely,

[REDACTED]
 Laura Fleury

Comment No: 1 Issue Code: 25.2

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

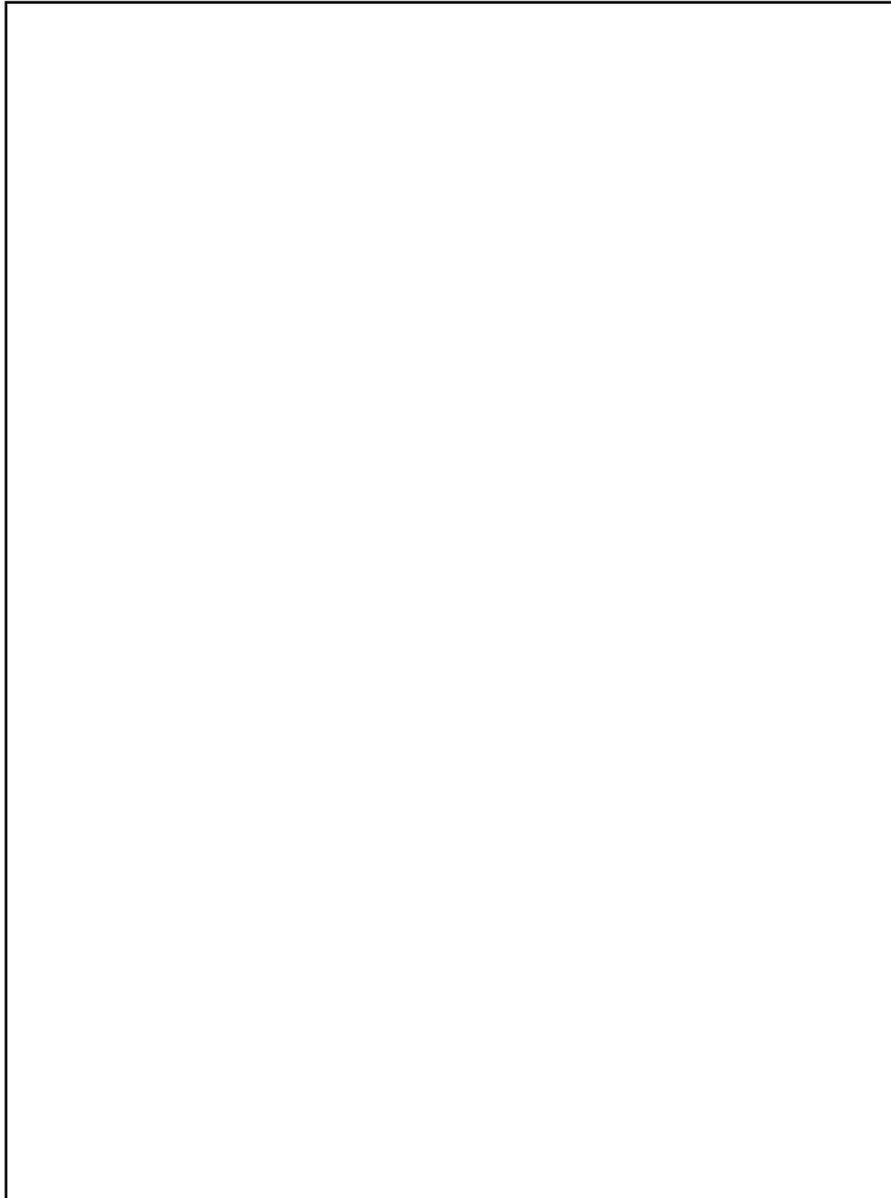
Comment No: 2 Issue Code: 12.2

DHS notes the commentor's drought concerns. As described in Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage.

DHS notes the commentor's concerns regarding an accident at the NBAF. 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 [RVF] virus) becoming established in native mosquito populations was evaluated in Sections 3.8.9, 3.10.9, and 3.14 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 NBAF. RVF and foot and mouth disease SOPs and response plans would likely include strategies that are similar. However, the RVF response plan would also include a mosquito control action plan. The potential consequences of pesticide use would be evaluated during the preparation of a site-specific response plan.

Comment No: 3 Issue Code: 21.2

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.

Flinn, Amy

Page 1 of 1

WD0826

From: Amy Flinn [REDACTED]
Sent: Monday, August 25, 2008 6:24 PM
To: NBAFProgramManager
Subject: NBAF in Manhattan Kansas

To Whom It May Concern,

1| 5.4 I am emailing my comments in opposition to placing the National Bio and Agro-Defense Facility in
 2| 19.0 Manhattan, Kansas. As a rancher's wife in the [REDACTED] area and Principal of an elementary school
 located just to the [REDACTED] I do not support the placement of this facility in our area for the
 safety of our community, including our children, as well as the safety of our livestock.

