

Marshall, Marilyn

Page 1 of 1

PD0346

August 25, 2008

My name is Marilyn Marshall and I represent the silent majority of ██████████ Kansas.

I have three concerns that I think have not been heard before. If so, feel free to edit them.

1| 2.0 | Primarily, I'm concerned about Federal Government projects which have an appalling history of shoddy construction and environmental destruction. Some of the recent ones we know about are the Hanford Nuclear Facility, the Rocky Mountain Arsenal, and of course, the New Orleans levees. Closer to home, soil and water have been poisoned at Schilling Air Force Base in Salina, Kansas, and at the abandoned missile site near Wamego, Kansas. The public has little reason to believe that the NBAF Facility will be any different.

2| 23.0 | My second comment has to do with something that is not addressed, as far as I could tell, in the EIS. I found no discussion of modern day technology in the construction of the NBAF. No solar. No thermal. No bio fuels. No water recycling. Nothing. Is it too much to ask that a so called state-of-the-art facility address one of today's most pressing concerns?

3| 15.4 | And my third comment has to do with people, most importantly. This concerns the livelihood of hundreds of farm families that would be threatened just by the mere designation of Manhattan as an NBAF site. It could mean financial disaster. Once foreign markets learn of such a plan, it's likely they would discontinue their purchases of Kansas beef, and thus put an end to generations of farm family livelihoods.

This is the end of my comments.

Thank you.

Comment No: 1                      Issue Code: 2.0

DHS notes the commentor's lack of trust in the federal government.

Comment No: 2                      Issue Code: 23.0

DHS notes commentor's recommendation. DHS will document, review and incorporate all appropriate new and/or revised information for the NBAF final design.

Comment No: 3                      Issue Code: 15.4

DHS notes the commentor's concern. The potential effects to livestock-related industries is discussed in Section 3.10 of the NBAF EIS. As noted in 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 ban on all U.S. livestock products until the country was determined to be disease-free. The mainland sites have similar economic consequences regardless of the livestock populations in the region. It is beyond the scope of the EIS to speculate on reaction of foreign markets to the construction and operation of NBAF

**Marshall, William****Page 1 of 1**

WD0247

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**From:** [REDACTED]  
**Sent:** Wednesday, August 13, 2008 4:31 PM  
**To:** NBAFProgramManager  
**Cc:** [REDACTED]

**Subject:** Support for Athens, Ga NBAF

Department of Homeland Security  
245 Murray Lane, SW Bldg 410  
Washington, DC 20528

1|24.2 I am writing to urge you to select Athens Georgia as the home for the new National Bio and Agro-Defense Facility. I believe Athens has a lot to offer to you and the staff members who will be employed by the facility. Likewise, the NBAF has a lot to offer to Athens. Athens is a wonderful place to live, rich in community programs, diverse in population, and a safe place to raise children. I have been fortunate to live here for over 40 years and I have met many people who travel through Athens and then several years later find a way to return and settle in our community. I am certain your employees will find Athens a most pleasant place to live!

A public hearing is scheduled tomorrow where your representatives will receive public input concerning the NBAF. Unfortunately, I will be unable to attend. I have written the members of our county commission stating my support. I know that they favor the location of the NBAF in Athens. As you know, Athens is the home of the University of Georgia. As such, it is a place when free discussion of ideas is encouraged. I know you will hear from those who are opposed to the NBAF. I just wanted to let you know that there is also strong support for the NBAF in Athens. Please give careful consideration to selecting Athens. I hope your final analysis will reveal what a perfect fit Athens will be for the NBAF!

Cordially,  
William C. Marshall  
[REDACTED]

Comment No: 1

Issue Code: 24.2

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

**Martin, Harry**

**Page 1 of 1**

PD0273

August 24, 2008

I'm Harry Martin from [REDACTED] Mississippi. I am president emeritus of CDF, an economic development organization. I've served in economic development activities for fifty-two years and located approximately 300 businesses in the state of Mississippi. And we moved from all over the nation and other parts of the world about 1,000 families here to help us with our businesses and industries. And we found that these families were well accepted. They are very happy and most of them never left after they came here. We feel like the facility will draw professionals that will want to live here as the people have in Northeast Mississippi.

1|24.5 We would welcome the opportunity to have the NBAF facility in Flora or wherever you choose to put it in Mississippi.

Thank you very much.

Comment No: 1

Issue Code: 24.5

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

**Martin, Teresa**

**Page 1 of 1**

WD0249

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**From:** Teresa Martin [REDACTED]  
**Sent:** Thursday, August 14, 2008 4:46 PM  
**To:** NBAFProgramManager  
**Subject:** National Bio and Agro Defense Facility

1|24.5 | I would like to say that I think the National Bio and Agro Defense Facility would be a great asset to Flora.  
Flora and the surrounding community would be a great area for the facility to locate to. I am all in favor  
2|15.5 | for this industry to help our economic growth and quality of life for our citizens. Please select Flora as the  
site for the NBAF.

Teresa Martin  
[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.

Martin, William

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MD0012



**TEXAS  
HISTORICAL  
COMMISSION**  
*The State Agency for Historic Preservation*

RICK PERRY, GOVERNOR  
JOHN L. NAU, III, CHAIRMAN  
F. LAWRENCE OAKS, EXECUTIVE DIRECTOR

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July 16, 2008

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

Re: Project review under Section 106 of the National Historic Preservation Act of 1966  
National Bio- and Agro-Defense Facility, Bexar and Medina Counties (Homeland Security)

Dear Mr. Johnson:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed federal undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Bill Martin, has examined our records. Our records show that there are no cultural resources recorded on the tract proposed for development. However, the tract has never been surveyed for cultural resources, and occupies a landform that may contain intact archeological deposits. If the Texas Research Park location is selected for construction, we believe a professional archeologist should survey the tract prior to initiation of ground disturbing activities.

The work should meet the minimum archeological survey standards posted on-line at [www.thc.state.tx.us](http://www.thc.state.tx.us). A report of investigations should be produced in conformance with the Secretary of the Interior's Guidelines for Archaeology and Historic Preservation, and submitted to this office for review. In addition, any buildings 45 years old or older that are located on or adjacent to the tract should be documented with photographs and included in the report. You may obtain lists of archeologists in Texas on-line at: [www.counciloftexasarcheologists.org](http://www.counciloftexasarcheologists.org) or [www.rpanet.org](http://www.rpanet.org). Please note that other potentially qualified archeologists not included on these lists may be used.

Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Bill Martin at 512/463-5867.**

Sincerely,  
  
for  
F. Lawrence Oaks, State Historic Preservation Officer

FLO/wam

Comment No: 1      Issue Code: 14.6

DHS notes the information provided by the State Historic Preservation Officer.

**Martinez, Heather**

**Page 1 of 1**

**PD0251**

August 23, 2008

1| 25.4

Yes. Hello. My name is Heather Martinez and I would just like to comment that I would be in support of not having this particular program being...becoming available in Manhattan, Kansas. I am a house care provider and know that it's very important to study diseases. But do not feel that at this time that Manhattan, Kansas would be the place to set up this a...government accountability office, where they will be conducting these studies with this highly infectious animal disease causing virus. I think this needs to be in a very controlled environment. And just the literature that I've seen just is a little alarming and startling. I do have a packet of information actually that was given to me and I do intend to look online to read some more about this but, at this time, I would strenuously object to having a facility put out in the heartland.

Thank you very much.

Comment No: 1

Issue Code: 25.4

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

Mason, Cecil

Page 1 of 1

WD0655

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**From:** Cecil Mason [cmason@lawsconstruction.com]  
**Sent:** Friday, August 22, 2008 4:52 PM  
**To:** NBAFProgramManager  
**Subject:** Bio and Agro Defence Facility

To whom it may concern

1|24.5 | I support the National Bio and Agro Defense Facility coming to Flora Mississippi.

Cecil Mason  
Project Manager/Estimator  
Laws Construction Company Inc.  
EMail cmason@lawsconstruction.com  
PH. 601-933-1990  
Fax 601-933-1960  
Cell 601-624-2241

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Laws Construction has had this message scanned for viruses by Message Labs.

Comment No: 1      Issue Code: 24.5

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

Masterson, Hannah

Page 1 of 1

NYD001  
Hannah Masterson 1/28/08

The NBAF-EIS analysis of the possible environmental impacts of siting, constructing and operating the proposed NBAF Plum Island site fails to note that:

1. from Greenport to Orient Point there is only a two lane highway and that from East Marion to Orient is a causeway with wet lands and/or water on either or both sides  
It is use by construction vehicles and the estimated 250-350 direct job holders and 4,300-6,000 temporary employees will have a dire, ongoing environmental impact. (no measurable cumulative effects ES-9!)
2. from Orient Point to Plum Island the above increases in workforce and vehicles will overwhelm the available facility and roadways
3. there is no proximity to BSL-3, BSL-4 research programs (ES-4)
4. there has been difficulty in attracting world class researchers, scientists or skilled technicians (Due to lack of affordable housing and transportation most workers take the ferry from Conn. > ES-4)

218.15: no consortium of universities, foundations, research, Biomedical and technological facilities are available to Plum Island

6. insufficient infrastructure + utilities (c. 1953)
7. Greenport not Greenfield
8. only Southold police not Greenport-Southold (ES 8-9)
9. insufficient community support (ES-4)

ES 18 General conclusion:  
"No problems but if it is a problem less than the other sites!  
in transportation, in housing  
in consortium and in community support!

Hannah Masterson 3/11

There is ample evidence of scholarship, awards and dedication in both written and oral presentations

A concern that Plum Island does not meet the evidence and does not a proper ground on the selection process

1/26.0 cont

Thank you!

Comment No: 1 Issue Code: 26.0  
DHS held a competitive process to select potential sites for the proposed NBAF as described in Chapter 2, Section 2.3.1 of the NBAF EIS. A multi-disciplinary team of engineers, scientists, lawyers, academics and communicators from the departments of Homeland Security, Agriculture, Health and Human Services, and Defense reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the EIS as alternatives for the proposed NBAF. The effects to the roadways and waterways due to construction were evaluated in Section 3.11.6 of the NBAF EIS.

