

UNKNOWN, UNKNOWN

Page 1 of 1

PD0065

August 13, 2008

Yes,

1|24.4

I'm speaking in favor of Manhattan, Kansas as the site for the NBAF facility.

I've lived in this community for six years - taxpayer - I own...owning my home. It's a wonderful community. I'm totally in favor of the NBAF facility being here.

I'm college educated. I know all the ramifications, consequences, details, that have been spelled out at many of the public hearing sessions which I have attended about this facility, and I continue to be in favor of it.

2|8.4

Our community has such a diverse and wide base of knowledge in this area. It would make sense to have that facility here in Manhattan, Kansas. Take advantage of the intellectual people, the facilities that already exist that would wonderfully supplement and complement the endeavors of NBAF facility.

I hope that you will choose Manhattan, Kansas as the site. It makes sense. It would be the right decision to make on behalf of all of the citizens of this country and it would benefit those globally. It's the right thing to do.

Thank you.

Comment No: 1

Issue Code: 24.4

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

UNKNOWN, UNKNOWN

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PD0066

August 13, 2008

1|24.1; I'm calling from Clay Center, Kansas, and I would hope that they build the new bio  
2|5.0; defense lab on Plum Island and nowhere on the mainland. If they are going to build it on  
2|25.4 the mainland, I would hope that they would not build it at Manhattan, Kansas, as my wife  
and I live 35 miles from there, and we would not like to see it built that close to where we  
live.

Thank you.

Comment No: 1                      Issue Code: 24.1

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

Comment No: 2                      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.

UNKNOWN, yarn@allnor.com

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WD0222

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**From:** [REDACTED]  
**Sent:** Sunday, August 10, 2008 9:08 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF

1|25.2; | Please do not come to Athens. We are right up the road and do not  
2|21.2 | want the facility. You have not convinced us it is safe.

[REDACTED]  
[REDACTED] Ga  
[REDACTED]

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

Comment No: 2                      Issue Code: 21.2  
DHS notes the commentor's concern regarding the safe operation of the NBAF. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and consequences of those accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

## upper, oconee

## Page 1 of 2

WD0339

**From:** Upper Oconee Watershed Network [upperoconee@yahoo.com]  
**Sent:** Monday, August 18, 2008 10:48 PM  
**To:** NBAFProgramManager  
**Cc:** upperoconee@yahoo.com  
**Subject:** UOWN Comments on NBAF

James V. Johnson, Program Manager  
 Department of Homeland Security

18-August, 2008

Dear Mr. Johnson,

The Upper Oconee Watershed Network -- a 10 year old nonprofit organization based in Athens with 186 members dedicated to protecting the Upper Oconee Watershed -- opposes the siting of the NBAF on South Milledge Avenue in Athens, GA. This is an environmentally sensitive area that is unsuitable and inappropriate for such a large, toxic facility. Below, we list our specific comments on the EIS:

- 1|11.2 | 1.Erosion and sedimentation are not adequately addressed in the EIS. There will be substantial land disturbance during construction, and we think that more rigorous analysis such as environmental simulation modeling is needed to quantify these effects in the EIS. We ask that stream restoration be required to maintain Oconee River water quality at its current level during and after construction, that this be described in the EIS, and that the cost of restoration be included in a cost-benefit analysis of this site.
- 2|8.2; 3|12.2 | 2.The risk of increased discharge of treated waste into our rivers needs to be analyzed in the EIS to ensure that water quality standards and criteria are not exceeded in the operation of the proposed NBAF. Treated waste can reduce the oxygen in the stream to the point where fish are killed -- this occurred twice last year in Athens below the wastewater treatment plant. The EIS must address the possible lack of water for waste dilution by: 1) providing quantitative/numerical estimates (with uncertainty bounds) on the timing and amount of waste loads and estimated river flows; and 2) comparing these estimates to state standards/criteria to demonstrate compliance.
- 3 cont., 12.2 | 3.We believe that there is not enough water to support this facility. EIS p. 3-35 list two alternatives for meeting water needs-- the EIS states that one alternative will not meet peak needs, and that the other alternative is not recommended by Athens-Clarke County Government. The EIS must present a feasible alternative for meeting water needs. We ask that the EIS be revised to include a quantitative and comprehensive analysis of the proposed NBAF withdrawal within the context of the water budget and estimated future water availability in this watershed (including a consideration of climate change scenarios), and cite relevant studies on this watershed. Also, scientific literature recognizes the adverse impact of flow alteration on fish, mussels and amphibians -- the EIS must address how flow alteration due to NBAF water withdrawal and impervious surface will affect the >100 species that live downstream.
- 4|8.2; 1 cont., 11.2 3 cont., 12.2 | 4. According to the Site Characterization Report, about 550,000 gallons of fuel will be stored on site. Assuming these fuel storage tanks are located underground, they will have to be built in bedrock. Borehole data mentioned in the Site Characterization Report reveal relatively shallow groundwater levels in some areas. Therefore, there is a risk for groundwater contamination, and any such contamination will migrate to the river via fractures in the bedrock. This will be nearly impossible to clean up. This same thing is happening in adjacent areas in the State Botanical Garden of Georgia because of leaking swine lagoons, as evidenced by data collected by our organization. The EIS must quantify the risk and potential environmental impact of these fuel storage tanks.

Comment No: 1                      Issue Code: 11.2

DHS notes the commentor's erosion control concerns. The NBAF EIS Section 3.7.3.1 describes the affected water resources at the South Milledge Avenue Site alternative including surface water, stormwater, groundwater and floodplains. The potential consequences of the proposed NBAF's construction and operation on these same water resources are described in Sections 3.7.3.2 and 3.7.3.3. Section 3.6.3.1 describes the potential 292,000 cubic yards of on site material that may be displaced and/or managed.

Comment No: 2                      Issue Code: 8.2

DHS notes the commentor's concern about the water quality risk to the Middle Oconee River from increased treated wastewater discharges from the Athens-Clarke County Middle Oconee facility due to NBAF operations. An evaluation of the impact from the proposed operation of the NBAF at the South Milledge Avenue Site on the sanitary sewage infrastructure is located in Section 3.3.3 of the NBAF EIS. Based on current treatment capabilities and planned improvements, no sanitary sewage infrastructure constraints have been identified for the South Milledge Avenue Site. In addition, an evaluation of the impact from the NBAF operation on the area's general water resources, to include surface water and groundwater, is located in Section 3.7.3 of the NBAF EIS.

Comment No: 3                      Issue Code: 12.2

DHS notes the commentor's concerns and DHS acknowledges current regional drought conditions. The NBAF EIS Section 3.3.3.4 describes the proposed NBAF's potential sanitary sewage at the South Milledge Avenue Site alternative and the local limits for wastewater influents of the Middle Oconee WWTP. WWTP sewage acceptance criteria and pretreatment requirements would apply to the proposed NBAF. As described in Chapter 3 Section 3.7.3.3.1, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes. Section 3.3.3.3 describes the likely boiler fuel would be natural gas; however, if No.2 fuel oil is proposed, the fuel would be stored in above ground storage tanks meeting SPCC standards. 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.

Comment No: 4                      Issue Code: 8.2

DHS notes commentor's concern that diesel fuel will be stored in underground tanks for NBAF emergency generator operation at the South Milledge Avenue Site Alternative. The current design of the NBAF at the South Milledge Avenue Site specifies only above-ground tanks for fuel storage. No underground tanks are included in the NBAF design.

upper, oconee

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WD0339

3 cont. | While the EIS is a substantial piece of work, we feel that several places need more rigorous and quantitative analysis  
12.2 | in order for the site to be fairly evaluated. Such analysis is warranted for such an important, irreversible decision.  
We also ask that in consideration of the effects described both in the EIS and above, Table Es-3 is revised to rate  
effects on the "Water" Resource for the South Millidge Site as "Moderate." This would be consistent with page ES-  
10 where the EIS reads: "Moderate effects that would occur would be to the following resources" under which the  
first bullet is POTABLE WATER.