3| 19.4 As pasture and cattle owners in the [REDACTED] of Kansas, the potential threat of these pathogens being
 released into our area would be detrimental to the food supply of our country, as well as to the livestock
 industry in Kansas. Furthermore, I do not support placing our community in this type of grave danger by
 bringing the most dangerous pathogens in the world to Kansas.

Sincerely,

Amy R. Flinn
 [REDACTED]
 [REDACTED] USD [REDACTED]
 [REDACTED]

Comment No: 1 Issue Code: 5.4

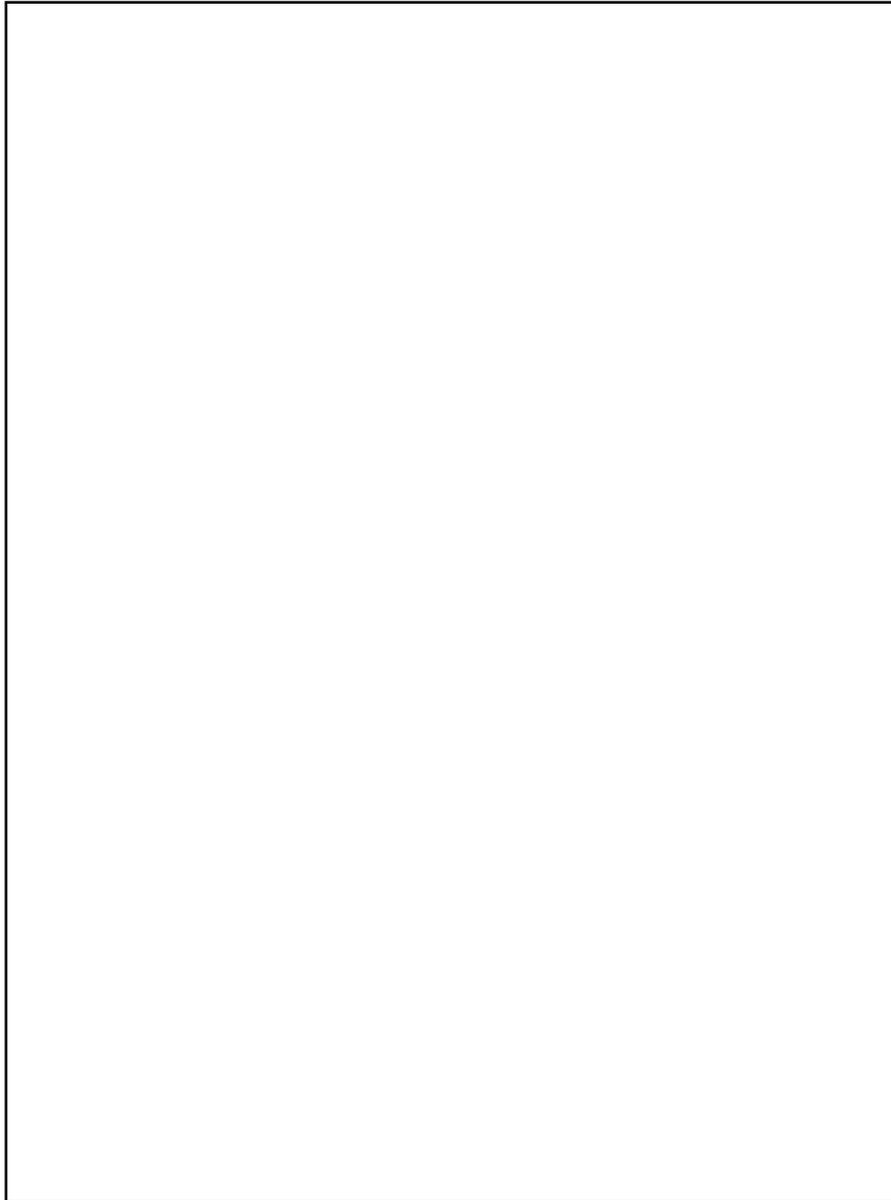
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 19.0

DHS notes 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. Sections 3.8.9, 3.10.9, 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from an accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. 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: 19.4

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 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 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, 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.