Comment No: 2 Issue Code: 8.1  
DHS notes the commenter's concern regarding the adequacy of the utility infrastructure to support the NBAF operation at the Plum Island Site Alternative. Section 3.3.6 of the NBAF EIS includes an assessment of the current infrastructure, a discussion of the potential effects from construction and operation of the NBAF, and the identification of any infrastructure improvements necessary to meet design criteria and insure safe operation. Should a site be selected for NBAF, any needed infrastructure improvements to ensure service reliability would be identified in accordance with the final facility design.

Matthews, Dexter

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FD0094



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Daniel R. Matthews, Director

Michael F. Basley, Governor  
William O. Ross Jr., Secretary

MEMORANDUM

TO: Malba McGee  
Office of Legislative & Intergovernmental Affairs

FROM: Dexter Matthews  
Director

DATE: August 20, 2008

SUBJECT: Project Number: 08-0390  
County: Cravenville

The Waste Management Division has reviewed and commented on the above referenced project.  
Please find enclosed comments.

Should you have additional questions, please feel free to contact our office.

DRM/hm

Enclosures

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08/22/2008 14:35 9197159868 NCDENR  
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Aug 25 2008 10:58 P.12 FAX:919-723-9571 NCDENR

Matthews, Dexter

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FD0094



**North Carolina Department of Environment and Natural Resources**  
 Division of Waste Management

Dexter R. Matthews, Director      Michael F. Easley, Governor  
 William G. Ross Jr., Secretary

July 8, 2008

To: Dexter Matthews, Director  
 Waste Management Division

From: Ted Cashion, Supervisor *TC/KG*  
 Eastern Region Compliance Branch

RE: Draft Environmental Impact Statement  
 US Department of Homeland Security  
 National Bio and Agro-Defense Facility  
 Butner, NC

1|1.3 The Hazardous Waste Section has reviewed the above referenced project and offers the following comments. The proposed 520,000 square foot National Bio and Agro-Defense Facility would provide animal testing capability needed for the licensure of the human disease vaccines, defend against high-consequence human and foreign animal diseases in livestock, and provide the essential departmental infrastructure requirements for threat characterization, forensics, and detection. Construction and operation of this facility would generate construction debris, sanitary waste, solid waste, wastewater, medical wastes, biohazardous wastes, hazardous wastes, and industrial solid wastes.

2|18.3 Wastewater will be pretreated prior to discharge to the POTW. Solid and liquid wastes generated in laboratories would be considered biohazardous and treated by sterilization, chemical disinfection, and/or incineration. Air quality concerns may be generated with the use of the incinerator. Any solid wastes generated must be managed properly.

2Cont|18.3; 3|9.3 Hazardous waste generated in laboratories must be properly managed (i.e., containerized and manifested to a permitted Transfer, Storage, or Disposal Facility). The facility must notify as a large generator of hazardous waste if the facility generates >2200 pounds (large generator) of hazardous waste in a calendar month, or notify as a small generator of hazardous waste if the facility generates >220 pounds but <2200 pounds in a calendar month. The facility must follow the appropriate regulations.

This office has no objection to the proposed project.

If you have any questions, please contact me at 919-508-8557.

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08/22/2008 14:56 91971539860 NCDENR

Aug 25 2008 10:58 P.13

Comment No: 1      Issue Code: 1.0  
 DHS notes the commentor's statement. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

Comment No: 2      Issue Code: 18.3  
 DHS notes the commentor's observations regarding wastes produced from construction and operation of the NBAF.

Comment No: 3      Issue Code: 9.3  
 DHS notes NCDENR's air quality concerns. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the Umstead Research Farm Site are discussed in Section 3.4.7. Air pollutant concentrations 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.

Matthews, Dexter

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FD0094



**North Carolina Department of Environment and Natural Resources**  
Division of Waste Management

Dexter R. Matthews, Director      Michael F. Easley, Governor  
William G. Ross Jr., Secretary

July 24, 2008

**MEMORANDUM**

**TO:** Dexter R. Matthews, Director  
Division of Waste Management

**THROUGH:** Jim Bateson, Head, Site Evaluation and Removal Branch  
Superfund Section

**FROM:** S. French, Environmental Chemist  
Superfund Section

**SUBJECT:** National Bio and Agro-Defense Facility (NBAF)  
Umstead Research Farm Site, Butner, (Granville County)

11/18.3  
4/18.3

I have completed the review of the subject project for the proximity to CERCLIS or inactive hazardous waste sites and have consulted with Ms. Mari Morgan, the State project manager for the Camp Butner site, regarding the potential effects of the proposed project. The project involves site selection for the construction of facilities for the National Bio and Agro-Defense Facility (NBAF). One possible site is on 195 acres of land that is part of the NC Department of Agriculture Umstead Research Farm. This site would be located about 1.0 mile northwest of Butner, NC.

5/18.3

Initially, three CERCLIS sites and one from the NC Inactive Hazardous Site Branch (IHSB) inventory were found to be located within a four-mile radius from this project. These sites are briefly described below and are denoted on the attached map.

The three CERCLIS sites: Mead Containers (NCD 991 278 870), Athol MFG Corp (NCD 072 003 635), and Zapata Industries Inc. (NCD 091 576 093) have been moved to the CERCLIS Archived Sites list. Both the Mead Containers Site and the Zapata Industries Site have a No Further Action status from the IHSB. The Athol MFG Corp. Site is undergoing remediation under the oversight of the IHSB. These three sites are located in Butner at about 2 miles southeast of the project.

6/11.3

The Range Road Burn Site (NONCD 000 0025), at about 0.3 miles northeast of the project, is on the Priority List of the IHSB due to lead and cadmium contaminated soils.

After reviewing the file information, I believe it is unlikely that the project will

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NCDENR      FAX: 919-733-7333-9371      Aug 28 2008 10:59 AM      P.14      16/23

Comment No: 4      Issue Code: 8.3

DHS notes the commentor's statement.

Comment No: 5      Issue Code: 18.3

DHS thanks the North Carolina Department of the Environment and Natural Resources (NCDENR) for their review and comment on the hazardous waste aspects of the construction and operation of the NBAF. DHS is familiar with the inactive hazardous waste site and the CERCLIS sites in the vicinity of the proposed NBAF location and has reached the same conclusion as NCDENR, that it is unlikely that contamination that may be present at these sites would impact the construction and operation of the NBAF. DHS is also familiar with the U.S. Army Corps of Engineers Engineering Evaluation/Cost Analysis for Former Camp Butner and agrees that a site evaluation using instruments to detect buried, unexploded ordnance (UXO) may be prudent prior to the commencement of earth-moving activities.

Comment No: 6      Issue Code: 11.3

DHS notes the commentor's concern for the N.C. listing of the Range Road Burn Site. The NBAF EIS Section 3.7.7.1.3 describes the state and federal databases that list the Range Road Burn Site. The N.C. Inactive Hazardous Waste Section includes the Range Road Burn Site on the State Priority List.

Matthews, Dexter

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FD0094

affect these hazardous waste sites or vice versa.

5ContJ6.3

The US Army Corps of Engineers July, 2004 report titled Engineering Evaluation/Cost Analysis for the former Camp Butler indicated that a Grenade Training Range was located about 0.20 miles southeast of the project (Ref: Maps 1 & 2). This location was based on historic maps and a records review of activities at Camp Butler (Ref 2). A digital geophysical survey using Time Domain Metal Detectors and hand held metal detectors was conducted of this area and an adjacent grid designated as ASG0012 followed by excavation of qualified anomalies (Maps 1 & 2). This intrusive investigation did not reveal any ordnance related items. Three other grid areas that are closest to the project were investigated. One (ASG0016) was located just outside the eastern perimeter of the project. Some non ordnance-related scrap metal was found. The second grid (ASG0019) was located just inside the northern border of the project area near an old road. It gave a false positive from a tree stump. The third grid (ASG0018) was located 0.1 miles northwest of the project. A pressure plate from an M1 anti-tank practice mine was found in this third grid.

5ContJ6.3;  
6ContJ11.3

6ContJ11.3

The main area of the project site has had no geophysical investigation. Appropriate due diligence on the part of the developer of this facility might include site evaluation using metal detection instruments followed by removal of ordnance items, if found, prior to earth-moving activities. It is also recommended that Mr. John Baden of the US Army Corps of Engineers (910-251-4754) be kept informed of the project's progress. If you have any questions, please call me at (919) 508-8455.

Attachments: Map 1 & Map 2  
cc: Jim Bateson  
Marti Morgan

References:

- (1) Silkenbakken, Don, PE, Parsons Infrastructure & Technology Group, Inc., Final Engineering Evaluation/Cost Analysis for Former Camp Butler Site. (Prepared for U.S. Army Corps of Engineers) July 2004.
- (2) U.S. Army Corps of Engineers, Rock Island District and U.S. Army Defense Ammunition Center and School, Illinois, Archives Search Report Findings for the Former Camp Butler. September 1993.

