

Prescott, Kathy

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WD0523

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Sunday, August 24, 2008 5:23 PM
To: NBAFProgramManager
Cc: Director@athensfaq.org
Subject: COMMENT: ROD/COMMUNITY ACCEPTANCE

Dear Mr. Johnson,

PLEASE ADD THIS COMMENT/QUESTION TO THOSE BEING CONSIDERED FOR THE FEIS.

FEDERAL REGISTER: JUNE 27, 2008 (VOLUME 73, NUMBER 125):

Additional studies are being performed concurrently with this EIS that will provide important decision-making information. Results of these studies will be used in the development of the Final EIS and the Record of Decision (ROD). In order to make these decisions and formulate the ROD, the following reports will be considered:

- (1) EIS,
- (2) Threat Characterization Risk Assessment,
- (3) Site Cost Analysis,
- (4) Site Characterization Study,
- (5) Plum Island Facility Closure and Transition Cost Study, and
- (6) Prior analysis of the alternative sites against DHS' site selection evaluation criteria**

The information contained in these reports will assist DHS and USDA, **a major stakeholder in this endeavor**, in considering the protection of the public and the environment while meeting the need for a modern, high-security BSL-3Ag and BSL-4 research facility with the capabilities needed to address potential threats to our agriculture.

NBAF DEIS: PAGE 2-50:

Additional studies are being performed concurrently with this EIS that will provide important decision making information. Results of these studies along with agency and public input will be used in the development of the Final EIS and the ROD.

In making these decisions and formulating the ROD, the following reports will be considered:

- (1) NBAF EIS
- (2) Threat Risk Assessment
- (3) Site Cost Analysis
- (4) Site Characterization Study, and
- (5) Plum Island Facility Closure and Transition Cost Study

The information contained in these reports will assist DHS and USDA, **a consulting agency in this endeavor**, in considering the protection of the public and the environment while meeting the need for a **domestic**, modern, high-security BSL-3Ag and BSL-4 research facility with the capabilities needed to address potential threats to our agriculture.

1|4.2

1. EXPLAIN WHY "PRIOR ANALYSIS OF THE ALTERNATIVE SITES AGAINST DHS' SITE SELECTION EVALUATION CRITERIA" WAS LEFT OUT OF THE DEIS LIST. THE

Comment No: 1 Issue Code: 4.2

DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. The decision on whether to build the NBAF 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.

The Department of Homeland Security Under Secretary for Science and Technology Jay M. Cohen, with other Department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the Final NBAF EIS is published.

Prescott, Kathy

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ONE OF THE FOUR SITE SELECTION EVALUATION CRITERIA IS **COMMUNITY ACCEPTANCE**. COMMUNITY ACCEPTANCE HAS NOT BEEN AND NEVER WILL BE ACHIEVED IN ATHENS, GA. THAT FACT MUST BE ADDRESSED IN THE FEIS.

1 cont. | 4.2

2. WHAT IS THE REASON FOR DESCRIBING THE USDA AS "A MAJOR STAKEHOLDER" IN THE FEDERAL REGISTER AND AS "A CONSULTING AGENCY" IN THE DEIS? WHY THE DISTINCTION?

3. WHAT IS INTENDED BY INSERTING THE WORD "DOMESTIC" INTO THE DEIS DESCRIPTION OF THIS FACILITY? WHY THE DISTINCTION?

COMMUNITY ACCEPTANCE MUST BE INCLUDED IN THE FEIS AND TAKEN INTO ACCOUNT FOR THE ROD. WITHOUT COMMUNITY ACCEPTANCE, THE SOUTH MILLEDGE AVENUE SITE IN ATHENS, GA CANNOT BE CONSIDERED A REASONABLE ALTERNATIVE FOR NBAF.

Respectfully submitted,

Kathy Prescott
Co-Founder, *FAQ, inc.*
For Athens Quality-of-life

Pruett, PhD, Stephen

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WD0883

From: Stephen Pruett [REDACTED]
Sent: Monday, August 25, 2008 5:03 PM
To: NBAFProgramManager
Cc: Kent Hoblet
Subject: NBAF Site Selection

To Whom It May Concern:

1|24.5 I am writing to express my support for locating NBAF in Mississippi. I am Interim Associate Dean for Research and Graduate Studies and Head of the Department of Basic Sciences at the College of Veterinary Medicine at [REDACTED]

2| 8.5 I am very concerned about reports I have seen in the press implying that Mississippi does not have sufficient trained personnel or infrastructure to support a facility like NBAF. I am sure you have a much more informed opinion, but I would like to emphasize some of the more positive aspects of locating the facility in Mississippi. As a College of Veterinary Medicine, we are obviously looking forward to interacting with scientists at NBAF. All of our major research focus areas are relevant to the NBAF mission. We have very successful groups in infectious diseases, bioinformatics (including genomics and proteomics), and toxicology. Our toxicologists successfully competed for a Center for Biomedical Research Excellence (\$7,000,000). Our bioinformatics group received over \$2,000,000 in grant funding last year, about \$1 million each from USDA and NIH. Campus-wide, our genomics, proteomics, and computing support for these methods have received over \$30,000,000 in research funding in the past 5 years, almost all of it competitive. Several of our faculty have published extensively on genomic analysis relating to bacterial pathogenicity. Our capabilities in the area of biological modeling and epidemiology are substantial. In fact, we just hosted an international meeting on chicken genomics, because our group here is one of the leading groups in the world on this topic (see, for example, the AgBase database, [REDACTED]). One of our faculty members handled reporting for the foot and mouth disease outbreak in the U.K. in 2001, so he has direct experience with one of the agents under investigation at NBAF. Research on genomics of microorganisms is another area of strength at CVM. Our scientists will be able to bring substantial experience to the assistance of NBAF scientists. We have core facilities for genomics, proteomics, imaging (luminescence, MRI, ultrasound, and CT), microscopy, quantitative analysis of biomolecules and xenobiotics, and laser capture microdissection. These and many other technical capabilities can be used in Cooperative Agreements or other mechanisms to assist NBAF scientists with work that does not require high

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: 8.5

DHS notes the information provided by the commentor.

Pruett, PhD, Stephen

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WD0883

2 cont.
8.5

level biological containment. In addition, many of our scientists would be interested in making use of NBAF facilities to work on projects related to the NBAF mission, and such an arrangement would benefit both MSU and NBAF.

We have an active graduate program in the College of Veterinary Medicine with 69 graduate students currently enrolled. Many of these students would be qualified to work at NBAF when they complete their studies. Campus-wide there are many more graduate students who will earn advanced degrees that are relevant to the mission of NBAF. We have just joined with the University of Southern Mississippi to develop a Masters of Public Health degree with an emphasis on veterinary issues, including infectious diseases, that would be relevant to the mission of NBAF. Our students will take most of their courses by distance learning via videoconference facilities that are already in place at both institutions. These facilities will also be useful for interactions between CVM faculty and NBAF scientists. Therefore, there will be a trained workforce of scientists for NBAF. This is also true at the undergraduate level. Microbiology, biochemistry, animal science, food science and technology, biological engineering, and biology are popular majors here, graduating well over 100 B.S. level graduates each year. Many of these individuals want to remain in Mississippi. Our B.S. program in microbiology in the Department of Biological Sciences has been reviewed by and is approved by the American Society for Microbiology. These graduates would be particularly qualified as technicians at NBAF. Also, MSU and the University of Mississippi Medical Center in Jackson graduate many medical technologists every year, who have considerable microbiology training and would be excellent employees for NBAF. As a scientist who works in Mississippi, I can attest that advertisements on the MSU web site for technical staff or post-doctoral trainees always get a significant number of qualified applicants. Therefore, I know there are many individuals with experience in NBAF-related tasks who are available for employment in Mississippi. This is almost certainly the case around the University of Mississippi Medical Center, where spouses of medical and graduate students, residents, and post-doctoral trainees are often trained in microbiology-related disciplines and are seeking employment while their spouse completes training (I hired one such person recently as a Post-doctoral researcher).