Flinn, Marlene

Page 1 of 1

PD0078

August 15, 2008

- 1|25.4 | This is Marlene Flinn, [REDACTED] Kansas and I would like to be recorded as being opposed to the NBAF lab to be developed and made at Kansas State University at Manhattan, Kansas.
- 2|24.1 | I believe that this should be kept on Plum Island where, could any escapes from it could not come into the mainland for the United States. It will cost a fortune to the state, the U.S. Government, will ruin all livestock producers if something would escape within the mainland. And I understand we could never have livestock again on any land that the hoof and mouth disease might have been on. I understand also it would...they would destroy pets as well as all of the livestock and other diseases that would be transferrable to the humans.
- 4|5.1 | I am very much opposed to it and believe it would only make sense as it did when they made the first lab up at Plum Island. Continue to keep it where it has a little bit of privacy and away from the mainland to the United States.
- 3 cont. | Please, think about what the costs will be for the future if all of our livestock are gone.
21.4 |
- Thank you.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 24.1

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

Comment No: 3 Issue Code: 21.4

DHS notes the commentor's concern regarding the impact from a release of Foot and Mouth Disease (FMD) in Kansas. 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 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: 4 Issue Code: 5.1

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

Fortune, Monique

Page 1 of 1

WD0509

From: Monique Fortune [REDACTED]
Sent: Friday, August 22, 2008 2:32 PM
To: NBAFProgramManager
Subject: NBAF Support

To whom it may concern:

1| 24.4 | I support NBAF in Kansas

Thanks.
Have a nice day.

Monique Fortune
Payroll and Property Tax Analyst
[REDACTED]

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Comment No: 1

Issue Code: 24.4

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

Foscue, Spence

Page 1 of 1

WD0128

From: [REDACTED]
Sent: Wednesday, July 30, 2008 10:14 AM
To: NBAFProgramManager
Subject: Bio lab proposal for Granville County

1|25.3 I am employed in [REDACTED] I am concerned about the siting of the Biohazard Research lab there. While my concern about the safety and security of such a facility is compelling, I am mostly concerned that this facility may be sited in an area where it is apparent that local opposition is very vocal, educated and strong. I would hope that those in charge of decision making would take this into immediate consideration and quickly withdraw the proposal to site the bio lab in Granville County.

--
Spence M. Foscue

Comment No: 1 Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative. All comments received during the 60-day comment period, both oral and written, were given equal consideration and responded to in NBAF Final EIS. Community acceptance is only one of several factors that will affect the decision on whether or not the NBAF is built, and, if so, where. The decision will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in section 2.3.1 (includes community acceptance); 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.

Foster, Van

Page 1 of 1

MSD003



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: VAN FOSTER

Title: [REDACTED]

Organization: BOARD OF SUPERVISERS

Address: [REDACTED]

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

Comments: [REDACTED]

JOINING MADISON COUNTY ON BEHALF OF BOARD
IN [REDACTED] WE ARE VERY SUPPORTIVE OF THIS
FACILITY IF WE MAY ASSIST IN ANY WAY POSSIBLE
CONTACT US. VERY DESERVING COMMUNITY FOR
INDUSTRY.



(Continued on back for your convenience)

Comment No: 1

Issue Code: 24.5

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

1124.5

Fowler, Betty Alice

Page 1 of 1

WD0831

From: info@athensfaq.org on behalf of Betty Alice Fowler [REDACTED]

Sent: Monday, August 25, 2008 6:41 PM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1| 18.2 | At the first public hearing sponsored by the DHS (in the winter of '08), the official described disposing of carcasses as a process yielding a material "like oatmeal," which would be poured into the Oconee River. I understand that the EIS is not as specific regarding the disposal - but as I understand it will involve incineration - with a likely byproduct that must be gotten rid of somehow. Whatever it is, it is a disgusting prospect! Moreover, if ANYTHING is dumped in the river - whether it is officially decontaminated or not - it will hurt our water quality, flora, and fauna, with multiplying effects all the way to the ocean.
- 2| 12.2 |

It makes me sick to think about. The idea of such awful processes going on in our peaceful, beautiful town makes me sad beyond belief, not to mention the fact that it is going to be rather near to my home. If everyone in town knew how unspeakable the processes were going to be, you would never make it here. Unfortunately, many of the risks and unsavory processes have been glossed over or misrepresented or ignored.

- 3| 5.1 | Please locate NBAF on Plum Island, NOT IN ATHENS!
- 4| 25.2 |

Betty Alice Fowler
[REDACTED]

[REDACTED] GA

Comment No: 1 Issue Code: 18.2

DHS notes the commentor's concern regarding the disposal of animal carcasses and pathological wastes. Neither liquid nor solid residuals from any of the carcass/pathological waste disposal methodologies being considered would be directly discharged to the Oconee River.

Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological wastes. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). 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.