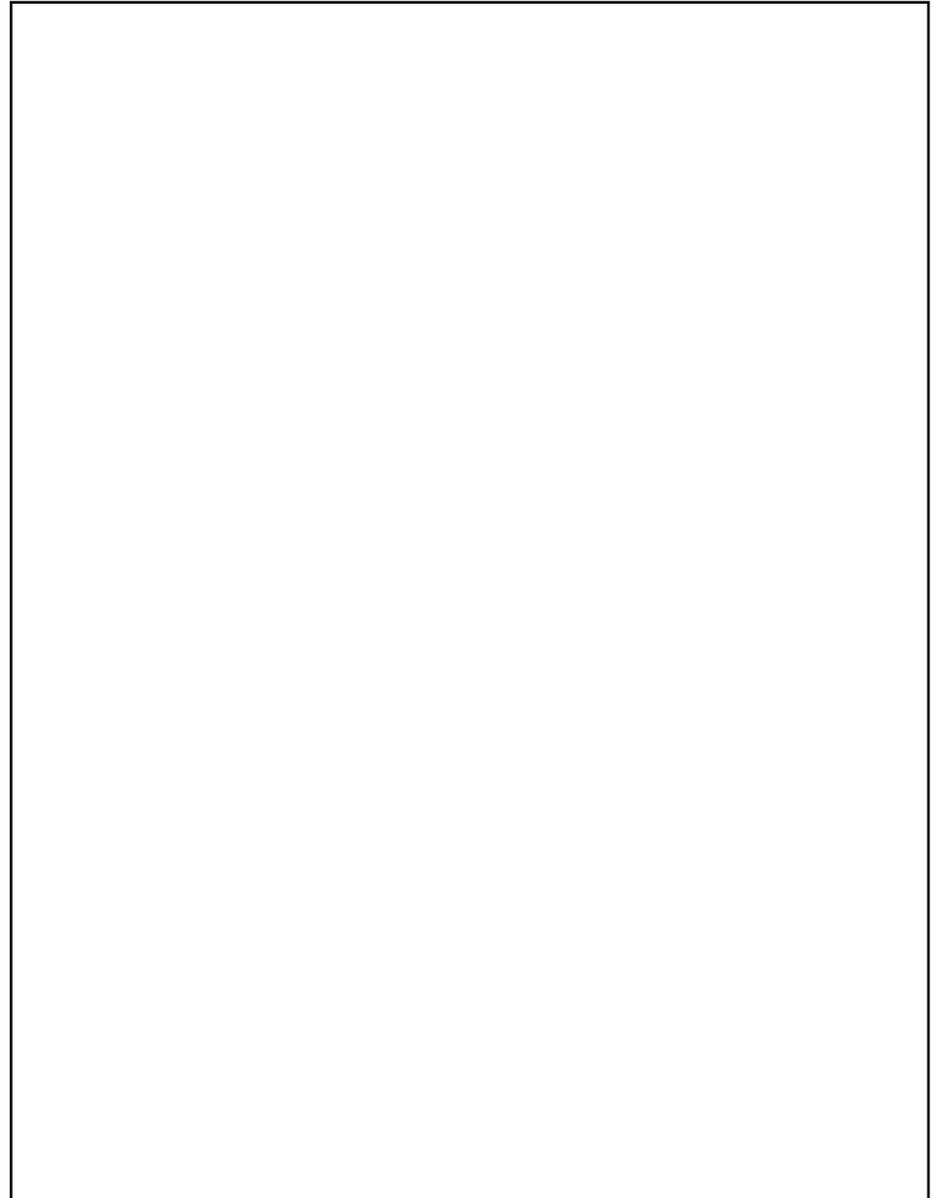
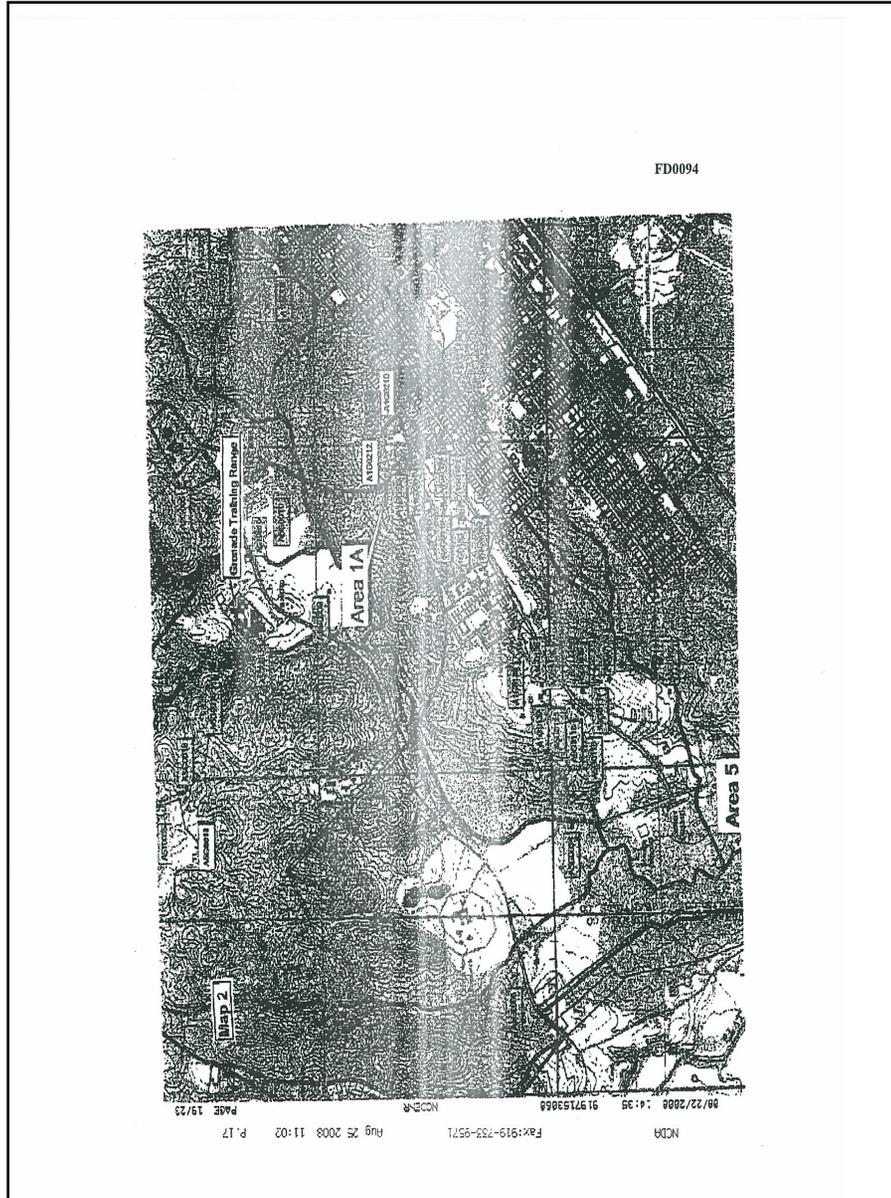
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NCM  
Fax: 919-733-5571  
Aug 25 2008 10:59 P.15  
PAGE 11/23  
88/22/22/2008 14:35 9197339883 NCMEN



Matthews, Dexter

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## Maughmer, Roger

## Page 1 of 2

WD0769

**From:** Roger Maughmer [roger@simmonsco.net]  
**Sent:** Monday, August 25, 2008 3:58 PM  
**To:** NBAFProgramManager  
**Subject:** Support of NBAF at Manhattan Kansas

To: nbafprogrammanager@dhs.gov  
 Subject: NBAF in Manhattan, KS  
 U.S. Department of Homeland Security  
 Science and Technology Directorate  
 James V. Johnson  
 Main Stop #2100  
 245 Murray Lane, SW  
 Building 410  
 Washington, DC

Dear Mr. Johnson,

1| 5.4 I am writing in support of the location of the NBAF facility in Manhattan, Kansas. I have been a resident of Manhattan for approximately 33 years and have served on our City Commission and held the post of Mayor of Manhattan in 1993-94. In addition, I have served on the County Law Board, Chamber of Commerce Board of Directors, the Riley County Health Board, am a past President of the Association of the United States Army, and have served in many other volunteer capacities in our community.

2| 5.4 During my years of service in our community I have become well aware that there are always those who are against nearly everything and they often have the ability to be vocal far beyond their numbers. Usually they are the same individuals who are against nearly everything? Please be assured a majority of citizens in this community recognize the benefits as well as realize the possible consequences of our support of Manhattan as a location for the NBAF. The cost benefit analysis seems to be favorable for our location.  
 3| 15.4

4| 1.0 I would like to assure you that a majority of Manhattan citizens view the NBAF facility as being essential to the protection of our national food supply. We all are aware of the extraordinary capabilities of Kansas State University to be a viable source of support for this vital research. I feel the synergies offered by our location are limitless, specifically due to the proximity to KSU and the other research facilities in this general region.  
 5| 8.4

Respectfully Submitted,



Roger E. Maughmer

Comment No: 1                      Issue Code: 5.4

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

Comment No: 2                      Issue Code: 5.4

DHS notes the commentor's opinion.

Comment No: 3                      Issue Code: 15.4

DHS notes the commentor's support for the Manhattan Campus Site Alternative. The economic effects of construction of the NBAF at the Manhattan Campus Site Alternative are included in Section 3.10.4 of the NBAF EIS.

Comment No: 4                      Issue Code: 1.0

DHS notes the commentor's statement. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

Comment No: 5                      Issue Code: 8.4

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

**Maughmer, Roger**

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WD0769

901 Allison Ave.  
Manhattan, Kansas 66502  
Roger Maughmer  
The Simmons Company  
3202 Kimball Ave  
Manhattan, KS 66502

TEL - 785-539-6531  
FAX - 785-539-1433

Mauricio, Ph.D., Rodney

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WD0292

**From:** Rodney Mauricio [REDACTED]  
**Sent:** Friday, August 15, 2008 3:46 PM  
**To:** NBAFProgramManager  
**Subject:** public comment on NBAF

DHS --

1|24.2 | I am writing in full support of siting the NBAF in Athens, GA. I live  
 within 5 miles of the proposed site and drive by it every day. I am a  
 faculty member (ecological genetics of plants) at the University of  
 Georgia and do research at the State Botanical Gardens next door to  
 the proposed site. I have read the draft EIS and am convinced that  
 all necessary precautions will be taken by DHS to make this a safe  
 facility.

2|2.0 | Friends in the community seem evenly mixed about NBAF, but I will say  
 that all the opponents that I know really have no idea what this  
 facility will do -- they are convinced that you will be making  
 biological weapons. When I discuss the global threats in emerging  
 diseases (without bringing up NBAF), all agree that we need to study  
 these -- but NBAF brings up these images of bio-weapons. Most of my  
 1 cont. | colleagues at the University are very supportive of the facility and  
 24.2 | the synergy that the Vet School and CDC bring to the mix.

Sincerely,

Rodney Mauricio, Ph.D.  
[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: 2.0

The NBAF's mission is defensive and would not involve offensive bioweapons research or development. The international treaty, known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

May, Cheryl

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WD0205

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**From:** Cheryl May [REDACTED]  
**Sent:** Wednesday, August 06, 2008 5:00 PM  
**To:** NBAFProgramManager  
**Subject:** Draft EIS comments

Hello,

I am writing to support bringing the NBAF to Kansas.