Thank you for considering our comments.

Sincerely, Upper Oconee Watershed Network ([www.uown.org](http://www.uown.org))

**Urbom, Kathleen**

**Page 1 of 1**

WD0757

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1|24.4 **From:** Kathleen Urbom [REDACTED]  
**Sent:** Monday, August 25, 2008 3:25 PM  
**To:** NBAFProgramManager  
**Subject:** I am in favor of locating the facility in Manhattan, KS

Kathleen R. Urbom  
[REDACTED]

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

Van Giesen, Viviane

Page 1 of 1

WD0550

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**From:** Viviane Van Giesen [REDACTED]  
**Sent:** Sunday, August 24, 2008 8:23 PM  
**To:** NBAFProgramManager  
**Subject:** Biolab In Athens Georgia

2) 25.2

I would like to express my disagreement with the possible placement of a biological terror laboratory close to my residence. We have three kids and live close to the river and to the Botanical Garden. This is a beautiful place, and it really is amazing that somebody would think of building a terror laboratory close to this neighborhood. We have the best public school system of Georgia, close to the University of Georgia, Botanical garden, all sorts of activities for children. Would you like to have your children living close to a terror bio lab? I bet you wouldn't approve of this laboratory in YOUR neighborhood.

Thank you,

Viviane Van Giesen

Comment No: 2

Issue Code: 25.2

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

Van Kuren, Peter

Page 1 of 1

WD0430

**From:** Peter VanKuren [VanKuren@ci.manhattan.ks.us]  
**Sent:** Thursday, August 21, 2008 11:27 AM  
**To:** nbaiprogrammanager@dhs.gov  
**Subject:** NBAF - Manhattan, KS - Letter of Support

Dear Mr. Johnson:

1| 24.4 I'm writing in strong support of locating the National Bio and Agro-Defense Facility (NBAF) in Manhattan, Kansas.

The benefits of choosing Kansas on the merits of animal health research and development are well known and unequivocal. As Director of the **Manhattan Regional Airport**, I would also like to highlight the benefits of convenient air transportation.

2| 17.4 The **Manhattan Regional Airport** is located less than 9 miles (15 minutes) from the proposed building site of the NBAF. The **Manhattan Regional Airport** is an FAA certificated Primary commercial service airport capable of supporting all the commercial and corporate air travel needs of staff and visitors of NBAF. We offer frequent daily service to Denver International and Kansas City International airports allowing for convenient connections to and from all major domestic and international locations.

3| 8.4 In March 2008 Governor Sebelius approved legislation providing \$2 Million in support of our ongoing effort to attract additional air service to another Large Hub airport. This effort has received broad based support from across the State. As the airline industry navigates out of its toughest economic time in history, we are well positioned to gain additional service that will enhance the already convenient service, and provide more options to the traveling public.

1 cont. |  
24.4 Once again, let me express my strong support for NBAF in Kansas, and my assurances that the Manhattan Regional Airport stands ready to support the NBAF mission. If I can answer any questions or provide additional information about our Airport's capability, please don't hesitate to call.

Sincerely,

Peter C. Van Kuren  
 Airport Director  
 Manhattan Regional Airport  
 5500 Fort Riley Blvd. Suite 120  
 Manhattan, Kansas 66502-5497  
 Office: (785) 587-4565  
 Cell: (785) 410-4668  
 Fax: (785) 587-4569  
 Website: www.FlyManhattan.com

Comment No: 1                      Issue Code: 24.4

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

Comment No: 2                      Issue Code: 17.4

DHS notes the information provided by the commentor.

Comment No: 3                      Issue Code: 8.4

DHS notes the information provided by the commentor.

**Vanderleest, Dirk**

**Page 1 of 1**

PD0321

August 25, 2008

Yes.