The Environmental Protection Agency labs in Research Triangle Park, NC have cooperative arrangements with Universities in that region to allow EPA scientists to serve as mentors for graduate students and post-doctoral trainees who work in EPA labs. Both parties benefit substantially from this. For example, scientists at EPA gain access to highly skilled and knowledgeable doctoral graduates and have an opportunity to benefit from their work and also to evaluate them as future employees, and the universities gain the benefit of being able to place their graduates quickly in a facility with unique training opportunities. With regard to graduate students, most scientists want to be involved to some degree in

Pruett, PhD, Stephen

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WD0883

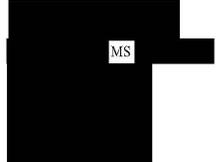
2 cont.]
8.5

graduate education and our proximity to the proposed NBAF site would facilitate such interaction. Although security concerns at NBAF may limit the some such interactions, Mississippi offers an excellent opportunity to establish many relationships of this type.

In summary, Mississippi offers a College of Veterinary Medicine with considerable expertise in infectious diseases of animals. Our faculty are anxious to develop collaborations with NBAF scientists, and we plan to offer them adjunct appointments that will allow them to participate in graduate training and other activities, which most scientists want to do. We have technical capabilities that could be used to augment those of NBAF to address issues that require additional capacity. Universities in Mississippi produce enough well trained graduates both at the B. S. and Ph.D. levels to provide an excellent workforce for NBAF.

Sincerely,

Stephen Pruett, Ph.D.
Interim Associate Dean for Research and Graduate Studies
Professor and Head
Department of Basic Sciences
College of Veterinary Medicine



Pullin, Dave

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08/13/2008 2:08 PM Dave Pullin [REDACTED] p.01

Transmitted by fax to 1-866-508-6223 FD0012

Comments on the Draft Impact Statement for the US Department of Homeland Security National Bio and Agro-Defense Facility.

1| 21.0 | These comments relate to the DEIS assessment of the consequences of the release of pathogens from the NBAF and probability thereof, and omission of environmental impact of foreseen collateral development.

I look forward to reading the response to these issues in the final Environmental Impact Statement.

Dr Dave Pullin, BA, MA, PhD (*Camab.*)
[REDACTED]

Logic Flaws in Determining the Worst-Case Scenario
The methodology of limiting the study to three pathogens in order to determine the worst-case scenario is invalid for these reasons:

1 cont. | 21.0 | 1. It presumes that the answer is known in order to determine the answer. While it is plausible that professionals have an intuitive knowledge of "hardest" pathogen to handle, they cannot know the full consequences of the escape of any pathogen in order to determine, a priori, which has the worst consequences. In particular, they cannot know the result a priori for each of the possible sites in order to differentiate the relative merits of the possible sites. For example, Hendra may have worse consequences than Nipah where there is a high population of horses, since the former is transmitted from equines to humans. To say (DEIS Page 3-371) "HV raises no concerns that are not present for the Nipah virus", ignores the fact that the equine density surrounding the possible sites is markedly different. It is possible, for example, that high equine density around the NC site, compared to Plum Island, combined with the higher risk to humans in contact with equines that Hendra represents could be the determining decision factor in site selection. Yet the issue has not been studied. The EIS is not complete unless the potential effect of each of the pathogens that may be present at the NBAF has been considered in the relation to the specific environmental situation at each possible site.

2| 19.0 | 2. The logic of the DEIS is that the worst-case consequence of the release of pathogens from the NBAF is the consequence of the single worst-case pathogen. This logic is flawed. There is no reason to be certain an escape from NBAF would be limited to a single pathogen. On the contrary, there is every reason to believe

3| 21.0 |

Comments on the Draft Impact Statement for the US Department of Homeland Security National Bio and Agro-Defense Facility by Dr. Dave Pullin Page 1 of 5

Comment No: 1 Issue Code: 21.0

The Department of Homeland Security (DHS) and the United States Department of Agriculture identified several disease agents that potentially would be studied at the NBAF. DHS and USDA determined that three of the microbes warrant specific and detailed discussion in the NBAF EIS. The microbes are foot and mouth disease virus, Rift Valley fever virus, and Nipah virus.

Fundamentally, microbes chosen for specific discussion are those that would present the most demanding challenges regarding containment, emergency response, infectious potential, transmissibility and contagion, human health impacts, animal health impacts, economic impacts, and ecologic impacts. As part of the process it was concluded that the remaining candidate microbes pose risks that in most cases do not equal, and in no cases exceed, those risks posed by the three selected microbes.

Hendra Virus (HV): HV has significant similarities to Nipah virus. Both require biosafety level 4 containment precautions. Both are zoonotic agents, meaning humans as well as animals can become infected. Both are carried by fruit-eating bats (i.e. these bats are reservoirs). Only three cases of human infection from Hendra virus have been reported to date and these appear to have been acquired from body fluids or excretions of infected horses. There are no reports of HV infections in other animals. In contrast, Nipah virus (NV) infects pigs, dogs, cats, and hundreds of infections (often fatal) have been reported in humans. Infections can be transmitted readily by aerosol under favorable conditions. Person to person transmission is possible, apparently by contact with contaminated body fluids (saliva). HV raises no concerns that are not present for NV.

Comment No: 2 Issue Code: 19.0

The NBAF EIS uses a bounding approach. Fundamentally, pathogens chosen for specific discussion are those present the most demanding challenges regarding containment emergency response, infectious potential, transmissibility and contagion, human health impacts, animal impacts, economic impacts and ecologic impacts. The 3 selected pathogens (foot and mouth disease virus, Rift Valley fever virus, and Nipah virus) pose a risk not exceeded by and in most cases not equated by the other five pathogens proposed for research within the NBAF.

Comment No: 3 Issue Code: 21.0

In evaluating the potential impacts and responses to the release of the bounding diseases, all foreseeable significant environmental impacts can be assessed either as an individual or as a cumulative impact.

Pullin, Dave

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Dave Pullin

p.02

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FD0012

3 cont | 21.0

that an intentional release (by hostile interests) would be a simultaneous release of as many pathogens as possible, particularly if a simultaneous release has not been studied and mitigated against. There is no a priori reason to believe that all consequences of the second and subsequent pathogens would be subsumed in the consequences of the first. While it is only necessary to kill an animal once, even for two pathogens, there is no a priori reason to believe that it would be the same animal that needed to be killed for all pathogens. There is a possibility that some consequences will be additive or worse. Response personnel may not be available to handle the response to the second pathogen because they are occupied performing the (different) action required by the first. In the absence of a specification of, and study of, the response plan for each pathogen it is not possible to determine if the actions interact positively or negatively. In the worst case the response actions for one pathogen may be prohibited by the actual or possible presence of a second pathogen. Perhaps hunters would be unable to depopulate deer to control FMD because of actual or perceived personal danger from one of the other pathogens simultaneously released. History shows that many real unmitigated disasters stem from the failure to plan against a combination of factors. The combination of the consequences of all pathogens present at NBAF must be studied and evaluated.

Understatement of the Consequences of the Worst-case Scenario

4 | 15.0

The DEIS presumes that the worst-case consequences are completely determined and described by a dollar figure for US losses. This omits the consequences on the (unspecified) party that takes the loss, consequences that are not reversible by financial compensation, and the consequences of the actions on the world outside the US.