1|24.4

As author of a textbook, "Cattle Management," published by Reston Publishing Company, a division of Prentice Hall, I have an understanding of issues involving cattle. I believe such a facility is vital to animal health.

There could be no better place to locate such a facility than in the center of the nation and the center of cattle country.

At present, when cattle show signs of illness, it takes a long time to ship the sample far away to analyze it and check what it \*isn't.\* The results come back too slowly. A lab closer to where such information is needed would be much better. Results could be back sooner. If quarantines were needed, they could be started quickly, before more animals became infected.

I encourage you to site the NBAF in Kansas.

Cheryl May  
[REDACTED] Kansas

Comment No: 1

Issue Code: 24.4

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

Mayes, Bonnie

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WD0554

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**From:** Bonnie Mayes [REDACTED]  
**Sent:** Sunday, August 24, 2008 7:32 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF Athens Ga.

1) 5.2 | NBAF was put on Plum Island for a reason-to keep it far away from the general population-Keep it that way-far away from the general population!!

Bonnie

Comment No: 1      Issue Code: 5.2

DHS notes the commentor's suggestion. 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.

Mayes, Bonnie

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WD0029

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**From:** Bonnie Mayes [REDACTED]  
**Sent:** Tuesday, July 01, 2008 11:17 PM  
**To:** NBAFProgramManager  
**Subject:** plum island

1| 25.2 NO Bio-lab in Athens Ga. Keep it on the island!!  
2| 24.1

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: 24.1  
DHS notes the commentor's support for the Plum Island Site Alternative.

Mayes, Marie

Page 1 of 1

CD0701

**From:** info@athensfaq.org on behalf of Marie Mayes [REDACTED]  
**Sent:** Wednesday, August 06, 2008 7:21 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Athens, Georgia

Dear NBAF Program Manager,

- 1) 18.2 | How can we as a community evaluate the environmental impact of incineration of thousands of pounds of infected carcasses in Athens, GA when the DEIS only mentions it as a possibility?
- 2) 23.0 | Is incineration likely? When will you disclose what is required by NEPA regarding incineration as a disposal method? What alternate method might be used and what are the impacts?
- 3) 25.0 | We are strongly opposed.

Sincerely,  
 Marie Mayes

Comment No: 1                      Issue Code: 18.2

As discussed in Section 3.13.1.2 of the NBAF EIS, several different technologies are 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. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, the evaluation in Section 3.3 (Sanitary Sewage) assumed that alkaline hydrolysis is used for carcass disposal.

Comment No: 2                      Issue Code: 23.0

DHS notes the commentor's concern. Disposal and decontamination (killing or inactivation of bacteria and fungi and viruses, respectively) procedures have a long and proven history of effectiveness when facilities are well maintained and procedures followed. 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. Section 3.14 and Appendix E of the NBAF EIS, identifies 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. Section 3.13 of the NBAF EIS describes the processes that would be used to control and dispose of liquid and solid waste from the NBAF and Sections 3.3 and 3.7 of the NBAF EIS describes standard methods used to prevent and mitigate potential effects of spills and runoff. Since the method of carcass disposal has not yet been determined, the effects of alkaline hydrolysis, rendering and incineration were included in the analysis presented in Section 3.13 of the NBAF EIS. Incineration has the potential to affect air quality, so the evaluation in Section 3.4 (Air Quality) assumed only incineration would be used to assess the greatest adverse effect. Alkaline hydrolysis and rendering would have the greatest effect on sanitary sewage capacity, Section 3.3, so the sanitary sewage effects were determined using these method.

Comment No: 3                      Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF.

Maynard, Linda

Page 1 of 1

WD0126

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**From:** [REDACTED]  
**Sent:** Monday, July 28, 2008 6:15 PM  
**To:** NBAFProgramManager  
**Subject:** DEIS

1|2.0 Can you send me a copy of the DEIS in the mail- [REDACTED]  
My comments are : I have read a DEIS before and know that they are full of speculation and lack facts.  
As I understand this particular one is missing some information that should have been obtained in it.  
Many items are conveniently "omitted" in these "reports". This particular report already needs to be updated. Citizens cannot trust our government officials on ALL levels to tell the truth- to give the FACTS- it is left up to us to get to the REAL truth and facts.

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Comment No: 1      Issue Code: 2.0

DHS notes the commentor's lack of trust in the federal government.

Maynard, Linda

Page 1 of 2

WD0820

From: [REDACTED]  
 Sent: Monday, August 25, 2008 5:59 PM  
 To: NBAFProgramManager  
 Subject: proposed NBAF

- 1| 5.3 | Regarding the proposed lab- the no action alternative is the preferred option, however for the purposes of these comments/findings this is in reference to the proposed Umstead site in Butner, N.C. This site should not be considered an option. Reasons are given along with references to the DEIS.  
 One of the reasons is lack of community acceptance. (as outlined as one of the four evaluation criteria in the site selection process. (ES-4) Also stated in the DEIS are reasons for site elimination. One of the four criteria for this is insufficient community support. (ES-4) This is the case concerning the Umstead site. Many key N.C. officials, including government, town, county, etc., also citizens and businesses near this site are in opposition to this lab. Therefore this site should not be considered as an option.  
 It was suggested in the DEIS that the NBAF be constructed in a remote location such as an island distant from animal hosts and vectors. (ES-6) Although this alternative was eliminated this puts doubts how failproof this lab would be concerning containment of diseases.
- 2| 9.3 | Air quality- as stated in the DEIS, preliminary assessments indicate that the lab would not LIKELY affect regional air quality. (ES-7). This is speculation. VOC's will be emitted and it is with special concern with the possibility of an incinerator as well. N.C typically experiences yellow, orange and red ozone alert days during spring through summer months. Air quality will likely be affected.
- 3| 11.3 | Geology and soils- As stated in the DEIS- erosion control measures would minimize any adverse effects from construction and operation. (ES-8,9). Again speculation. This will only occur if these measures are enacted and policed. This cannot be guaranteed. Erosion control laws are often violated. A recent incident occurred in the Apex (Wake county) community park. (trail construction) improper barriers etc. fouled a stream. Proper protocols cannot be guaranteed.
- 4| 13.3 | Biological resources- It states that threatened or endangered species, aquatic resources, and wildlife would not be DIRECTLY affected by the site choice. (ES-8) Again speculation. An accidental release of pathogens would adversely affect susceptible wildlife populations. (ES-8).
- 5| 17.3 | Traffic and transportation- It states- Roads near the Umstead site would see daily traffic volumes increase approximately 500%. This will only add to congestion and lower air quality, increased exhaust emissions and add to increased pollution, esp. during ozone alert days that N.C. experiences.
- 6| 19.3 | Health and safety- It states- Standard safety protocols would minimize the likelihood of accidents and personal injury at the NBAF. (ES-9) Again speculation. There is no proof to guarantee this. There is also no proof that there will not be development, production, and stockpiling of biological and toxin weapons although the named treaty prohibits this. (1-2). There is also no guarantee that an outbreak like the one that occurred in England in 2007 (1-3) won't happen here. There is also no guarantee that operating procedures will be followed to minimize the potential for LAIs and accidental release from the lab. (2-3) Again speculation. There is also no guarantee that protocols would be followed during the construction of the lab. There are also no guarantees that proper safety measures would be followed pertaining to transportation of hazardous materials, chemical storage and use and pollution and spill prevention. (2-7, 2-8)
- 7| 3.0 | APHIS- There is no guarantee that the lab would be in compliance with the Animal Welfare Act. (2-9). Many violations occur yearly in labs all over the U.S. Many organizations have documented proof of violations and some law suits are filed as the result of violations against the AWA. The DEIS also states (regarding the animal facilities) what inspections CAN include, but again no guarantee that these will be followed through. (2-9)
- 8| 26.0 | Summary of environmental impacts and costs- No statement pertaining to costs from a possible environmental clean-up due to problems associated with the facility.
- 9| 15.3 | Environmental effects (spec. Umstead site)- Stresses on N.C.'s infrastructure will occur with increased population due to lab. Potential economic loss would be significant due to zoonotic diseases

Comment No: 1                      Issue Code: 5.3

Several factors will affect the decision on whether or not the NBAF is built, and, if so, where. The EIS itself will not be the sole deciding factor. The decision will be made based on the following factors: 1) analyses from the EIS and support documents; 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. DHS held a competitive process to select potential sites for the proposed NBAF as described in NBAF EIS Section 2.3.1. A multi-disciplinary team of engineers, scientists, lawyers, academics and communicators from the departments of Homeland Security, Agriculture, Health and Human Services, and Defense reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the NBAF EIS as alternatives for the proposed NBAF.

Comment No: 2                      Issue Code: 9.3

DHS notes the commentor air quality concerns. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS. Section 3.4.1 describes the methodology used in assessing potential air quality consequences at each site. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Section 3.14 describes the hazard and accident analysis including site specific consequences. Conservative assumptions were used to ensure the probable maximum effects were evaluated. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards. Should a decision be made to build NBAF and following site selection and final design, a complete emission inventory would be developed including VOCs and refined modeling performed as necessary in accordance with state-specific air quality permitting requirements.