1| 24.5

Good afternoon. My name is Dirk B. Vanderleest. I'm with the Jackson Municipal Airport Authority. I am the Chief Executive Officer and I'm here to comment on the NBAF environmental for Flora, Madison County, Jackson, Mississippi and I just want to state for the record that JMAA, that is Jackson Municipal Airport Authority, supports this facility in the metropolitan area. It would bring a tremendous amount of opportunities, not only for the local economy, but also for the airport authority itself.

We embrace the opportunity to participate with this project.

Thank you.

Comment No: 1

Issue Code: 24.5

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

## VanSickle, Ronald and Linda

## Page 1 of 3

WD0790

**From:** Ronald Vansickle [REDACTED]  
**Sent:** Monday, August 25, 2008 4:53 PM  
**To:** NBAFProgramManager  
**Subject:** Comment on NBAF Athens, Georgia environmental impact statement

The following is an edited version of a comment I submitted earlier today. If possible, please use this message instead. Thank you for the opportunity to comment.

Re. South Milledge Avenue site in Athens, Georgia

- 1| 5.2 | We strongly object to locating the National Bio- and Agro-Defense Facility in Athens-Clarke County, Georgia on the South Milledge Avenue site. Our principal objection is locating the facility within 1-2 miles upwind of many thousands of university students living in apartment complexes and condo developments. The area of the county in which the proposed site is located has seen heavy and continuing high-density housing development in recent years. Additionally, the proposed site is within 3-5 miles of numerous long-established residential neighborhoods containing additional thousands of residents, including us, along with public schools.
- 3| 21.2 | We know that sooner or later releases of dangerous materials will occur. We live near enough to the Center for Disease Control in Decatur/Atlanta, Georgia and the Savannah River National Laboratory near Augusta, Georgia and Aiken, South Carolina to receive news reports of biological and nuclear releases. Even the most stringent protocols and security measures will fail. One of the presentations in Athens highlighted that when a release occurs
- 4| 19.2 | highly trained diagnosticians will work to identify quickly which of the disease organisms escaped. That response did not reassure us and others living near the proposed site.
- 5| 12.2 | In addition to the public safety issue that concerns us intensely, we are mystified about the claim that huge quantities of water can be guaranteed to the NBAF. Athens-Clarke County is part of an extensive area in the Southeast undergoing a severe multi-year drought. In the summer of 2007, our local and state officials informed us that we were within 45 days of completely running out of drinking water even though the new Bear Creek Reservoir was in full operation. Stringent conservation measures were put into effect, just short of government rationing of water. As a result, Athens-Clarke County was successful in avoiding failure of the water supply. Severe drought conditions have continued; we suggest you examine the U.S. Drought Monitor (<http://drought.unl.edu/dm/monitor.html>). Level 4 water conservation efforts are enabling us to manage with only moderate damage to the local economy.
- 6| 1.0 | Where is the certainty of the major water supply required by the NBAF? Similar droughts occurred in the 1980s and the 1950s, and the overall rainfall pattern in the 1990s was lower than earlier averages. Climate change to a drier regional environment is a credible interpretation of events. The rapid population growth and development of Athens-Clarke County and northeast Georgia has strained the water supply seriously. Local government officials have instituted a tiered-pricing system for water to raise the price of water to residences and businesses, but they have not yet explained to the public how the water supply will be increased substantially. A major new water user, like the NBAF, will exacerbate the insufficient water problem during droughts. That would be bad for the community and bad for the NBAF.
- 7| 5.2 | For your information, we've lived near the proposed site since 1979. We understand the need for the NBAF and approve of its construction, but we strongly object to locating the NBAF near densely populated residential areas such as the Athens proposed site. A letter previously submitted to the DHS by Larry and Mary Hepburn follows. We strongly agree with the points they make in their letter.

Sincerely,  
 Ronald and Linda VanSickle

[REDACTED] GA [REDACTED]

Comment No: 1                      Issue Code: 5.2

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

Comment No: 3                      Issue Code: 21.2

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

Comment No: 4                      Issue Code: 19.2

See response to Comment No. 3.