1. Losses borne by "the local county" or local farmers could cause hardships or other consequences that add to the worst-case consequences. For example, it may cause a permanent decrease of the scale of the agriculture industry or the inability of the local county to maintain essential services.
2. If, as many might assume but is not stated in the DEIS, the costs are borne by the federal government, which is already massively in deficit, it is likely that the consequences of increasing that deficit would be more than simply an increase in the size of the national debt.
3. The consequences, even if fully financially compensated for, are not necessarily reversible. The genes of a bloodline wiped out by a de-population response action are gone forever, and cannot be recovered by financial compensation.
4. The consequences do not stop at the US border. Most of the consequences noted constitute a decrease in the food supply exported from the US. There is already insufficient food to feed the world's population. As with the redirection of corn from food to bio-fuel, a reduction in the food exports from the US translates into starvation somewhere in the world. A 2003 Pentagon report documented the causal connection from deprivation and starvation to political and economic de-

Comments on the Draft Impact Statement for the US Department of Homeland Security National Bio and Agro-Defense Facility by Dr. Dave Pullin Page 2 of 5

Comment No: 4

Issue Code: 15.0

DHS notes the commenter's statement regarding information to include for a worst case scenario. Potential Economic Consequences of Pathogen Releases from the Proposed NBAF are described in Appendix D of the NBAF EIS. The purpose of the Appendix is to present the potential range of outcomes that would result from a pathogen release at the NBAF. This range of outcomes is based on studies, simulations, and documented outbreaks in other countries found in the available literature. While DHS acknowledges that the types of losses noted by the commenter could occur in the event of an outbreak, quantifying these individual losses represents a level of analysis that is not within the scope of the EIS

Pullin, Dave

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08/13/2008 2:08 PM Dave Pullin [REDACTED] p.03

Transmitted by fax to 1-866-508-6223 **FD0012**

8 cont. | 15.0 | stabilization, that leads to regional wars and increased terrorism. Thus the worst-case scenario may be spiraling up in terrorism.

Understatement of the Probability of the Worst-Case Scenario

1 cont. | 21.0 | The DEIS significantly understates the probability of a pathogen escape, particularly the intentional simultaneous escape of many or all of the pathogens present. By creating the NBAF on mainland of the US with a "treasure trove" of 50+ of the worst pathogens, the DHS is creating a prime terrorist target, that could be attacked by means that completely bypass the protections presumed in the DEIS. Terrorists have as much time to plan how to defeat the protections as the DHS has to create them. Consider, for example, the consequences of terrorist sympathizers infiltrating the staff that designs, constructs or operates the NBAF. We may, unknowingly, have a bio-containment with a "back-door" or an intentional weakness that terrorists know how to exploit and plan to do so. Personnel who are rigorously trained in the procedure they must follow for safety are implicitly trained in a procedure to follow to create danger. A "sleeping" terrorist sympathizer could become a pilot for American Airlines who could crash a 767 fully fueled for the flight to London into the NBAF just seconds after takeoff from RDU 20 miles away, without the possibility of intervention by passengers or the Air Force.

5 | 21.0 |

6 | 19.0 | Such possibilities are easy to conceive – by us and our enemies – but impossible to estimate as probabilities. There is no a priori reason to believe the probability is low or consistent with the DEIS conclusion of a "Moderate" environment effect for biological, sociological or human health and safety. The justification for the participation of the DHS is based on the likelihood of terrorists using these pathogens, which suggests that if DHS is justified in doing the project at all, the likelihood that terrorists would attack the treasure trove of pathogens should be considered high. The magnitude of the 9/11 disaster was amplified by the failure of the World Trade Center architects to conceive of the form of the attack, particularly as the weapon – a fully-fueled jet airliner of a size that did not exist when the buildings were designed. The buildings' structure collapsed not because the creators did something wrong but because they did not attempt to defend against a problem they did not think of. To believe that we now know the probability of such an omission is foolish and dangerous.

7 | 2.0 |

8 | 5.0 | The two major points above, the magnitude of the consequences and the likelihood of release caused by terrorists have a multiplicative effect on the differentiation between sites, particularly between the Plum Island site and mainland sites. The higher the possible negative consequences of a release, the more likely terrorists are to try to cause that release. Therefore the Plum Island site benefits twice: the consequences of a release are smaller because of the water separation from livestock and wildlife and the cooler climate reducing the transmission by mosquito. Because the consequences are smaller, it is a less enticing target for terrorists, and favorability of the island site over any mainland site increases quadratically.

9 | 24.1 |

Comments on the Draft Impact Statement for the US Department of Homeland Security National Bio and Agro-Defense Facility by Dr. Dave Pullin Page 3 of 5

Comment No: 5 Issue Code: 21.0

DHS notes the commentor's concern that the NBAF would be a prime terrorist target. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Comment No: 6 Issue Code: 19.0

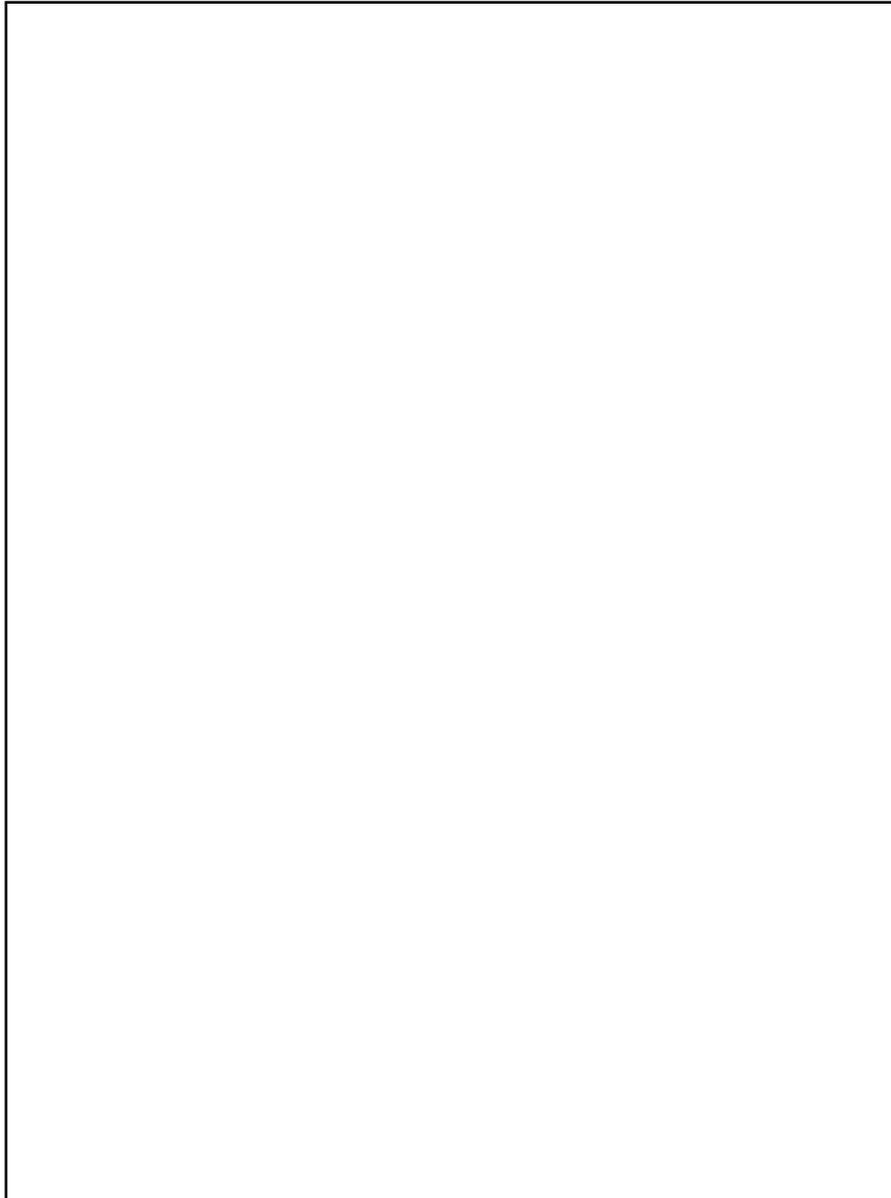
See Comment No. 9.