Section 3.13.2.2 of the NBAF EIS also addresses the disposition of waste liquids and solids that will result from different animal carcass/pathological waste disposal methods. As discussed in this section, alkaline hydrolysis and rendering will produce a liquid waste stream that may need onsite treatment before it is discharged to the sanitary sewer. Section 3.13.4.3 for the South Milledge Avenue Site explains that the sanitary sewer waste stream would have to meet the sewage acceptance criteria for the Middle Oconee Wastewater Treatment Facility. The NBAF would meet these criteria so as not to negatively impact sewage treatment capability due to flow rate or potentially harmful wastewater constituents. Incineration would produce a solid residual (see Table 3.13.2.2-3) that would be characterized and sent to a solid or hazardous waste management facility, as appropriate.

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's watershed and waste disposal concerns. The NBAF EIS Section 3.13.4 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects. The NBAF will be required to comply fully with regulations and safety protocols that pertain to the handling and disposal of biological and chemical wastes.

Comment No: 3 Issue Code: 5.1

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

Comment No: 4 Issue Code: 25.2

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

Fowler, Betty Alice

Page 1 of 1

WD0829

From: [REDACTED] on behalf of Betty Alice Fowler [REDACTED]
Sent: Monday, August 25, 2008 6:27 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1) 25.2 We are strongly opposed to NBAF in Athens, GA. It is a dangerous, ill-concieved plan that will have adverse effects on our community.
- 2) 26.0 The EIS report was not satisfactory. The mistaken qualification of the risk to Athens as "negligible" in the Executive Summary, when, in fact, the risk is considered "moderate" in the actual text of the study, brings the entire report, as well as the motives of the DHS and lab proponents, into question. Nevertheless, with the simple substitution of the word "negligible" for "moderate" in the Summary, NBAF is viewed by the many who do not bother to read the whole report as a benign entity, and has been publicized as such in the newspaper. At the recent public hearing on 8/15 the DHS officials seemed a bit embarrassed at this mistake but it is probably too late to un-do the harm it has done by misinforming the public.
- 3) 2.0
- 4) 24.1 NBAF should be built on Plum Island, where highly contagious zoonotic diseases can be kept away from the mainland. I have no doubt that the government is comparing costs for NBAF at the different sites, and is looking to save money. The cost of an accident is incalculable, but the potential harm is least if the lab is on Plum Island.
- 5) 15.2 Everyone knows the catastrophic economic impact of FMD in the UK. Here, it would be much worse as the US is so much bigger. The local deer population would be wiped out, as well, which would represent a loss to Georgia's economy of many many millions of dollars - not to mention the value that hunting holds for thousands of Georgians who enjoy hunting.
- cont.
1) 25.2 We do not want this dangerous facility in Athens!

Sincerely,

Betty Alice Fowler

[REDACTED]
GA

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: 26.0

DHS notes the commentor's statement. The "negligible" effect for Health and Safety is for normal operations (incident-free conditions and those abnormal conditions that frequency estimation techniques indicate occur with a frequency greater than 0.1 events per year) and is correct. The "moderate" risk factor was applied to sites in the risk assessment included in Section 3.14 of the NBAF EIS. The application of the risk ranks is applied to the potential for an accident to occur and the magnitude of the consequences of an accident.

Comment No: 3 Issue Code: 2.0

DHS notes the commentor's statement. The "negligible" effect for Health and Safety is for normal operations (incident-free conditions and those abnormal conditions that frequency estimation techniques indicate occur with a frequency greater than 0.1 events per year) and is correct. The "moderate" risk factor was applied to sites in the risk assessment included in Section 3.14 of the NBAF EIS. The application of the risk ranks is applied to the potential for an accident to occur and the magnitude of the consequences of an accident.

Comment No: 4 Issue Code: 24.1

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

Comment No: 5 Issue Code: 15.2

DHS notes the commentor's concern. Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Fowler, Betty Alice

Page 1 of 1

CD0908

From: [REDACTED] on behalf of Betty Alice Fowler [REDACTED]

Sent: Monday, August 25, 2008 6:52 PM

To: NBAFProgramManager

Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 25.2 | The DEIS clearly shows that the Athens, GA site is neither safe nor compatible from an environmental standpoint for the construction of NBAF.

NOTE the following:

2| 12.2 | 1. We are in the midst of a serious drought - we do not have the water to spare for NBAF.
2. Construction of NBAF will pollute the Oconee River with run-off and sediment - there is already too much of that with out-of-control development in this town - NBAF's effects will dwarf previous damage from development!

3. The harm to migratory birds who inhabit the proposed site will be very great. Clearing of habitat and lighting will change this peaceful area into a hazard for birds and possibly for other animals.

3| 13.2 | 4. The proximity of NBAF to the State Botanical Garden will forever alter the garden's peaceful existence. PLEASE NOTE THAT THE GARDEN IS PART OF THE UNIVERSITY OF GEORGIA AND AS SUCH ITS DIRECTOR AND STAFF ARE IN A DIFFICULT POSITION WITH REGARD TO PROTESTING NBAF.