Comment No: 3                      Issue Code: 11.3

DHS notes the commentor's watershed and erosion control concerns. The NBAF EIS Sections 3.6.7 and 3.7.7 specifically describe erosion control options for the Umstead Research Farm Site including but not limited to grassed swales, retention ponds and pervious surfaces. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 4                      Issue Code: 13.3

DHS notes the commentor's concern regarding migratory birds, endangered species, and other wildlife in the vicinity of the Umstead Research Farm Site. Sections 3.8.7.1.4 and 3.8.7.1.5 of the NBAF EIS provide descriptions of wildlife and endangered species that occur in the vicinity of the Umstead Research Farm Site. Furthermore, Section 3.8.7.1.5 describes the results of surveys for

endangered species and potential habitat that were conducted at the proposed Umstead Research Farm Site. The potential effects of the proposed NBAF on birds and rare and endangered species are addressed in Sections 3.8.7.2.4, 3.8.7.2.5, 3.8.7.2.5, and 3.8.7.3.5. The potentially impacted areas consist of disturbed scrub-shrub habitat that has been impacted by a recent clear cut. Approximately 200 acres of scrub-shrub habitat would be retained; along with streams, stream buffers, and mature forested communities that occur on the property. The Umstead Research Farm Site does not contain suitable habitat for migratory waterfowl. The EIS acknowledges the presence and importance of successional (i.e., scrub-shrub) habitats for neotropical migratory bird species. However, given the disturbed condition of the potential project area and the 200 acres of scrub-shrub habitat that would be retained, the NBAF is not likely to have significant long-term impacts on these species. The EIS indicates that the site does not contain suitable habitat for terrestrial rare or endangered species. Small headwater streams on site represent marginal potential habitat for rare mussel species that are known to occur outside of the proposed NBAF site; however, neither these streams nor their required Neuse River Watershed vegetated buffers would be impacted by the proposed NBAF. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Birds are not susceptible to diseases that may be studied at the NBAF. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of 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: 5                      Issue Code: 17.3

DHS notes the commentor's concern. A discussion of existing road conditions and potential effects to traffic and transportation from the construction and operation of the NBAF at the Umstead Research Farm Site Alternative is located in Section 3.11.7 of the NBAF EIS which has been revised to incorporate revised data. Based on the revised analysis, traffic associated with NBAF operations would increase the average daily traffic volume on Range Road by approximately 2.6% and on Old Route 75 by approximately 0.2%. Thus, the increase in traffic from the NBAF would be minor.

Comment No: 6                      Issue Code: 19.3

The NBAF's mission is defensive and would not involve offensive bioweapons research or development. The international treaty, known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. DHS's mission is to study foreign animal and zoonotic (transmitted from

animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

Comment No: 7                      Issue Code: 3.0

DHS notes the commentor's concern that the NBAF will not be operated in compliance with the Animal Welfare Act. DHS and USDA would ensure that the NBAF operation at the Umstead Research Farm Site will comply with all applicable local, state, and Federal regulations, to include the Federal Animal Welfare Act and regulations. In addition, oversight of NBAF operations, as described in Chapter 2, 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 Animal Research Policy and Institutional Animal Care and Use Committee (APHIS).

Comment No: 8                      Issue Code: 26.0

DHS notes the commentor's concerns about long-term funding for the NBAF to ensure safe operations. The U.S. Congress and the President are responsible for determining funding priorities for government programs. DHS spends funds in accordance with congressional intent. DHS would maintain the NBAF and ancillary facilities in compliance with applicable environmental, safety, and health requirements and provide for safe operation and maintenance.

Comment No: 9                      Issue Code: 15.3

DHS notes the commentor's concerns. Due to the small percentage of the overall population growth that would be attributed to the facility, the population increase associated with NBAF, which is discussed in Section 3.10.7 of the NBAF EIS, would have a negligible effect on the infrastructure.

Maynard, Linda

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WD0820

9 cont.| 15.3 | released (2-42). Aerial spraying of insecticides could directly affect communities and other populations. (2-42)

5 cont.| 17.3 | Infrastructure and traffic Improvements- (3-4) This will impact tax payers in a negative way.  
Electricity- Duke Energy would supply electricity to the Umstead site (3-48). Duke Energy is currently being sued to halt construction of a plant in Rutherford county, N.C. due to pollution concerns and ignoring a ruling. See article- southernstudies.org/facing south/2008/07/duke-energy-sued-ov. This is a red flag.

9 cont.| 15.3 |

2 cont.| 9.3 | Cumulative impacts- As stated- the potential for air emissions can only be estimated. And further stated- the NBAF would contribute to air emissions in the region, although the amount of contribution is not known at this time.

10| 12.3 | C.1.- N.C. experiences severe drought conditions. As stated, the NBAF would still contribute to the cumulative use of surface water in the region. (3-149). This would only contribute to the drought situation.

4| 13.3 | Terrestrial wildlife- The DEIS disregards the Migratory Bird Treaty and the Endangered Species Act. (3-198). This study also takes advantage of situations in regards to lack of species protection even if they are threatened or endangered. (3-199) Paragraph 3 & 4. Also lack of surveys done is of concern regarding specific species.(3-202).

8| 26.0 | Population- ERROR in paragraph (3-291) wrong site named. Shows inconsistency in statement.  
Population- 263 expected to relocate to study area (3-291). Hiring relocated persons does NOT help the employment status of N.C. It also adds extra strain on already overtaxed resources.  
RVF- Spreading virus via mosquitoes- As stated- the presence of multiple species of mosquitoes capable of transmitting the virus could make this site more prone to epidemic and endemic spread of RVF than the other site locations. (3-309)

1 cont.| 5.3 |

11| 18.3 | Operation consequences- Transporting waste to an appropriate off-site management facility (3-344). There is no safety guarantee that this "disposal" method is safe. I.E.- the explosion at the E.Q. storage plant in Apex, Wake Co., N.C. This site would generate more hazardous material to "store". Neighboring states would have to acquire some of this waste as well. Also more waste would go to landfills as well. The disadvantages listed (3-351) just adds to the risks and dangers associated with the lab.

1 cont.| 5.3 | FMD Spreads via (D-6)- Proof enough to adopt the No Action Alternative. FMD is one the most difficult animal diseases to control. (D-6) As stated- Accidental releases due to human error or maintenance failures still occur. (E-11) Paragraph 4.

8 cont.| 26.0 | In conclusion this DEIS is flawed with speculations, assumptions (3-2), unguaranteed data, heresay, disregards misc./applicable treaties, acts lacks field tests and specific evidence pertaining to safety aspects- from health risks (regarding surrounding environment and communities), to disposal methods and to the overall safety of the state of North Carolina. These comments/findings will be sent to state, local, county officials and to organizations of interest.

Submitted by [REDACTED]  
, la

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Comment No: 10 Issue Code: 12.3

DHS notes the commentor's drought concerns and DHS acknowledges the current regional drought conditions. As described in Section 3.7.7.3.1 of the NBAF EIS, the South Granville Water and Sewer Authority has 3 to 4 million gallons per day of excess potable water capacity and could meet NBAF's need of approximately 110,000 gallons per day, currently less than 0.4% of the Authority's total current capacity. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 210 residential homes.

Comment No: 11 Issue Code: 18.3

DHS notes the commentor's concerns regarding waste generated from NBAF operations. Section 3.13.2 of the NBAF EIS describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste. Specific waste management implications for the Umstead Research Farm Site are described in Section 3.13.8. DHS would ensure that generation, storage, and disposal of waste associated with NBAF construction and operations would be in compliance with all applicable environmental, safety, and health requirements; and Section 3.7.7 describes standard methods used to prevent and mitigate potential spills and runoff affects.

Mazer, John

Page 1 of 1

WD0760

**From:** Mazer, John R. [REDACTED]  
**Sent:** Monday, August 25, 2008 3:29 PM  
**To:** NBAFProgramManager  
**Cc:** [REDACTED]  
**Subject:** NBAF Site in Athens, Ga-opposed

1 | 5.2 | As an inhabitant of a neighborhood less than a mile from the site (as the crow or bacteria flies) I am  
 2 | 15.2 | deeply concerned about the proposed location for the NBAF facility in Athens, Ga. I am well aware of the  
 cont | 1 | 5.2 | passion local officials and UGA administration have for the placement of the facility in Athens based on  
 hope for new jobs and federal research grants. However, the site is too near residential areas not to  
 mention cattle farms.

3 | 21.2 | I understand the risks are quite small, but there is always the chance of human error or mechanical failure  
 4 | 26.0 | that could result in the one in a million accident. In the meetings it was mentioned that research would be  
 primarily on diseases that cannot be transmitted to humans. The implication of the wording suggests that  
 there may also be research on diseases that can be transmitted to humans. There are certainly instances  
 cont | 3 | 21.2 | where fool proof systems have failed in the US releasing dangerous materials or chemicals into the  
 atmosphere e.g. the nuclear plant in Pennsylvania or the train wreck in Graniteville, SC.

5 | 25.2 | For me, as a potential and unwilling neighbor in Oconee County Ga., the placement of the plant in Athens  
 6 | 24.1 | appears to be a bad idea. Plum Island offers a remote and safer site for this kind of research. Therefore  
 cont | 4 | 25.2 | you may consider this letter as opposed to the placement of the facility in Athens.

Comment No: 1                      Issue Code: 5.2

DHS notes the commentor's statement. The South Milledge Avenue Site was proposed by the local consortium in response to the request for expressions of interest and was considered along with the rest of the responses. DHS's alternative site selection process is described in Section 2.3.1 of the NBAF EIS.