Comment No: 7 Issue Code: 2.0

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. DHS notes the commentor's concern that the NBAF would be a terrorist target. Section 3.14 addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Comment No: 8 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though the Plum Island Site Alternative has a lower potential impact in case of a release, the probability of a release is low at all sites. As described in Section 2.3.1, DHS's site selection process including 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 semi-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and



Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 9 Issue Code: 24.1

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

Pullin, Dave

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Dave Pullin [REDACTED]

p.04

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FD0012

Omission by pre-condition of potentially better options

Because of this quadratic benefit of island sites, the DHS should re-consider the pre-condition set on site selection that requires NBAF to be in the proximity of people (researchers and other workers), particularly if for some reason the Plum Island site is eliminated. "Proximity to research" and "proximity to workers" are site variables that should be considered and evaluated along with other variables. Including them as pre-conditions eliminates consideration of more remote islands - which gain from the quadratic benefit described above. There are plenty of examples, from offshore drilling rigs, to the prison camp at Guantanamo Bay that demonstrate the feasibility of moving the resources to the desired location rather than locating where the resources are. There are equally good examples of research collaboration across distant locations, and indeed across the world. There are costs to isolation, but they should be evaluated and compared against the cost, severity and likelihood of the potential disaster scenarios, rather than taken as a predetermine stipulation biased against the security that the DHS was created to attain.

10| 5.0

Omission of Environmental Impact of Collateral Development

The NC Consortium argues that the hosting community will benefit (economically) by collateral development, including further development required to fulfill DHS and USDA's mission, and specifically a FMD vaccine manufacturing plant. Currently any FMD vaccine required in the event of an outbreak in the US would be manufactured in the UK at the plant that is immediately adjacent to the UK's equivalent of NBAF. The cycle time for shipping the vaccine strain, once identified by NBAF, to the UK and shipping the vaccine back to the US is considered unacceptable, even assuming that the US's need is the UK's top priority.

11| 15.0

Once the NBAF has been built in the US the argument that an associated vaccine manufacturing plant should be collocated with NBAF will be made and will be undeniable. Therefore for all practical purposes the site decision for NBAF is the same as the decision to site the associated vaccine plant. Therefore the environmental impact of the vaccine plant and all other reasonably predictable collateral development must be included as part of the Environmental Impact Statement for the NBAF.

It makes no sense for the NC Consortium to justify the development and the costs to be borne by the hosting community on the basis of both the NBAF and its collateral development, but to balance it against the environmental impact of only the first part of the development.

In particular, the NC Consortium argues that the quantities of pathogens at NBAF are too small to constitute an attractive terrorist target. However the quantities of live vaccine handled by the manufacturing plant are vastly greater, and therefore make the vaccine plant a significantly more attractive terrorist target, and well as a much more likely source of pathogen escape. It is suspected that the FMD escape in the UK came from their vaccine plant and not their NBAF equivalent.

12| 21.0

Comments on the Draft Impact Statement for the US Department of Homeland Security National Bio and Agro-Defense Facility by Dr. Dave Pullin
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Comment No: 11

Issue Code: 15.0

The purpose and scope of the NBAF EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF, as described in Chapter 1, Section 1.4 of the NBAF EIS. As summarized in Section 2.2.1, the NBAF would have provision for a good manufacturing practice (cGMP) laboratory to support small-scale vaccine and reagent production. The cGMP module would support the development and eventual licensure of vaccines and anti-viral therapies discovered at NBAF and would operate in accordance with cGMPs described in U.S. Code of Federal Regulations (21 CFR Parts 210/211/600 and 610). Section 2.2.1 further notes that any large-scale production would require an industry partner. The industry partner would be selected using an open competition and would not have to be located near the NBAF.

Comment No: 12

Issue Code: 21.0

DHS notes the commenter's concern that the NBAF would be a prime terrorist target. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (TRA) (designated as For Official Use Only) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Pullin, Dave

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Dave Pullin [REDACTED]

p.05

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FD0012

8 cont. | 5.0

In effect a decision to site NBAF on mainland US is a backdoor method of introducing large quantities of FMD virus into mainland US via a collocated vaccine plant, and therefore the decision to do so should be weighed against the significantly safer alternative of locating both NBAF and the vaccine plant on Plum Island or some even more remote island.

Comment No: 8

Issue Code: 5.0

DHS Notes the commentor's support in the Plum Island Site Alternative.

Quell, PJ

Page 1 of 1

WD0246

From: Pj and Larry Davis [REDACTED]
Sent: Wednesday, August 13, 2008 2:34 PM
To: NBAFProgramManager
Subject: NBAF facility in Manhattan, KS

1|25.4; I will simply say that if it has not been proven that it would be safe to study F.M.D. on the U.S.
2|21.4 mainland, they you must NOT go forward with this facility in Manhattan, KS. The risk is too great
to take.

PJ Quell
[REDACTED]

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's views on risk. 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 with a minimal degree of risk, regardless of the site chosen.

Quint, Simon

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WD0810

From: Simon Quint [REDACTED]
Sent: Monday, August 25, 2008 5:33 PM
To: NBAFProgramManager
Subject: NBAF in Kansas

1| 5.4 | I would like to express my strong support to bring NBAF to Kansas. Not only will it have an
2| 8.4 | overwhelmingly positive impact on the state, but also (and most importantly) the current
3| 5.4 | infrastructure (both physical and mental) will lead to a facility that will provide the US with the
highest level of national security. For these reasons I believe Manhattan, KS is the most logical
site. Thank you for your time.

Best regards,
--
Simon

Comment No: 1 Issue Code: 5.4

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

Comment No: 2 Issue Code: 8.4

DHS notes the commentor's statement.

Comment No: 3 Issue Code: 5.4

DHS notes the commentor's statement.

Ragan, James and Gail

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WD0702

From: [REDACTED]
Sent: Monday, August 25, 2008 11:28 AM
To: nbafterprogrammanager@dhs.gov
Cc: [REDACTED]
Subject: opposition to NBAF lab

NBAF Program Manager:

1|25.4 As residents and home owners in [REDACTED] Kansas, we would like to express our opposition to locating the NBAF site here.

2|21.4; We received two packages from a local realtor asking us to contact you in support of the proposal. Those parties that stand to benefit financially favor the local site; but, despite lobbying by such
3|15.4 parties, many of the residents who would be affected by a Manhattan location have grave concerns. These concerns were not mitigated by the F-4 tornado that hit Manhattan and the KSU campus this summer. Farmers worry about the possible spread of any disease in an area with such a dense concentration of livestock. Others worry about the possibility that a breach in safety could adversely affect humans.

4|24.1 Personally, we view the New York site as best because of its island location, but the Texas and Mississippi communities appear more willing to accept the risk of an NBAF lab, so we would favor their selection over that of Manhattan.

James and Gail Ragan
[REDACTED]Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern regarding potential natural disaster impacts to the NBAF. Sections 3.4, 3.6, and 3.14.3.2 and Appendix E of the NBAF EIS, address NBAF design criteria and accident scenarios associated with natural phenomena events such as tornadoes, hurricanes, floods, and earthquakes. DHS notes the commentor's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 3 Issue Code: 15.4

DHS notes the commentor's concern. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. As noted in Section 3.10.9 and Appendix D, 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.

Comment No: 4 Issue Code: 24.1

DHS notes the commentor's statement.

Raines, James

Page 1 of 1

PD0106

August 19, 2008

1|25.4 I am calling to express my strong opposition to the location of the National Bio and Agro Defense facility at Manhattan, Kansas. Everyone agrees that research and counter measures on foreign animal diseases are vitally important. With the potential of a release, however, there are many reasons why the facility should not be located in the center of the United States, in the heart of the livestock industry.

2|24.1 This facility should be built, but it should be built on Plum Island, New York, which is owned by the DHS, has infrastructures already in place, and affords more protection to animals and humans due to its location.

3|21.0 The objective of this facility should be to protect people and animals, not to put them in jeopardy. It should be located somewhere where it poses the least risk to that which we are striving to protect.

My name is James J. Raines. I live in Colorado, but I went to school in Manhattan, Kansas, and I have grown up in the livestock industry. So I feel that I'm talking from experience and feel that my...what I have to say should be heard.

Thank you.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 24.1

DHS notes the commentor's statement.

Comment No: 3 Issue Code: 21.0

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.