Do not be fooled by any perceived silence from those quarters!

1 cont.| 25.2 | Please do not act irresponsibly in the face of such overwhelming evidence. NBAF should not be in Athens.

Sincerely,
Betty Alice Fowler

[REDACTED]
GA [REDACTED]

Comment No: 1 Issue Code: 25.2

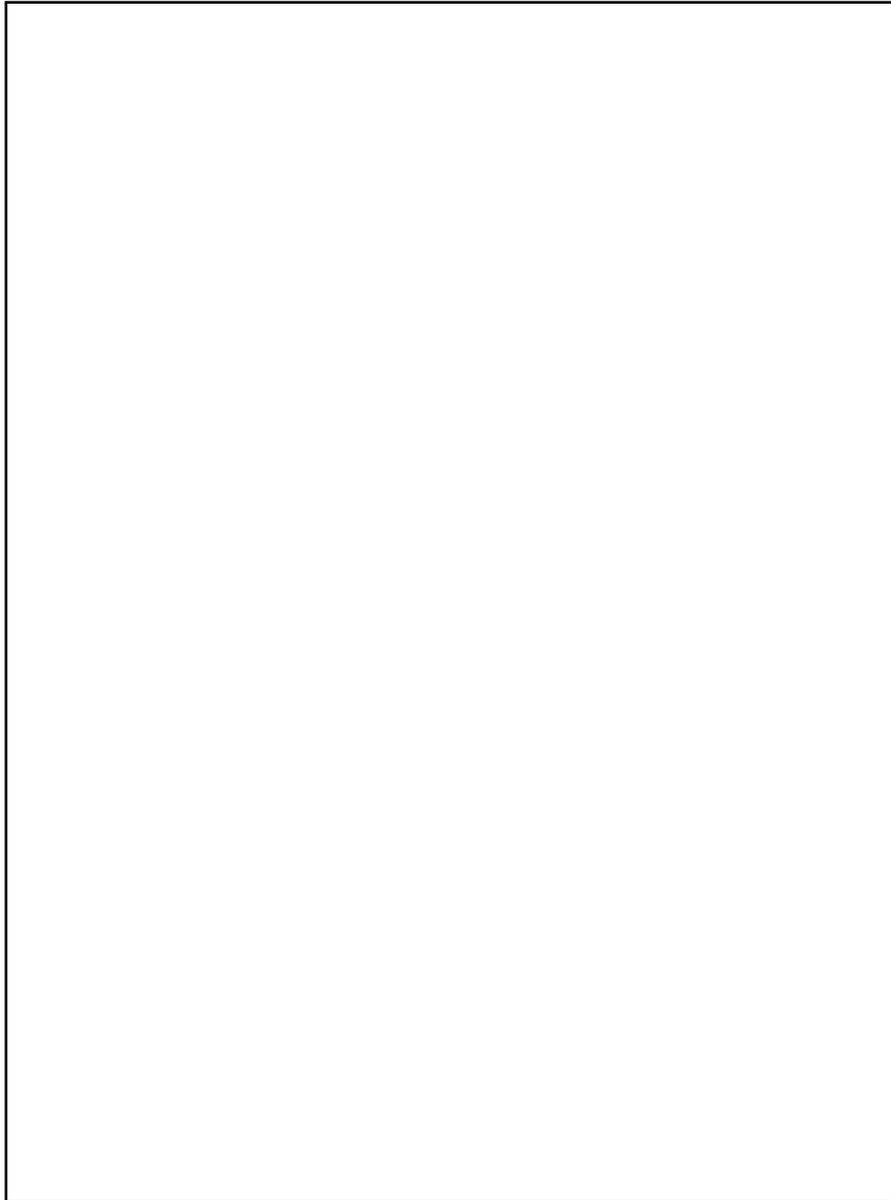
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's concerns regarding possible impact to the area's water resources and DHS acknowledges current regional drought conditions. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.13.4 describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects. With respect to the rate of water use at the NBAF, it is noted that the anticipated rate of 118,000 gallons per day is approximately 0.76% of Athens' annual average of 15.5 million gallons per day.