Comment No: 2                      Issue Code: 15.2

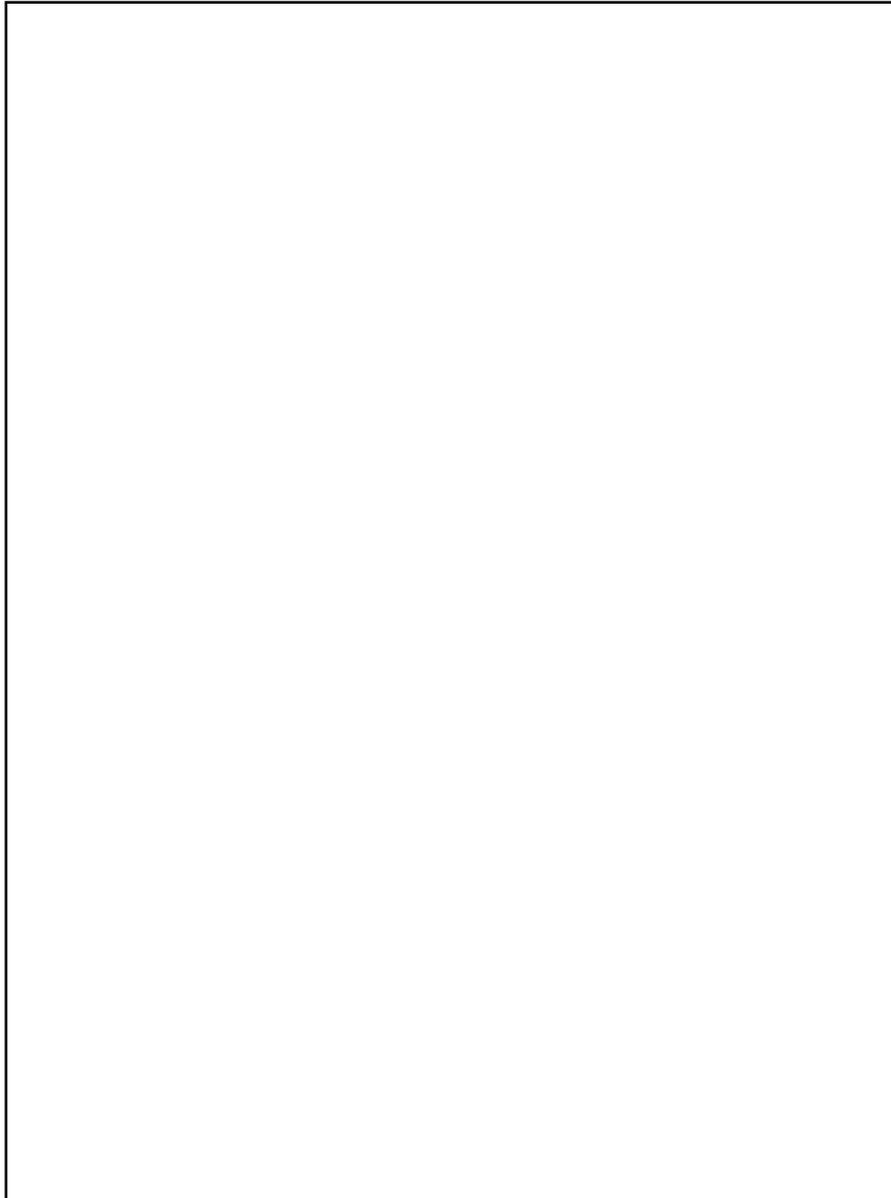
DHS notes the commentor's concern. The number of short-term and permanent jobs are discussed in Section 3.10. It is expected that approximately 2,700 direct temporary jobs would result from construction of the NBAF at the South Milledge Avenue Site, with many of the jobs being filled locally. Approximately 483 permanent jobs, including the initial 326 direct jobs, would result from operation of the NBAF. A portion of the permanent jobs at the NBAF will be filled locally and the household spending by new residents and the operations of the NBAF are expected to indirectly support additional jobs that will be filled by the local labor force.

Comment No: 3                      Issue Code: 21.2

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: 26.0

DHS notes the commentor's concern regarding the NBAF. As described in Chapter 1 of the NBAF EIS, DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and



emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.

Comment No: 5                      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.

Comment No: 6                      Issue Code: 24.1

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



McCallum, Margaret

Page 1 of 1

PD0298

August 25, 2008

1|25.4

We don't want a bio hazard lab that will have some of the world's pathogens...worst pathogens on the planet, in Manhattan.

This is Margaret McCallum from [redacted] Kansas, and we don't want that lab in Manhattan.

Thank you.

Comment No: 1

Issue Code: 25.4

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

## McClelland, Fletch

## Page 1 of 1

WD0574

**From:** [REDACTED]  
**Sent:** Sunday, August 24, 2008 3:50 PM  
**To:** NBAFProgramManager  
**Subject:** Opposition to NBAF in Athens, Georgia

Dear Mr. James V. Johnson, Program Manager:

1| 7.2 I am opposed to the NBAF lab locating, a short paddle upstream, in Athens--an urban center and the smallest county geographically in Georgia. Further, the site is one of the most beautiful pastoral settings in our community. If this is not enough, consider that waste water/materials released into the Middle Oconee River flows downstream to Greene County--site of the Reynolds Plantation/Ritz Carlton and lake homes owned by Republicans whose financial support has been substantial enough to invite personal visits by major GOP leaders...including George Bush.

2| 12.2 On a more modest and personal note, I grew up on a river in Maine and found my solace as a boy in the beauty of nature, so my wife and I located our home here outside Athens on the banks of the Middle Oconee--just downstream from the State Botanical Garden and now the proposed NBAF site. I serve the local population as a licensed counselor and still like to seek my solace by walking the sand bars and shallows of this river. The waste water from the NBAF site and thought of boiled carcasses processed then released into the river is disturbing. Further, the light pollution will take away from seeing the night stars. I am raising three boys and want them to have an appreciation of nature, beauty and things that elevate the human spirit. I would consider the NBAF a detriment to much of what I consider home.

cont. | 1| 7.2

3| 5.2 Please, do not forget the increased "moderate" risk to our local population, and if you must use Georgia for the location, find a more remote setting away from our urban area. The original placement exercised the wisdom of an island to reduce risk. Please, though I have mentioned partisan politics and other considerations that may simply be unique to this one citizen, act with care and good faith on this proposal.

Sincerely,  
 Fletch McClelland

Comment No: 1 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 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. Nighttime lighting could be mitigated with the use of shielded lighting and/or shielded fixtures that direct light downwards and can be used to keep light within the boundaries of the site and use of the minimum intensity of lighting that is necessary to provide adequate security.

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's watershed 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. Section 3.3.3.4 describes the Middle Oconee WWTP's influent limits and NBAF would have to meet the sewage acceptance criteria and pretreatment requirements.

Comment No: 3 Issue Code: 5.2

DHS notes the commentor's statement. The South Milledge Avenue Site was proposed by the local consortium in response to the request for expressions of interest and was considered along with the rest of the responses. DHS's alternative site selection process is described in Section 2.3.1 of the NBAF EIS.

McClelland, Julie

Page 1 of 1

WD0471

**From:** Julie McClelland [REDACTED]  
**Sent:** Friday, August 22, 2008 10:04 AM  
**To:** NBAFProgramManager  
**Cc:** Dara Buczynski  
**Subject:** Athens site

To whom it may concern:

1| 25.2 | I would like to express my opposition to locating the NBAF facility in Athens, Georgia. The risks associated with a lab of this nature are too  
 2| 12.2 | great to locate it near such a large population of people and animals. The proposed site is within yards of a major water source and  
 3| 13.2 | watershed, the Middle Oconee River. An accident of any magnitude could have far reaching effects that would devastate our community.  
 Even its presence would raise doubts in the minds of many as to the safety of the surrounding area and thereby cause economic fallout.  
 The size of the facility would ruin the pastoral setting of the State of Georgia Botanical Gardens, which is adjacent to the site, as well as the  
 property in Oconee County across the river. I realize the Federal government sees the lab as a necessity, but Athens is not the appropriate  
 site.

1 cont. |  
 25.2 |

Sincerely,

Julie McClelland  
[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 interest. The NBAF EIS Section 3.7.3 describes the water resources at the South Milledge Avenue Site alternative. Based on the current design, no direct Middle Oconee River impacts are anticipated.

Comment No: 3      Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden and wildlife populations. 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 dispersal between the State Botanical Garden and Whitehall Forest. Mitigation measures would include low impact development (LID) techniques, BMPs, and a stormwater pollution prevention plan; which would minimize the potential for adverse stormwater runoff impacts on aquatic species. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

McCrorry, Clint

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WD0819

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**From:** Clint McCrorry [REDACTED]  
**Sent:** Monday, August 25, 2008 5:58 PM  
**To:** NBAFProgramManager  
**Subject:** Athens GA

1|5.2 | After reviewing the pros and cons, especially the environmental impact statement, I strongly oppose locating NBAF in Athens.

Clint McCrorry  
Professor of Mathematics  
UGA

Comment No: 1      Issue Code: 5.2  
DHS notes the commentator's opposition to the South Milledge Avenue Site Alternative.

McDaniel, Kate

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WD0588

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**From:** Kate McDaniel [REDACTED]  
**Sent:** Sunday, August 24, 2008 11:58 AM  
**To:** NBAFProgramManager  
**Cc:** Chairman Melvin; Charles; Chuck & Beth; Grady Thrasher, III  
**Subject:** No NBAF Lab in Athens, GA - Attention Dr. Jamie Johnson  
**Attachments:** IMG\_4758-Small.jpg

August 23, 2008  
[REDACTED]

Dear NBAF Program Manager Dr Jamie Johnson,

Please add the following to the record of Athens, GA comments to the NBAF DEIS.  
Thank you,

Kate McDaniel,  
(I can see the proposed location of the NBAF Lab from My Bedroom Window about ½  
mile away.)

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Comment No: 1      Issue Code: 25.2  
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

McDaniel, Kate

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Grady Thrasher, III, Co-Founder

**NO BIO-TERROR LAB IN ATHENS - 8-14-08**

Expires: 01/01/2013 12:00 AM

Posted by: Kate on 08/15/2008 09:24 PM  
Updated by: Kate on 08/15/2008 10:20 PM

2/27.0

**Last Meeting with NBAF Officials at UGA  
Mahler Auditorium Brings Out Hundreds to  
Have Their Say**

Thursday, August 14, 2008

**Summary**

Two sessions were held: one at 12:30pm to 4:30pm and one at 6:00pm to 10:00pm. About 250 people attended each session. Three panelists gave a short presentation after which about 20 minutes were given to members of the audience to question them. They gave their answers. Then the public comment period began in which some 60 people (total) stood at the mike and made their points. Instructions were given for speakers to direct their comments to the panel of 3 (a representative from each of the agencies: USDA, NBAF and EIS Committee). Name and affiliation of each speaker was an option and so some comments below were not identified. All comments which were limited to within 3 minutes each, "were recorded and will be considered within the final Environmental Impact Study document to be published in the fall of 2008 along with the choice of location." Quotes may not be exact but rather paraphrased due to poor acoustics in the auditorium. My comments are given at the end of this document.