Ramberg, Ardys

Page 1 of 1

WD0555

From: Ardys Ramberg [REDACTED]
Sent: Sunday, August 24, 2008 7:24 PM
To: NBAFProgramManager
Subject: no facility in Kansas

1) 25.4 | As a citizen of Kansas, I wish to let your organization know that I am NOT pleased that Kansas
2) 5.0 | has been chosen as a potential site. I suggest somewhere as far away as possible from any
populations. Thank you for reading this. Sincerely, Ardys Ramberg

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 5.0

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

Randall, PhD, Thomas

Page 1 of 1

WD0049

From: Tom Randall [REDACTED]
Sent: Thursday, July 10, 2008 3:32 PM
To: NBAFProgramManager
Subject: letter in support of NBAF

To whom it may concern,

1|24.3 | I am writing to support the siting of the proposed NBAF facility in Butner, NC. Committed, long term research on dangerous and potentially transmissible animal diseases is an absolute necessity. Many diseases have emerged from animals and have killed (HIV) or retain the potential to kill (SARS, H5N1 influenza) millions. Vaccines, drugs and antibiotics against pathogens do not simply appear when one needs them but require serious research over time to develop.

The recent documentation of safety violations at various academic BSL3 labs should serve to highlight the urgent need for more secure BSL4 facilities like the proposed NBAF. There are only a handful of these BSL4 facilities in this country, not nearly enough to do the research necessary or to maintain a well trained population of researchers needed to safely carry out this type of research. The urgent need for the construction of a new BSL4 facility, in contrast to upgrading a pre-existing older facility such as Plum Island, was clearly demonstrated by the accidental release of the Food and Mouth virus at Pirbright, an older facility in the UK where these animal pathogens are studied. This release was solely due to degrading infrastructure.

A major reason for building the NBAF is specifically because you cannot trust entirely on the experience of researchers. Precautions must be taken. It should be remembered that if the NBAF does replace Plum Island that experienced workers will be coming here and more will be trained for the future.

The RTP region of North Carolina is an ideal location for such a facility as the NBAF. There is a very large community of both academic biological researchers (University of North Carolina at Chapel Hill, North Carolina State University, Duke University, North Carolina Central University) from which to draw talent as well as a wide variety of companies working in the field of biotechnology.

Thomas Randall, PhD
[REDACTED]

Comment No: 1 Issue Code: 24.3

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

Randolph, Deborah

Page 1 of 1

07/04/2003 23:11 [REDACTED] DEBORAH RANDOLPH PAGE 01
FD0059

1| 25.4
2| 5.0

3| 21.4

4| 21.4

5| 15.0

I am writing to voice my objection to building the NBAF facility not only here in Manhattan, Kansas but anywhere on the mainland. I am a nurse at the local hospital and know that many times patients come to a health care facility with a mirage of symptoms. Usually these patients are admitted for further management of their symptoms, to perform tests, and are eventually diagnosed a few days later. Once they are diagnosed, if they have something contagious, we put them in isolation and try our best to implement appropriate precautions to keep any organisms from spreading throughout the unit, hospital and ultimately the community. In those first few hour-days many people come in contact with that person; doctors, nurses, respiratory therapists, occupational and physical therapists, social workers, lab personnel, dietary workers, housekeepers, not to mention the patients own family members. Each one of these people has the potential of spreading pathogens unknowingly, to others. I'd like to know what would happen if the "unthinkable" happens and one of the scientists or researchers collapses while working with one these pathogens and has to come to our facility directly from the lab. In this day and age when we know that heart attacks and strokes are time sensitive in saving heart muscle and brain, will we delay treating this person, or could their be a break in the "safeguards" the NBAF proposes they have? There is also the risk of human error to factor into the equation. This scenario puts the health care workers involved in their care at risk for spreading these dangerous pathogens to other patients (many of them are farmers), to their families, their livestock and eventually the community at large. To build this lab in the middle of the largest livestock population in the U. S. just doesn't make sense given the potential for risks.

It also seems to me to be an issue of national and economic security for our nation as a whole. Many people can barely afford the price of owning their own home, paying for a car and fueling it, health care, and medications, let alone putting food on the table. Can you imagine what would happen to the price of food if there was an inadvertent (or deliberate for that matter) release of these deadly pathogens into our food supply? Given the master minds behind the 911 attacks it wouldn't take a brain surgeon to figure out the devastation they could cause to our country as a whole by attacking our food supply. Why make it easy for them??

I hope you will consider these points along with the many others I'm sure you will receive in opposition to building this lab anywhere on the mainland- but especially here in Manhattan, Kansas.

Respectfully Submitted, Deborah Randolph

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 21.4
DHS notes the commentor's concern regarding infected worker leaving the NBAF and the potential effects to local health care responders. The types of exposure pathways for the various pathogens to be studied at the NBAF and potential consequences were evaluated in Chapter 3, Section 3.14 of the NBAF EIS. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. Appendix B of the NBAF EIS describes biocontainment lapses and laboratory-acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. 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. 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. The risk of an accidental release of a pathogen is extremely low. DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans would also include training for local law enforcement, health care, and fire and rescue personnel.

Comment No: 4 Issue Code: 21.4
DHS notes the commentor's concern regarding the potential consequences from a NBAF accident or pathogen release as the result of human error. 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.

Comment No: 5

Issue Code: 15.0

The ultimate impact on the price of food would depend on the pathogen released and the extent to which the livestock sector would be affected. One study by the USDA cited in the Appendix D, actually estimates a decrease in domestic meat prices in the case of an outbreak of FMD. The reasoning behind this conclusion is that a full blown export ban of US meats would temporarily increase the supply to the domestic market therefore lowering the price to US consumers. Any outbreak, that would lead to large scale destruction of US livestock, however, would likely result in some price increase in the short and medium term, until the livestock population could be replenished.

Ransom, Boyd

Page 1 of 1

PD0238

August 22, 2008

1| 5.0

This is Boyd Ransom. I live in [REDACTED]. I think it's utter insanity to import all of these diseases into the center of the country. I think it should be kept on an island or somewhere else other than Kansas.

2| 25.4

I don't want it in my backyard.

Thank you. Bye.

Comment No: 1

Issue Code: 5.0

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

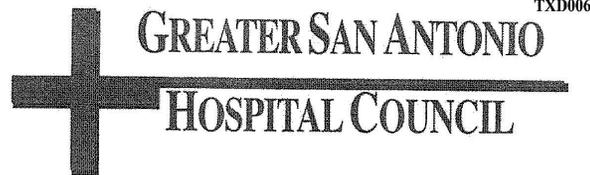
Comment No: 2

Issue Code: 25.4

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

Rasco, FACHE, William

Page 1 of 1



Hospitals and Healthcare Systems
in the
Greater San Antonio Region

The Greater San Antonio Hospital Council represents the some 53 licensed hospitals and health care systems in the 23 county region surrounding San Antonio and south central Texas. The Hospital Council provides the leadership, advocacy for and collaboration among its members in addressing the health of the communities served.

Our region's hospitals provide the largest economic impact of any industry sector with over \$4.375 Billion annually in the most recent year for San Antonio alone. The total geographic coverage is over 22,000 square miles – roughly the size of the state of Delaware. The facilities represent urban and rural hospitals from 25 to over 1,000 bed size. Near-term expansion plans include programs for 4 new acute care facilities and 2 total replacement facilities, with active discussions underway for 2 additional facilities.

1/27.0 San Antonio serves as the hub for tertiary referral services for patients requiring specialized care, having three Level I designated Trauma Centers. With the implementation of the national BRAC requirements, the two Level I military Trauma Centers will evolve into the U.S. military's largest medical training facilities anywhere in the world. Also headquartered here is the South Texas Veterans Healthcare System that provides extensive healthcare services to veterans and eligible dependents for the entire South Texas region.

The hospitals and healthcare systems represent the broad spectrum of services in the healthcare industry, including mental health, neonatal intensive care services and renowned cancer research and therapy centers – virtually all levels of medical specialties that are practiced. An integral partner is the University of Texas Health Science Center, including the medical and dental school, nursing school and allied health school. Moreover, critically significant community and private academic healthcare organizations complement and round out the strong educational environment of the San Antonio healthcare industry that work closely with the region's hospitals.