Comment No: 3 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the Botanical Garden and the potential impacts of development on wildlife. 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 South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife. Section 3.5.5.3 addresses operational noise impacts associated with the proposed NBAF. Minor noise impacts would result from an increase in traffic and operation of the facility's filtration, heating, and cooling systems. Section 3.5.5.3 describes noise-attenuating design features that would minimize noise emissions. In the event of a power outage, operation of back-up generators could have a short-term impact on wildlife by discouraging utilization of immediately adjacent habitats. Routine operations at the NBAF would not be likely to have significant noise impacts on wildlife. Security requirements at the proposed NBAF would require continuous outdoor nighttime lighting. Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. Unshielded lighting can shine upward and interfere with bird migration, disorienting birds and causing them to collide with structures. Birds are attracted to lights and may collide with lighted structures. Most concerns involve lighting associated with high-rise buildings and tele-communication towers; however, even residential lighting can affect some birds. The USFWS advocates the use of shielded lighting to minimize adverse impacts on migratory birds. Shielded fixtures direct light downwards and can be used to keep light within the boundaries of the site. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigative measures, such as those described above, will be considered in the final design



of the NBAF. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. However, the use of shielded lighting would minimize the potential for impacts in adjacent habitats. Given the relatively low profile of the building and the use of mitigative measures, significant lighting impacts on migratory birds would not be likely to occur.

Fox, Jimmy and Shelia

Page 1 of 1

WD0643

From: [REDACTED] on behalf of Jimmy and Shelia Fox [REDACTED]
Sent: Friday, August 22, 2008 6:20 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

We did not come to the hearing and have learned that we still have time to make our desires known on the NBAF locating in Georgia.

2|25.2 | We live in an [REDACTED] and this is to notify you that our vote in locating the Bio Center in Georgia is a resounding NO!

Thank you.

Jimmy and Shelia Fox

Comment No: 2 Issue Code: 25.2
DHS notes the commentator's opposition to the South Milledge Avenue Site Alternative.

Foy, Joy

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08/22/2008 03:29 6013591971

MDA ASSET DEVEL/REGL

PAGE 01/02

FD0045

MISSISSIPPI DEVELOPMENT AUTHORITY

Joy Foy
Director, Asset Development/Regional Services Division
Post Office Box 849, Jackson, Mississippi 39205
Telephone: (601) 359-2659
Telefax: (601) 359-1971
Email: jfoy@mississippi.org

Fax

To James V. Johnson
Fax Number 1-866-506-6223
From Joy Foy
Date August 22, 2008
Pages, including this cover sheet 2

Message

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Foy, Joy

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06/22/2008 03:29 6013591971 MDA ASSET DEVEL/REGL PAGE 02/02
FD0045



STATE OF MISSISSIPPI
HALEY BARBOUR, GOVERNOR
MISSISSIPPI DEVELOPMENT AUTHORITY
GRAY SVOOPE
EXECUTIVE DIRECTOR

August 22, 2008

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

Dear Mr. Johnson:

I live in Canton, Mississippi and worked in Madison County for the past 33 years before taking a job with the State of Mississippi in Jackson.

My family is very excited about the potential of getting the National Bio and Agro-Defense Facility in Flora, Mississippi. For years we have been watching as people from other states move here and do not want to leave because of the excellent quality of life and the low cost of living here in Mississippi.

We look forward to supporting you and helping through my office as well as with personal support in the community.

Thanks for considering Mississippi,



Joy Foy
Director
Asset Development/Regional
Services Division

JF:ao

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Comment No: 1

Issue Code: 24.5

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

Fransson, Roger

Page 1 of 2

MD0095

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Hj

RECEIVED BY DHS EXEC SEC
2008 SEP 16 PM 1:08

G R M Fransson
[REDACTED]
CT

Gale Buchanan
Undersecretary of Research, Education and Economics
Department of Agriculture
1400 Independence Ave SW
Washington, D.C. 20250

17 August 2008

Dear Undersecretary Buchanan,

1 | 25.1 I am deeply and seriously concerned over the Department's proposal to upgrade the security/testing status of the Plum Island infectious animal-disease site just off the coast of Connecticut. This site has a history of dangerous practices and scientific mismanagement going back to its inception; it shouldn't even be utilized for animal diseases, no less for experimenting with human diseases, which has indeed gone on there unauthorized in the past by irresponsible scientists. There have been many releases of bacilli and virus toxins into the surrounding area and waters. It may have been responsible for the initial outbreaks of Lyme's disease and West Nile virus via birds (and insect parasites) onto the US mainland. Please read the very well researched book: *Lab 257: The Disturbing Story of the Government's Secret Plum Island Germ Lab*, by Michael Carroll. I read this book several years ago and it makes a strong case for the assertions above.

2 | 5.0 I had thought that the facility had been closed indefinitely and dismantled; perhaps this was just wishful thinking on my part. But it should indeed be closed and these experiments terminated.

A more likely site for such activities might be the remote desert areas of Nevada?

Thank you for your time and kind consideration in this matter of deep significance for those of us who live in proximity.