**Quote:**

"The Executive Summary and the body of the EIS (Environmental Impact Study) statement contradict each other. How can this be? The Summary is all most people have read including our local elected officials and newspaper reporters because everything said or written about the environmental impact in the Executive Summary is positive and yet the body of the 3-inch EIS document states numerous risks in all chapters. What are we to believe?" Grady Thrasher, originator of NO BIO-TERROR LAB IN ATHENS movement, a grass-roots organization composed of Oconee and Clarke residents in opposition to the Lab location in Athens.

Comment No: 1

Issue Code: 27.0

DHS notes the information provided by the commentor.

McDaniel, Kate

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Quote:

"Athens is an excellent location for this lab with it's scientists and collaboration of research." Clarke County Commissioner Doug Lowery.

Quote:

"Where will you get the water?" A question from an opponent of the NBAF which resulted in a standing ovation and loud applause from the audience.

Quote: "I have trouble with what to say. I am proud that the people of Athens can have their say in a meeting like this and respect each other. But what if we did no research? Could we survive an invasion of a deadly virus? " Doc Etheridge, Athens/Clarke Chamber of Commerce President.

Quote:

"If we don't have sufficient water here, then why are we still on the short list as a possible location?" Lady concerned about the droughts here and how much will citizens have to conserve to allow the bio-lab to have what it needs.

Quote:

"UGA has an obligation to the people of Georgia to protect our source of food from an outbreak. We are now eating food from all over the world and we could have all kinds of bugs coming to our shores. We need protection." A gentleman representing Dr Michael Adams, President of UGA.

Quote:

"We don't need a Level 4 bug lab here. It is a perfect target for a suicide terrorist attack." From a lady who read an article of a female of Eastern decent currently arrested and on her person was found detailed maps of the Statue of Liberty, Fort Detrick and Plum Island where the present NBAF Lab is located.

Quote:

"The Lab located in Athens would spur more growth. It would promote and enhance some 230 companies in this area that are presently involved with the study of life sciences." From a gentleman who owned one of the companies.

Quote:

"There is always a risk with any endeavor. This lab is no different." From the Vice Present of Georgia Power.

Quote:

"After having done a lot of research, I am comfortable with Athens as the location." Clarke County Commission Chairwoman Heidi Davison holding the Draft EIS 3-inch document with numerous colored markers projecting along the edge.

Quote:

"Of the 8 pathogens listed that will be studied, why are only 3 used as the upper boundary of risks? And what about the other 40 or so human diseases that could result from a possible release?" Cathy Prescott, wife of Grady Thrasher and co-founder of NO BIO-TERROR LAB IN ATHENS.

Quote:

"You say that the infrastructure will not be overburdened with the 326 more employees that will move here. With our drought and sewer situation, I truly find that hard to believe." Another resident that has been told to conserve water and sewer use.

Quote:

"Seems to me it would be wise to not put a lot of risk under one roof. Can this facility have several locations of smaller buildings?" Public comment, name

McDaniel, Kate

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unknown.

Quote:

"In the body of the EIS document, the phrase 'normal operation' is used frequently. Just what is meant by a normal operation? And when is an operation 'abnormal' and unacceptable? And what criteria is used to classify 'normal' and abnormal?" Grady Thrasher, Co-founder of NBTLIA.

Quote:

"The location will destroy the bird population because of the affects on birds of bright lighting at night. The botanical gardens was built at the present location for a reason - it's proximity to the river, the green pastures, the forest and all wildlife. I do not believe that you have considered the damage to wildlife in general that this lab would do. Please choose the Mississippi location as your ideal area." From a naturalists living in the area.

Quote:

"The EIS did not state the pros and cons of the damage to the Oconee River nearby and from which we get our drinking water further upstream. The banks will be destroyed by erosion; the ground water will be disturbed by dynamite blasting for the underground portion of the huge building. It is the worst case for the environment and yet not much is said about the impact on the environmental in an environmental impact study." April Engle, director of Rivers Network, main office located in Athens.

Quote:

"The Athens location is truly the worst selection. The climate is mild and humid with an extremely high insect (mosquito) population for most of the year, excellent conditions for an airborne release of a deadly pathogen. In addition there are hundreds, even thousands of animals on private farms all around. Instead of ideal, Athens is the worst location." From a cattle farmer and resident in the area.

Quote:

"I have worked at Plum Island in the lab and they have absolutely an airtight procedure for the maximum safety. I still collaborate with them today in my work here at UGA. This would be an excellent opportunity for many graduate studies as a spin-off of the NBAF Lab." From a scientist working in a lab at UGA.

Quote:

"I am affiliated with the UGA Research Enterprise and have seen the interaction of the State and private entities working together on many types of research. The structure and network for that is already in place and would give a jump start to the collaboration of many life science studies in the area. The Research community welcomes the Lab here in Athens." Mike Cassidy.

Quote:

"The State of Georgia welcomes the study of infectious diseases for animal agriculture in this vicinity. It will be an asset for animal disease research." President of Georgia Agribusiness.

Quote:

"My wife and I represent the average citizen who is busy going to work, raising a family, educating the little ones and do not have time to dig into all the voluminous information you have presented. It is too much to digest for the average person. We are not part of a consortium, nor do we have any powerful politicians among us. We are making an effort to reveal the hidden truth in all you say and publish. We cannot believe you would place out community at risk and keep the public in the dark. It is irresponsible to say the least. If Athens is chosen, we will sue; we will fight it every step of the way. It is obvious that a majority do not want that lab

McDaniel, Kate

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here. The best location is Plum Island." Grady Thrasher.

Quote:

"My question is about the mission of the NBAF. I'm reading quotes from scientists who represent other health institutions. They all refer to research on animal, plants AND HUMANS. The NBAF does not include research on humans. Just what is your mission?" Cathy Prescott wife of Grady Thrasher.

Quote:

"My comment comes to you from another viewpoint – the 'feel' standpoint. I believe we should re-thing our application of applied industry to our agricultural endeavors. We should ask ourselves, do we need a defense against agriculture? I was raised on a 100-acre farm and it is no industry." Tom Jenkins, retired from an Environmental Research career.

Quote:

"I applaud what you are doing and the careful consideration you have given for the selection criteria." From a female wearing a shirt with the letters: 'bio-safety trainer' and said that she is a member of the National Bio-safety Board.

Quote:

"I am a building contractor and do most of my business in Clarke County although I am a resident of Oconee County. I looked at my young son and decided I had to speak out against this thing. I could not betray him and his future. I made a promise to him that we will fight it – even with massive opposition on the site. You had better take us seriously and build this thing on Plum Island." From a speaker wearing a shirt with the letters 'Peace is priceless.' He received a standing ovation from the audience.

Quote:

"These level 4 Labs are built with many layers of protection, yet the scientists are laying their lives on the line to protect our nation. I worked at Plum Island and I felt safe." Paul Smith, a UGA researcher.

Quote:

"I worked at Plum Island and I know the work can be done safely in a close knit neighborhood. The collaborative effort here is spectacular." John Fisher.

Quote:

"I am an oceanography and do a lot of world travel. I read all of the EIS document. This nation desperately needs the animal disease research." From a UGA professor.

Quote:

"I am here to represent Senators Isakson and Chambliss who are in favor of building the BAF lab here in Athens." Lady in black.

Quote:

"This lab's construction and presence will not be good for the banks of the Oconee River. The River is critically damaged at some junctions and we are trying to repair it. Any disturbance in close proximity will surely have an adverse impact on its vibrancy." Dr Brenda Rashleigh, Ecologist with the US Environmental Protection Agency in Athens.

Quote:

"Nothing I have heard here tonight has convinced me that Athens is the best location. I brought up the lack of sufficient water and not one politician present tonight even mentioned that issue. They have spoken as if we've had no drought, as if water is no problem, as if the infrastructure is no problem (we don't have the sewer capacity for such a big demand). I think you are hiding the truth and the

McDaniel, Kate

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politicians and the powerful at UGA are trying to keep us in the dark. If you take us serious, you will put our concerns in the final report and take us off the list." A resident of the county - name not known.

Quote:

"I am a strong proponent of selecting Athens as the right location to build the level-4 Lab. We need the NBAF to replace the Navy School that we are loosing." Paul Chambers, CEO of AT&T in Athens.

Quote:

"The potential benefits are outstanding and the environmental impacts are minimal. Any venture of this nature requires that you weigh one against the other and make a decision." Male - name unknown.

Quote:

"I've heard pros and cons and I can understand both positions. My concern is that we are loosing beautiful areas like this to development every day. When is enough enough? Lets put our energies together and preserve the 67 acres to enjoy now and for the many in the far future." Dr Pat Priest, Oconee County resident.

Quote:

"You speak of transparency to promote trust. Transparency here is a joke. It is always human nature to cover up the real agenda or facts especially if the issue is controversial." A lady dressed in blue jeans and blue shirt.

Quote:

"Could you tell me why all the 5 sites that were selected for the short list are located in the South. Have you got something against our many years of economic prosperity down here? If Athens is chosen or any of the 5 is chosen, the quality of life in these places will be put on hold and eventually go down. Tourism will turn sour. Retirees will stop coming here. And you get the opposite of what you were aiming for. The prestige you are seeking will dissolve. I am disappointed in our politicians. \the place for such a lab is at Plum Island." From an Oconee County resident.

Quote:

"I have 2 concerns. 1) the monetary benefit and 2) the trust issue. I oppose this because somebody has pandered to you for the money if you decide to bring it here. I suspect that UGA proponents have indirectly bribed you for a decision in their favor thus we have trouble trusting your motives." A white male - no name given.

Quote:

"There has been no show of community acceptance to this lab being located in our community. If it is the location of choice, you can be assured we will fight you in the courts all the way and until the end." Matt Degennaro, Clarke County resident.

Quote:

"I've been listening carefully to all that has been said here tonight. What is prominent to me is that you are not trusted. Government agencies will tell you one thing and do another. We don't believe that it will be safe nor will it be a boon to the economy. We can't depend on what you've written or your word." From a retired university professor, Dr Cook, a resident who moved here from New York for a better quality of life.

Quote:

"Our county officials have asked us to conserve water by taking short showers every other day, flush our toilets less often and collect water in rain barrels for our plants. And they have the audacity to turn around and offer our water to locate a

McDaniel, Kate

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Level 4 lab here that will use 200,000 gallons per day!" From a 23-year old UGA graduate student.