Other demographic data from the *American Hospital Association Guidebook* provides the following annual information on this region's hospitals:

Hospital Admissions	241,473
Total Payroll	\$1,116,542,000
Total Expenses	\$2,964,101,000
Hospital Births	32,567
Staffed Beds	7,381

South Texas Centre

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www.gsahc.org

Comment No: 1

Issue Code: 27.0

DHS notes the information provided by the commentator.

Ravitch, Diane

Page 1 of 1

WD0254

From: [REDACTED]
Sent: Thursday, August 14, 2008 1:39 PM
To: NBAFProgramManager
Subject: Plum Island Animal Research Center

Dear Mr. James Johnson,

1|25.1 I am writing from [REDACTED], Long Island, about 15 miles from Plum Island.

I urge you NOT to select Plum Island for the location of the DHS Biosafety Level-4 Lab.

2|5.1 Indeed, I urge you to decommission Plum Island and to turn it over to the Department of Environmental Protection for use as a research facility for alternative energy sources, open to the public for education and study.

3|14.1 In 2000, I visited Plum Island as a member of the Southold Landmarks Preservation Commission. We were interested in determining the historic value and condition of the buildings on the island. We visited every building except for the one secure laboratory. I had two strong impressions:

4|23.0 1. The island is physically beautiful and should be open to the public for public use.
 2. The buildings on the island are in a state of advanced physical deterioration, are not physically maintained, and should not be tolerated in their present condition. I saw overturned animal cages and feces littered in most buildings, as well as empty rooms littered with strewn papers.

5|21.1 Plum Island is too close to millions of people and is therefore inappropriate for a Level 4 facility. It is far too dangerous to the health of the population to expose them to possible errors and/or terrorism.

Today's newspapers report that federal sources say that a woman who was arrested as a likely terrorist (Aafia Siddiqui) "had information indicating a possible attack on the Plum Island animal-disease research site off Long Island..." (New York Post, August 14, 2008, p. 5).

1 cont. | Please do not turn this facility at Plum Island into a Level 4 laboratory. It is the wrong place. Please
 25.1; remove all DHS activities from Plum Island and allow it to be used for public purposes, open to the
 2 cont. | public.

15.1

Thank you,

Diane Ravitch
 [REDACTED] New York [REDACTED]

Looking for a car that's sporty, fun and fits in your budget? [Read reviews on AOL Autos.](#)

Comment No: 1 Issue Code: 25.1

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

Comment No: 2 Issue Code: 5.1

If the Plum Island Animal Disease Center is decommissioned, DHS would determine alternatives regarding its future and would perform a separate NEPA analysis at that time.

Comment No: 3 Issue Code: 14.1

DHS notes the commentor's statement.

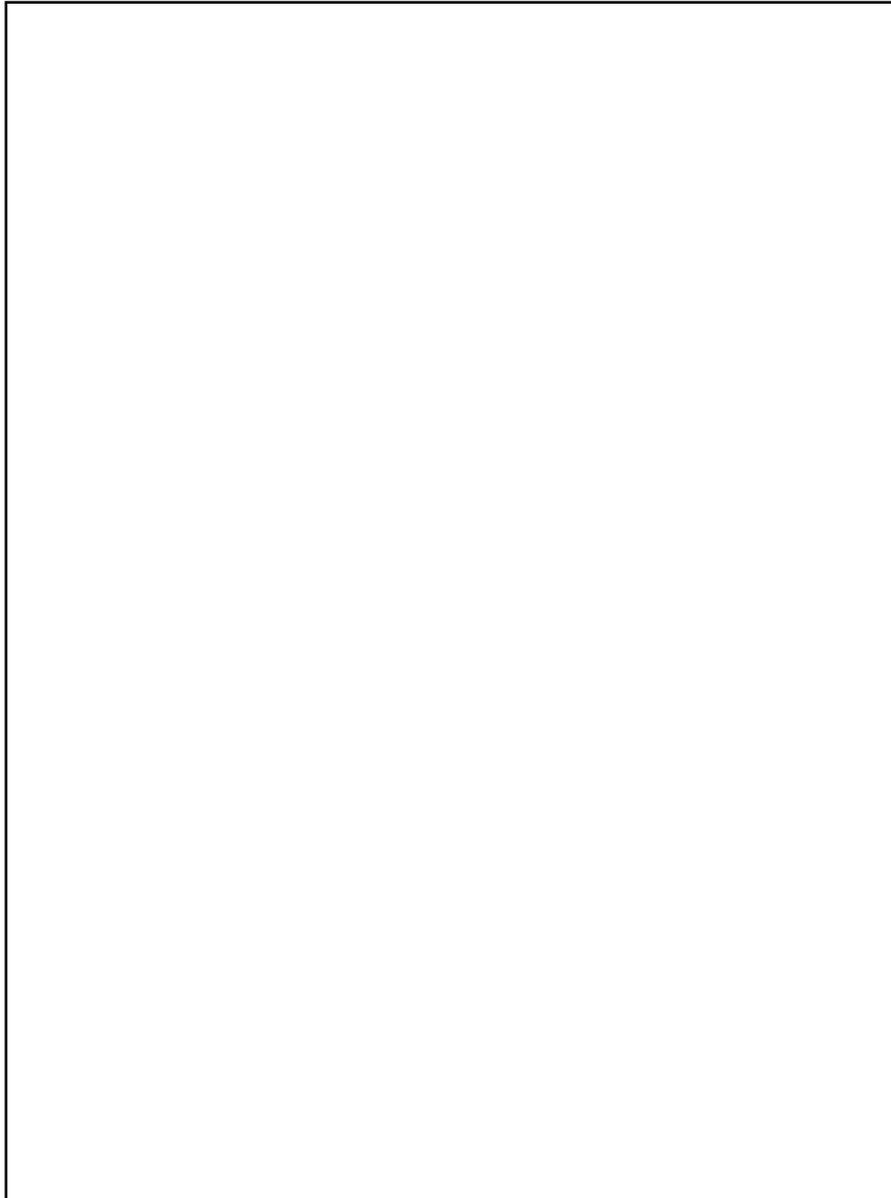
Comment No: 4 Issue Code: 23.0

DHS notes the commentor's statement.

Comment No: 5 Issue Code: 21.1

DHS notes the commentor's concern. Risks to human populations at each alternative site were evaluated and discussed in Chapter 3, Section 3.14 (Health and Safety) and Appendix E of the NBAF EIS. Modern biosafety laboratories can be safely operated in populated areas. 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.

DHS also notes the commentor's concerns regarding the risk of a potential accident or terrorist event. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. Chapter 3, Sections 3.8.9, 3.10.9, and 3.14 (Health and Safety), and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from an accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. Chapter 3, Section 3.14 and Appendix E of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The TRA is "For Official Use Only" and is not available for public review. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-biocontainment biological pathogens,



critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. Security would be provided by a series of fencing, security cameras, and protocols. In addition, a dedicated security force would be present on-site. Additional security could be provided via cooperation with local law enforcement agencies. The TRA and security actions that would be implemented, based on TRA recommendations, are confidential due to NBAF security considerations.

Rawls, James

Page 1 of 1

p.1
FD0026

James H. Rawls
[REDACTED]
[REDACTED] MS
[REDACTED]

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

RE: National Bio and Agro-Defense Facility

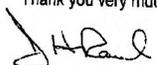
Dear Mr. Johnson,

I am a resident of [REDACTED], Ms. and own property in Pocahontas community of Madison county Mississippi. Both of these towns are in close proximity to the town of Flora that is being considered as one of the possible locations for the upcoming National Bio and Agro-Defense facility.

1| 24.5 We in Mississippi would very much like to see the facility located in our state and believe we have the sense of community, quality of life, and resources of people and educational institutions that would benefit the facility in all ways.

We do not consider the type of research to be done there to be a risk to our area, and would welcome it's location here.

Thank you very much.