Yours truly, 
Roger Fransson

Cc: Richard Blumenthal, Secretary Ed Shafer, Jon Krohmer, Secretary Michael Chertoff, Selectmen Roland Laine, William Pease (Old Saybrook)

Comment No: 1

Issue Code: 25.1

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

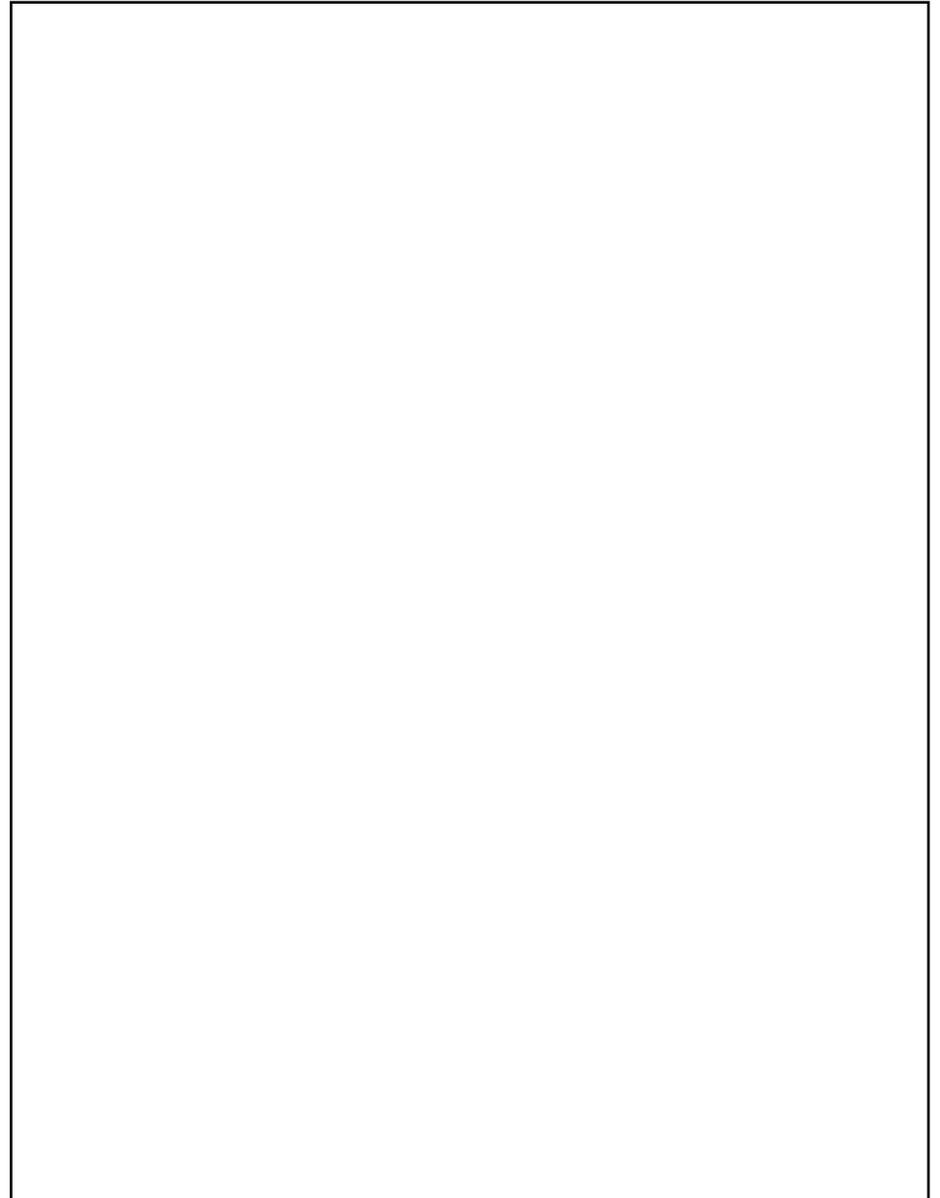
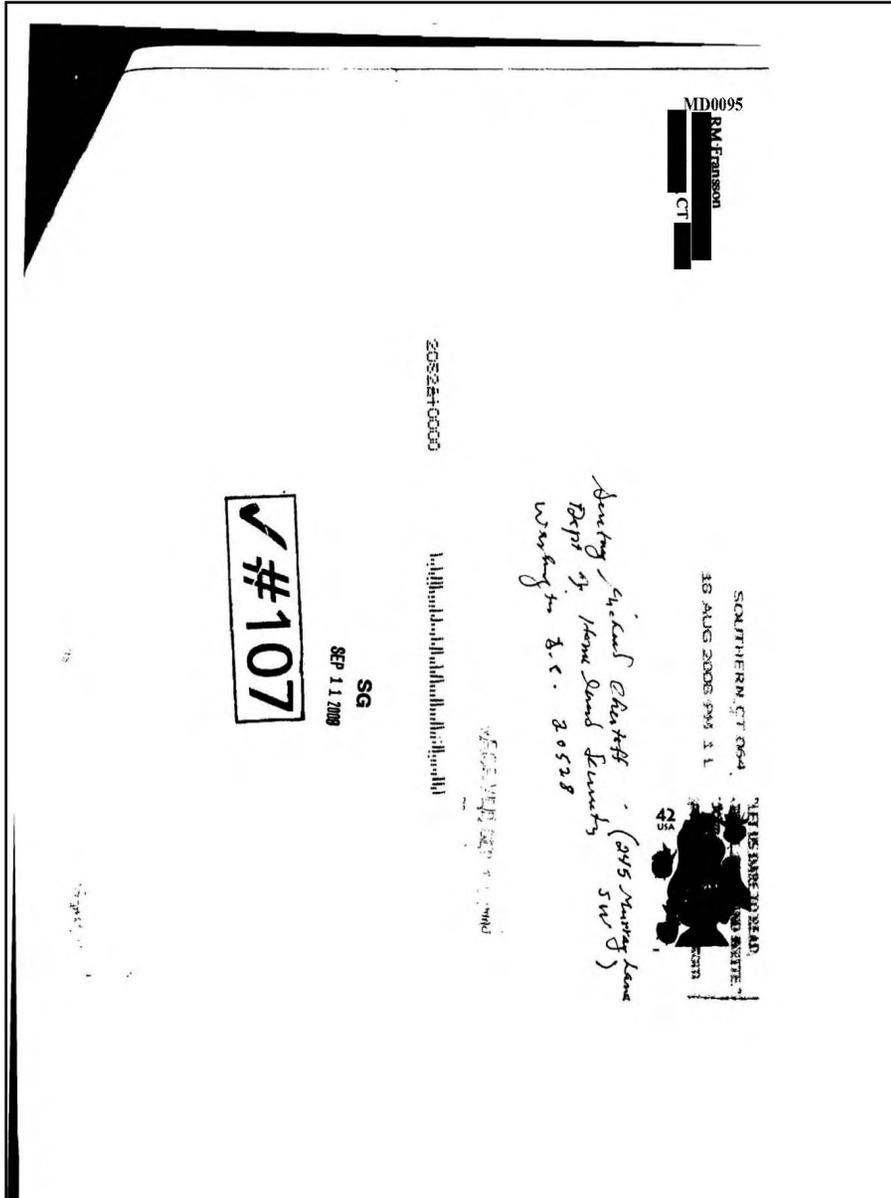
Comment No: 2