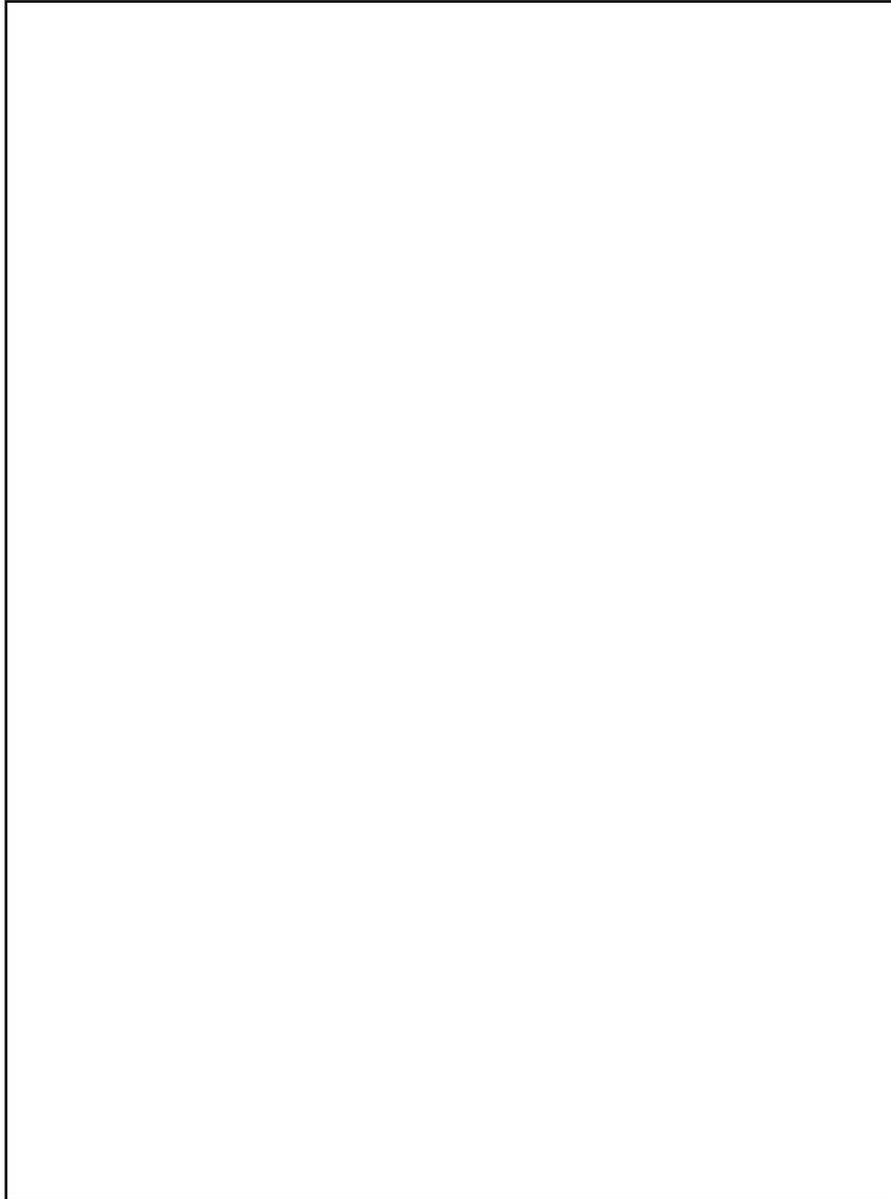
Comment No: 5                      Issue Code: 12.2

DHS notes the commenter's water use and source concerns and DHS acknowledges regional drought conditions. As described in the NBAF EIS Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF potable water usage is comparable to approximately 228 residential homes. The NBAF EIS Section 3.7.3.1.1 describes three potable water sources accessible to the South Milledge Avenue Site; the Middle Oconee River, North Oconee River, and the Jackson County Bear Creek Reservoir.