The above is not a complete list of all comments made nor a list of all the commentators for the 2 sessions. The NBAF official at the meeting will have in his possession a complete recording of the entire evening including all comments so that they can be made a part of the final version of the EIS to be published before the end of 2008.

If submitted before August 25, 2008, additional comments can be made and sent to

Mail:

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

Web site:

<http://www.dhs.gov/nbaf>

Telephone:

1-866-501-NBAF (6223) 24 hour toll-free

FAX:

1-866-508-NBAF-(6223)

My observation:

\*\*\* UGA is the driving force behind this effort and they had all their forces out at the 12:30pm early session - professional organizations, State departments heads, faculty professors, research professors, politicians and others who depend on UGA for research.

\*\*\* At the second session that began at 7 pm on the same day, fewer UGA professionals and more of the environmental preservation advocates and even a mother with 3 small children concerned about their future, attended.

\*\*\* As the afternoon and evening wore on, the opponents became more verbal with significant issues that had not been explained in the publication and with questions that had not been answered. The final statement from the opponents promised to sue Homeland Security and the UGA if Athens is chosen and others promised to "stand in way of the bulldozers."

Personal Experience

\*\*\* Having worked for CDC for 10 years and for the U S Environmental Protection Agency for 20 years, my experience has been that all government officials will make a pretext of giving the public what they call "public input" to help them decide if the action they are about to take is fair and then ignore the input. By law, they must give the public a 60-day comment period, but have you noticed how they failed to advertise adequately at the beginning of the 60 days and before you know anything about the action that is about to be taken, the 60 days are up.

\*\*\* Federal officials like to have the power players on their side, be damn the little guy. Since most of our State and Federal powerful politicians are proponents, our comments and concerns will mostly be ignored. They will not be added to the final draft verbatim, but will be addressed in a general fashion so as not to sound

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committal.

\*\*\* Decision makers WILL NOT go with the location that has strong objection by local politicians (that leaves out NC); they WILL NOT choose a location whose residents in large numbers have threatened litigation; they SHOULD NOT select a location that does not have plenty of water and sewer capacity; and they SHOULD NOT select a location that has a negative environmental impact on the surrounding. It stands to reason that the Athens location will not be chosen, but then the government does not always do the logical. However, I predict that it will never be built here. But the fight must go on. We cannot be lax - just in case.

\*\*\* By the way, for those of you who do not know, my home of 40 years is in Brittain Estates across the Oconee River from the site location. I can see the grassy knoll from my bedroom window. We are downwind from the incinerators, less than 1/2 mile from the glaring lights, the noise, the stinking odor and the risk of an accident. Other entities which stand to loose their quality of life are those folks in Hickory Hills Subdivision, Broadlands Subdivision, all residents in other subdivisions on Simonton Bridge Road to the traffic light in Watkinsville, the Virginia Wells property along the banks of Oconee River across from the site just on the other side of the river and anybody else within a 6 mile radius of the center of the site. Furthermore, it will be adjacent to the Equestrian Center (across the road of the Forestry Office) which houses many horses and is the center of various shows that will be conducted there for public attendance. WHEN YOU THINK ABOUT IT, THE 67 ACRES IN ATHENS IS THE MOST UNLIKELY PLACE TO BUILD A LEVEL-4 LAB. Wouldn't you agree?

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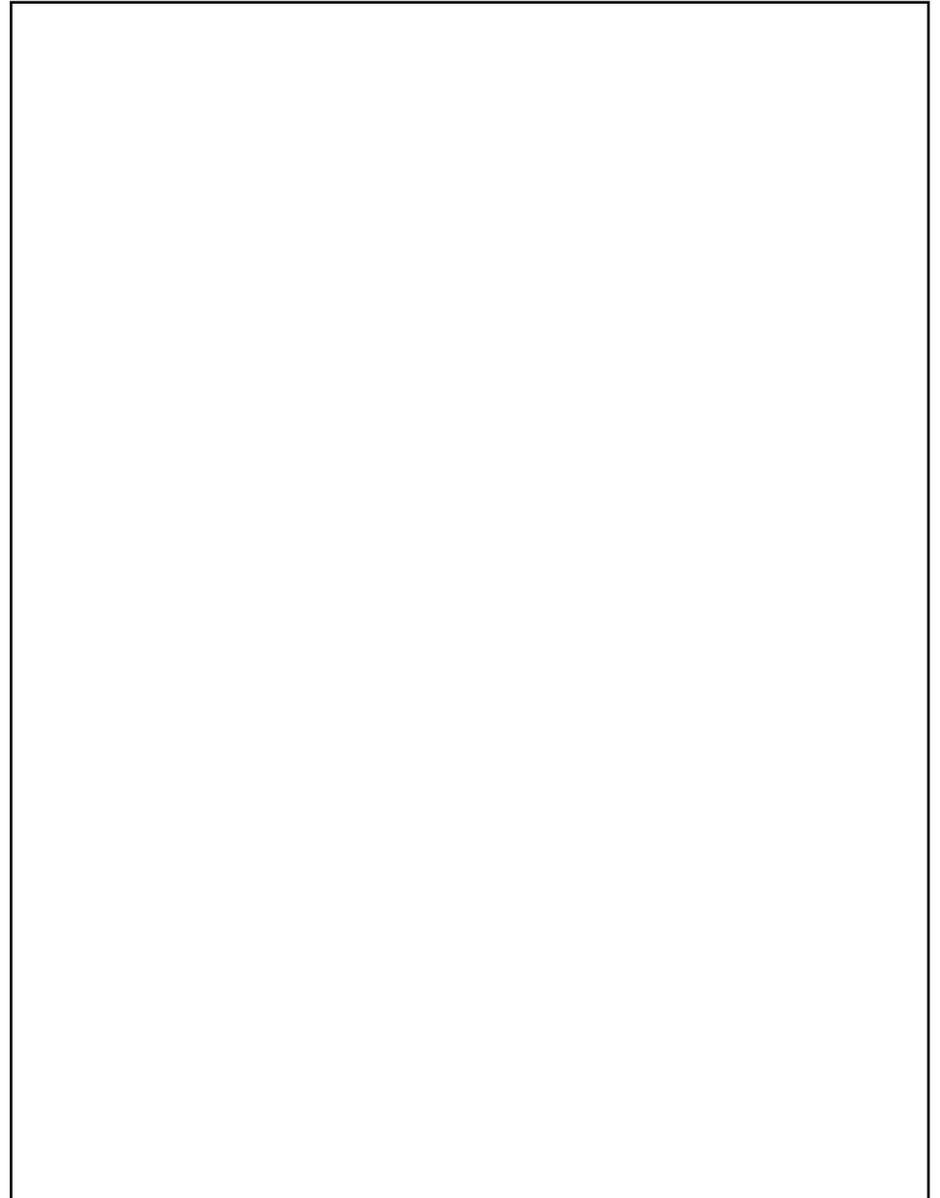
Kate

*Kate McDaniel*



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McDaniel, William

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WD0870

**From:** Wm McDaniel [REDACTED]  
**Sent:** Monday, August 25, 2008 10:51 PM  
**To:** NBAFProgramManager  
**Subject:** Proposed NBAF move to Athens, GA

To: NBAF Program Manager:

My name is William McDaniel and my home is in a neighborhood just across the river and at the approximate same elevation as your proposed NBAF site. Additionally, my home is downwind (prevailing winds) of the site and just a few hundred yards away.

My wife and I have worked our entire lives to purchase and improve our home site for our retirement years in a quiet secluded neighborhood that is dark at night and quite heavily populated with birds and animals and yes, mosquitoes.

1|21.2 | The siting of your lab in Athens will put us and our neighborhood in imminent danger within seconds of a release from the laboratory. You assure us that there is almost no chance of a release from the facility but both my wife and I have worked in laboratories all of our working lives and have witnessed incidents where the most stringent safety protocols have not prevented unintended consequences from occurring. So, we cannot buy your "no chance of release" statements.

2|7.2 | The siting of your lab in Athens will destroy our night life, be a miserable monstrosity in full view of our sunroom and bedroom and destroy the peace and  
 3|10.2 | tranquility of our neighborhood with constant fan motor, generator motors and other noise generating activities that are part of operating a laboratory of this size.

4|9.2 | And, to add insult to injury, you have now decided to incinerate carcasses directly upwind of our neighborhood. So, now you are asking us to suffer an incinerator effluent (most of the time) in addition to the other injuries that this facility will inflict on us.

5|25.2 | I consider this a "government taking" of our home, health and way of life without any considerations what so ever and I object in the strongest terms possible.

6|5.2 | Please choose some other more suitable or an off shore site to build this dangerous facility. We don't want it in our neighborhood.

Sincerely,

William H. McDaniel  
 [REDACTED]

Comment No: 1                      Issue Code: 21.2

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. Chapter 3, 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 releases due to weather events. 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 Chapter 2, 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 Chapter 3, 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 Chapter 2, 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 Animal Research Policy and Institutional Animal Care and Use Committee (APHIS). 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, including institutionalized 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 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.

Comment No: 2                      Issue Code: 7.2

DHS notes the commentor's concern regarding development of the South Milledge Avenue Site which is described in Section 3.2.3. The visual effects of the NBAF at the South Milledge Avenue Site are also described in 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. Nighttime lighting could be mitigated with the use of shielded lighting and/or shielded fixtures that direct light downwards and can be used to keep light within the boundaries of the site and use of the minimum intensity of lighting that is necessary to provide adequate security. 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 effects on the surrounding community.

Comment No: 3                      Issue Code: 10.2

DHS notes the commentor's noise and visual effect concerns. The NBAF EIS Section 3.5.3 describes the potential construction and operational consequences from noise effects at the South Milledge Avenue Site. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the visual aesthetics of the area as described in Section 3.2.3.

Comment No: 4                      Issue Code: 9.2

DHS notes the commentor's concern for air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Air pollutant concentrations 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: 5                      Issue Code: 25.2

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

Comment No: 6                      Issue Code: 5.2

DHS notes the commentor's opposition to the five mainland site alternatives including the South Milledge Avenue Site Alternative.