James H. Rawls

[REDACTED]

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

Ready, Mary

Page 1 of 1

WD0153

From: info@athensfaq.org on behalf of Mary E. Ready [REDACTED]
Sent: Friday, August 01, 2008 11:15 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF program Manager

1|25.2: I strongly object to having NBAF in my back yard. If, according to the DEIS report, the logical place for this facility
2|5.1 is Plum Is. why not stay there and use the money (taxpayers) to rehab it. I can't help wondering who is going to
benefit financially from this endeavor. Athens needs to concentrate on existing problems ie: crime,
poverty, transportation, education, The list goes on.

Sincerely,
Mary E. Ready

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 5.1

The proposed NBAF requires BSL-4 capability to meet mission requirements (DHS and USDA). PIADC does not have BSL-4 laboratory or animal space, and the existing PIADC facilities are inadequate to support a BSL-4 laboratory. Upgrading the existing facilities to allow PIADC to meet the current mission would be more costly than building the NBAF on Plum Island, as discussed in Section 2.4.1 of the NBAF EIS.

Reavis, Michael

Page 1 of 1

8-18-08 MD0073

To Whom this concerns:

My name is Michael Reavis and I am a resident of Granville County. I think the Bio-Defense Facility in Butner is a great opportunity. It's an honor and a privelege for Butner to be selected. Working together as a team, we can accomplish cures that we have not solved yet. Ther are a lot of things we have accomplished in the past, and we are enjoying some of those in our every day life. Thanks for reading and considering my letter. Drilling for oil offshore is something we need to do and not rely on foreign oil.

Sincerely,
 Michael Reavis
 Michael Reavis

Comment No: 1

Issue Code: 24.3

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

Comment No: 2

Issue Code: 27.0

DHS notes the commentor's statement; however, it is not within the scope of the NBAF EIS, which evaluates the environmental impact of the no action alternative and the alternatives for constructing and operating the NBAF.

1| 24.3
 2| 27.0

Reese, Mary Beth

Page 1 of 1

PD0044

August 6, 2008

Hello,

1| 25.4 | My name is Mary Beth Reese. I am calling from [REDACTED], Kansas, and I'm calling to
oppose NBAF coming to Manhattan, Kansas.

2| 19.4 | I live less than a mile away from where the facility would be located, and I simply cannot
3| 13.4 | understand having all these dangerous bacteria, etc., that could spread to humans and
wildlife, set in the center of the country.

4| 21.4 | I also do not understand how you can put it in Manhattan when we are in tornado country
and there is no way to protect totally from that.

So, please do not put NBAF in Manhattan, Kansas.

Thank you.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 19.4

DHS notes the commentor's concern. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the NBAF EIS. The risk of an accidental release of a pathogen is extremely low.

Comment No: 3 Issue Code: 13.4

DHS notes the commentor's concern regarding the potential effects of an accidental release on wildlife in the vicinity of the Manhattan Campus Site. 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 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: 4 Issue Code: 21.4

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

Regnier, Bob

Page 1 of 1

WD0623

From: Bob Regnier [BRegnier@bankbv.com]
Sent: Saturday, August 23, 2008 11:49 AM
To: NBAFProgramManager
Subject: NBAF Facility at Kansas State University

1|24.4;
2|8.4

I would encourage the selection committee to seriously consider Kansas State University for the proposed new NBAF facility. K-State with its existing expertise in Food Safety and Security would be a logical choice. K-State has indicated that this general area is the principal focus of the University in the upcoming years and we would take advantage of the existing base of knowledge and expertise that exists at that location.

Bob Regnier
President
Bank of Blue Valley
PH: 913-234-2240
FX: 913-234-7040
bregnier@bankbv.com

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Comment No: 1 Issue Code: 24.4

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

Comment No: 2 Issue Code: 8.4

DHS notes the commentor's statement.

Remington, Colleen

Page 1 of 1

PD0200

August 22, 2008

1| 25.4

Hi. This is Colleen Remington in █████, Kansas. And I am not in support of getting a bio lab in the state of Kansas. I just think it's too dangerous and I wanted to express my views.

Thank you.

Comment No: 1

Issue Code: 25.4

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

Reyes, Fernando

Page 1 of 1



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MD0081

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2008 SEP -8 P 3:38

August 22, 2008

The Honorable Jay Cohen
Undersecretary for Science and Technology, and
Selection Authority, National Bio and Agro-Defense Facility
U.S. Department of Homeland Security
245 Murray Lane, SW, Building 410
Washington, DC 20528

Dear Admiral Cohen:

This letter is to offer the full support of the San Antonio Hispanic Chamber of Commerce to all of the three San Antonio sites that are pursuing the location of the National Bio and Agro-Defense Facility.

San Antonio is blessed with a brilliant scientific and academic community, a culture that embraces the city's historic contributions to national security, an eager and diverse workforce, and a "can-do" spirit. You would be hard pressed to find such a unique combination of attributes anywhere else.

More importantly, without question the National Bio and Agro-Defense Facility would find San Antonio a great ally in accomplishing the facility's mission with regard to America's security.

The San Antonio Hispanic Chamber of Commerce is proud to join hands with the Texas Biological and Agro-Defense Consortium in its efforts to house the National Bio and Agro-Defense Facility in our great city.

Sincerely,



FERNANDO REYES
2008 Chairman of the Board

Comment No: 1 Issue Code: 24.6

DHS notes the commentor's support for the Texas Research Park Site Alternative.

Reynolds, Betty

Page 1 of 1

PD0041

August 5, 2008

1|25.3 My name is Betty Reynolds and I live in Person County, and I'm calling to voice my opposition to the National Bio and Agro Defense facility that they want to locate in Butner. I feel like this is not a good place for it. It's a hazard to people and animals and the whole surrounding area in general.

Thank you.

Bye.

Comment No: 1

Issue Code: 25.3

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

Rhodes, Edna

Page 1 of 1

WD0707

From: [REDACTED]
Sent: Monday, August 25, 2008 11:50 AM
To: NBAFProgramManager
Subject: nbaf

1/25.2 | NO to NBAF in Athens!!!!!!

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

Rhodes, Edna

Page 1 of 1

WD0378

From: [REDACTED]
Sent: Tuesday, August 19, 2008 6:08 PM
To: NBAFProgramManager
Subject: NBAF

1/25.0;
2/19.0

I am voicing my opposition to NBAF. I have been chronically ill for 23 years with multiple chemical sensitivities, or another word for it is environmental illness. To have this added to our environment would be a catastrophe waiting to happen, and I for one don't need it. Sometimes money shouldn't be the issue, but saving our planet instead. Thank you. Edna Rhodes

Comment No: 1 Issue Code: 25.0
DHS notes the commentor's opposition to the NBAF.

Comment No: 2 Issue Code: 19.0
DHS notes the commentor's concern. A discussion of human health and safety is included in Section 3.14.

Rich, Allen and Fay

Page 1 of 2

3-19-08 MD0146

Home Land Security
 I am totally against NBAF Lab in Butner. My Concerns:
 Pollution in Butner on 7000 & several instructions in Butner J.U.H.,
 Central Hospital, Murdock Center, C.H.I./High School, Pope Youth
 Center, Federal Prison. There are residents in J.U.H. & Murdock
 that are bed ridden - Not enough Staff for there safety.

31
 17.3 Traffic is not enough roads for safety!! There are a lot of people
 that has work here since 1947 - are still living - on a fit income.
 2
 cont. Home will not be sold here, because, no one wants to live here.
 15.3 A lot of people cannot afford to sell their home fix income - & NO where
 to go. There are a lot of people that live in Butner has cancer?
 about the water. We have problems with our water, people
 are drinking bottle water - because of the taste.

Home Land Security - fails to discuss facility security & also
 41
 26.0 emergency response - lack of training - water & waste from NBAF &
 also traffic in this area. Fails to discuss the potential impacts
 to air, water, ground water, and safety from those systems.
 51
 21.0 Fails to include any analysis of a release of diseases such as
 Newcastle disease and Avian, flu.

4
 cont. They were ask about whether they have a job work in NBAF Lab - themselves,
 26.0 No one answer, also ask whether the information about NBAF was
 true - No answer was given. Years ago, the state had cattle on this
 land for a lot of years - it's already being contracted. Enough research
 is being done at Duke & Chapel Hill!! Concern about everyone Health!!