Comment No: 6                      Issue Code: 1.0

DHS notes the commenter's support for the proposed research that would be conducted within the NBAF. 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. The risk of an accidental release of a pathogen is extremely low. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and human health consequences of potential accidents.

Comment No: 7                      Issue Code: 5.2



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

## VanSickle, Ronald and Linda

## Page 2 of 3

WD0790

Date: Wed, 20 Aug 2008 22:16:45 -0400 (EDT)  
 From: Lawrence Hepburn [REDACTED]  
 Subject: NBAF Letter sent

We are retired faculty members of the University of Georgia who have lived in [REDACTED] area for 38 years. We read about the proposal to build a national "bio and agro-defense" facility here. So along with hundreds of other Athens residents we attended one of the two NBAF public hearings on August 15. This was a poor time for community input. Many residents had not returned from summer vacations, and those just returning as well as students newly arriving were not aware of the hearings on the issue of their own safety.

The hearing provided useful information. We learned about the purpose of such facilities, its structural features, and advancements in biological and agricultural defenses that a new facility is designed to provide. One cannot argue with its purposes. Clearly such a research facility is needed in the U.S. Location, however, is a prime concern – not only for the convenience of DHS and scientists who will work there but also for the safety of the public that this lab is meant to benefit.

We think a serious error has been made by The University of Georgia and Athens-Clarke County authorities in offering for NBAF a site in Athens-Clarke County on Milledge Avenue alongside the State Botanical Gardens. This site is less than three miles west of extensive residential and retail commercial development. Stretching just three to four miles east of this site are residential subdivisions – University Heights, Green Acres, Cedar Creek, Ashton Place, Crestwood, Snapfinger, Carrington Plantation to name a few – which house thousands of families. Serving these residential areas are three public elementary schools, a private elementary school, a public middle school, and a public high school. Hundreds of university student apartments, condos, and dormitory rooms are within three miles of the Milledge Avenue site.

With respect to wind patterns, the proposed site is a poor choice. It is located along a weather path where strong winds and thunder storms regularly move west to east from Oconee County and Morgan County to the eastern residential part of Clarke County. This year alone in the Cedar Creek subdivision we've had at least ten tornado watches and several tornado warnings from storms moving along a path across the potential NBAF site into residential areas. Examining records of the National Weather Bureau shows this.

Lab damage by windstorms is a serious threat to the public. We note that the draft NBAF EIS states in Appendix E that based on high velocity missile tests "the proposed NBAF conceptual design is not expected to resist the effects of wind-blown missiles." (p. 145)

Local wind patterns hold other potential risks at the Athens site. The draft EIS notes, "For all of the proposed sites, except Plum Island, NY, there was a potential for viral pathogens to be transported significant distances by the wind. The results of the modeling indicate that this transport pathway is not limited, as was the case for Plum Island. It is considered likely that deer, wild boar, and other wildlife or livestock could act to spread disease over long distances. In addition, common vectors such, as mosquitoes, can be transported long distances." (p. E-161)

With respect to insect-borne pathogens, the Athens site has an especially high risk potential from escaped infected mosquitoes. Athens-Clarke County features a relatively warm and humid climate, wetlands and woodlands, and as a consequence, a large resident mosquito population. It also has large livestock populations susceptible to mosquito-borne pathogens. The EIS notes, "With the exception of the proposed Plum Island NBA site location in NY, the other site alternatives are in population areas (high densities of people and animals) and the surrounding ecosystems that provide favorable environments to support pathogen spread and growth in the event of a release." (p. E-162)

In Athens-Clarke County, adequate water supply and sewage disposal are longstanding shortcomings. Requirements for water supply and waste disposal in a facility handling deadly pathogens and carcasses of diseased animals will place untoward demands on local public utilities of limited capacity. This site is in the heart of a drought area in which residential and commercial water usage is strictly limited by state law and local ordinance. It is also in an area where an historically inadequate county sewage system is only now beginning to undergo long-deferred rehabilitation to enable it efficiently to handle sewage loads generated by a residential population grown

VanSickle, Ronald and Linda

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WD0790

large over the last 40 years.