Issue Code: 5.0

As described in Section 2.4.3 of the NBAF EIS, other potential locations to construct the NBAF were considered during the site selection process but were eliminated based on evaluation by the selection committee. It was suggested during the scoping process that the NBAF be constructed in a remote location such as an island distant from populated areas or in a location that would be inhospitable (e.g., desert or arctic habitat) to escaped animal hosts/vectors; however, the evaluation criteria called for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. The Plum Island Site is an isolated location as was suggested while still meeting the requirements listed in the Expression of Interest (EOI).

Fransson, Roger

Page 2 of 2



Freeman, Lorie

Page 1 of 1

WD0235

From: Lorie Freeman [REDACTED]
Sent: Tuesday, August 12, 2008 1:15 AM
To: NBAFProgramManager
Subject: NBAF

To whom it may concern:

1|25.3; Butner is NOT the place for a Bio Lab. It is one of those last, best places left in which to live. There IS a
 2|21.0 health threat involved with any type of Bio Lab, no matter the planned security or care taken in
 monitoring. Few are advocating this location...fewer daily. Education and the light of day are the best
 arguments against the Butner location.

1 cont. | Please rethink the location and the public's reaction to a decision for the Bio Lab at Butner.
 25.3

Thank you.

Lorie Freeman

Comment No: 1 Issue Code: 25.3

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

Comment No: 2 Issue Code: 21.0

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

Freeman, M.S, R.N., CNE, Ellen

Page 1 of 1

WD0245

From: Freeman, Ellen [REDACTED]
Sent: Wednesday, August 13, 2008 12:06 PM
To: NBAFProgramManager
Subject: Need for security

1|27.0 | We absolutely need to up the Security at PLUM ISLAND!!! Lets not wait for another disaster.
Our citizens deserve the best protection that you can provide

Ellen T. Freeman M.S.,R.N., CNE

Comment No: 1

Issue Code: 27.0

DHS notes the commentor's opinion that security at the PIADC on Plum Island should be enhanced.