The place site is 1/2 miles from my home. I have been living here since
 1966. and work J.U.H. 30 years - I am very concern for all
 the resident and people that live in this area. We would like to
 live as long as possible of course everyone. Would you like to
 live by a NBAF Lab? Home Land Security - didn't answer.
 No one wants a disease - when it can be prevented by not
 61
 5.0 Put a NBAF here on any where - in the U.S.

I plan to live here the rest of my life in this area - I
 have no where to go and am retired - now since 1995 - &
 on fix income.
 Please Stay away!!!
 Allen Rich
 WE WANT TO LIVE A HAPPY LIFE!!!

1 cont.
 25.3

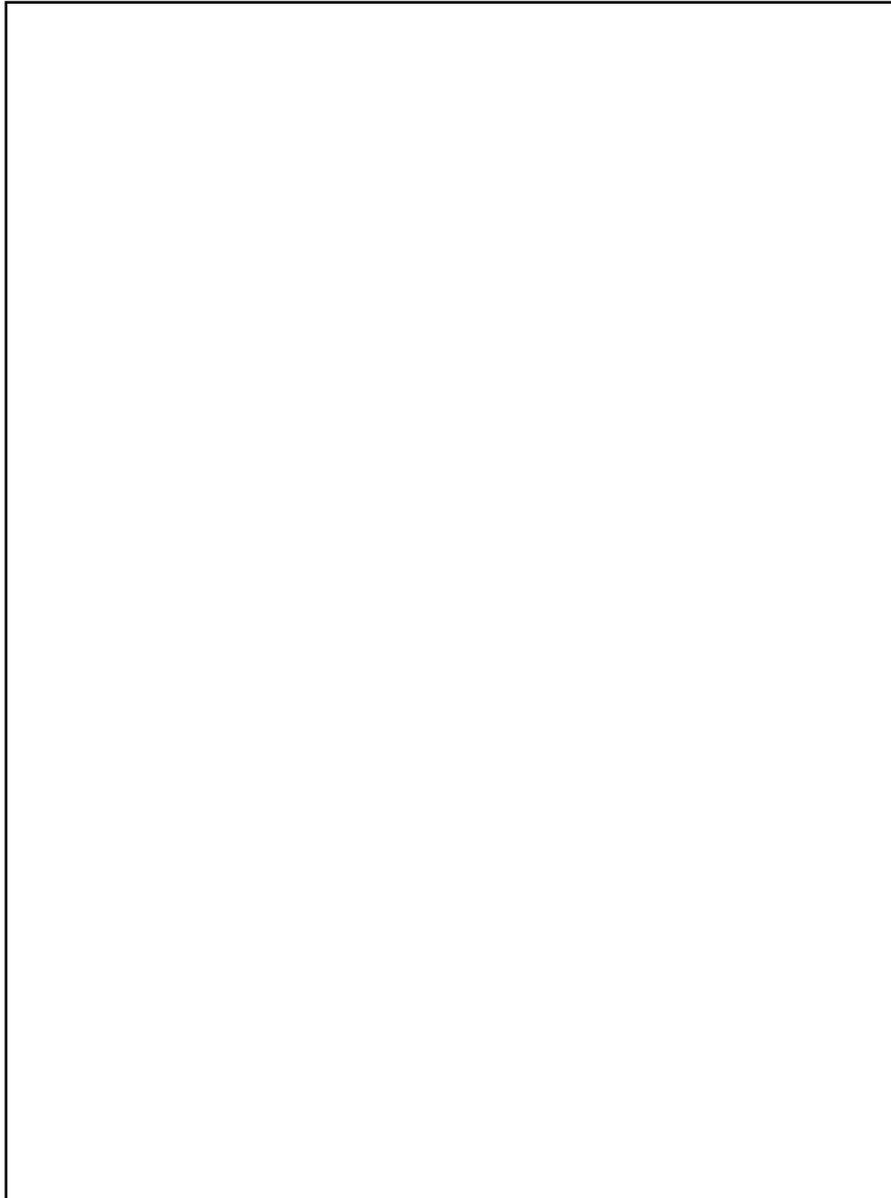
Comment No: 1 Issue Code: 25.3
 DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 15.3
 DHS notes the commentor's concern about the human health and safety of the surrounding
 institutional residents. Chapter 3, Section 3.14 investigates the chances of a variety of accidents that
 could occur with the proposed NBAF and consequences of potential accidents. 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. A site-specific emergency response plan would be developed and
 coordinated with the local emergency management plan and individual facility plans regarding
 evacuations and other emergency response measures for all potential emergency events including
 accidents at the NBAF, and which would include stipulations for all special-needs populations.

Comment No: 3 Issue Code: 17.3
 DHS notes the commentor's concern. A discussion of existing road conditions and potential effects to
 traffic and transportation at the Umstead Research Farm Site Alternative are located in Chapter 3,
 Section 3.11.7 of the NBAF EIS. A description of transportation of infectious materials is included in
 Chapter 3, Section 3.11.9 of the NBAF EIS.

Comment No: 4 Issue Code: 26.0
 DHS notes the commentor's concern for security of the NBAF. Regardless of location, the NBAF
 would have the levels of protection and control required by applicable DHS security directives. A
 Threat and Risk Assessment (designated as For Official Use Only) was prepared that evaluated site-
 specific security issues and will be considered in the decision making process on whether or not the
 NBAF is built, and, if so, where. As summarized Section 3.1 of the NBAF EIS, DHS analyzed each
 environmental resource area including air, water, groundwater, and safety in a consistent manner
 across all the alternatives to allow for a fair and objective comparison among the alternatives. 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 with a minimal degree of risk, regardless of the site chosen.

Comment No: 5 Issue Code: 21.0
 DHS notes the commentor's concern that all possible pathogens to be studied at the NBAF were not
 evaluated in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Chapter 2,
 Section 2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus,
 Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever
 virus. The accident scenarios that were evaluated in the NBAF EIS included releases of foot and
 mouth disease virus, Rift Valley fever virus, and Nipah virus. Accidents involving all other pathogens
 currently designated for study at the NBAF are effectively "bounded" by this evaluation, since these
 three pathogens represent the most difficult challenge and extreme consequences of a release.



Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluate of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required.

Comment No: 6 Issue Code: 5.0

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

Richards, Jennifer

Page 1 of 1

PD0074

August 15, 2008

Hi,

1|25.4 My name is Jennifer Richards. I'm calling from [REDACTED], Kansas, and I was calling to say that I do not support any kind of Level-4 bio lab coming to our town.

2|21.4; I think it's dangerous and human failure rates has been shown in the past that when we do
1 cont. | things like that eventually it fails. And I don't know if it would fail this year, next year,
25.4 | or 30 years from now, but I don't support any kind of lab that brings diseases that no
cures are known for, and I really severely hope that you do not bring this type of lab to
my town.

3|5.0 Again, I live in [REDACTED], Kansas. I also don't really think you need to put it in any
kind of town in the United States. If you want to research these deadly diseases, you
should be doing it on a deserted island somewhere where families are not put at risk.

Thank you.

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concerns. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. The risk of an accidental release of a pathogen is extremely low, but the economic effect would be significant for all sites. As described in Section 3.10.9 of the NBAF EIS, the economic impact of an outbreak of foot and mouth disease virus has been previously studied and could result in a loss in the range of \$2.8 billion in the Plum Island region to \$4.2 billion in the Manhattan, Kansas area over an extended period of time. The economic loss is mainly due to potential foreign bans on U.S. livestock products. Although the effects of an outbreak of Rift Valley fever virus on the national economy has not been as extensively studied, the potential economic loss due to foreign bans on livestock could be similar to that of foot and mouth disease outbreak, while the additional cost due to its effect on the human population could be as high as \$50 billion. There is little economic data regarding the accidental or deliberate Nipah virus release. However, cost would be expected to be much lower than a release of foot and mouth disease virus or Rift Valley fever virus as the Nipah virus vector is not present in the western hemisphere.

Comment No: 3 Issue Code: 5.0

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