Human-error and infrastructure breakdown regarding this type of facility can have very serious consequences as we have seen in recent news about CDC in Atlanta and other DHS facilities. The likelihood of such errors and breakdowns are great enough to suggest that such facilities do not belong in or near residential areas.

In closing, we would like to point out that if the business and political leadership of Athens-Clarke County, and that of The University of Georgia are fixed on having a federal facility, it should look to the University's extensive land holdings nearby which would provide more suitable sites for NBAF. For example, the University holds a total of 1006 acres in Oglethorpe County, which is contiguous to Athens-Clarke and is within 30-minutes commuting distance of the main campus. Yet, it is a rural and far less densely populated area than the urbanizing area of the proposed site on Milledge Avenue.

Surely our community leadership should have expressed some of the concerns we raise about the Milledge Avenue site. We fear that state and local authorities have placed public safety low on their list of priorities. Development dollars seem to be their only interest. We are repeatedly told that many new jobs will be available in this facility, yet, the DHS spokesman at the public meeting made it clear that the federal agency would bring in its own scientists and professionals. Are local leaders as well as the public being duped?

Public protection, not economic development, is the first duty of government. The isolated offshore location of the existing Plum Island facility tells us that public safety was of paramount concern to scientists and government officers in siting that facility fifty years ago. Yet, only recently New York's two U.S. Senators oppose extending that facility or building a new one on Plum Island because of increased safety concerns associated with NBAF; it could endanger even populations who live across the water, but downwind, of the facility. Apparently, neither of Georgia's two U.S. Senators, nor other Georgia members of Congress, members of the Georgia General Assembly, or elected officers of Athens-Clarke County, have carefully considered similar potential dangers to people living in Athens-Clarke County.

Lawrence R. Hepburn and Mary A. Hepburn

[REDACTED]  
[REDACTED] GA [REDACTED]

Vaughn-Furlow, Becky

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WD0639

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**From:** BVaughn@trustmark.com  
**Sent:** Friday, August 22, 2008 8:11 PM  
**To:** NBAFProgramManager  
**Subject:** Mississippi is a great place for this facility

1|15.5;  
2|24.5

I am HR Director for a company with almost 3,000 employees. I can attest that this state has a workforce of people who have an admirable work ethic and finding people with the skill sets for unique positions is not as difficult as you may first think it may be. People in this state rise to the occasion and there are many who have been educated and looking for opportunities and want to stay in Mississippi. I think you would make a good choice to locate this facility in our state.

Becky Vaughn-Furlow  
Executive Vice President and Director of Human Resources  
Trustmark National Bank  
P. O. Box 291  
Jackson, MS 39205  
Email bvaughn@trustmark.com  
Phone 601 208-6342  
or 800 844-2000, ext. 6342  
Fax 601 208-6684  
Cell: 601 540-4308

Comment No: 1                      Issue Code: 15.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative. The employment effects of the NBAF at the Flora Industrial Park Site Alternative and the assumptions about the place of residence of NBAF employees are presented in Section 3.10.5 of the NBAF EIS.

Comment No: 2                      Issue Code: 24.5

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

Verna, Tara

Page 1 of 1

WD0104

**From:** Tara [REDACTED]  
**Sent:** Friday, July 25, 2008 11:20 AM  
**To:** NBAFProgramManager  
**Subject:** comments on NBAF Draft Environmental Impact Statement

1) 25.3 I want nothing to do with having the proposed National Bio and Agro-Defense Facility located in Butner, NC. My family lives in [REDACTED] NC, right next to Butner, and that is too close for comfort. I have multiple concerns, including:

- 2) 19.3 • Disease outbreaks and how these would be handled (multiple aerial spraying of insecticides for "an extended period of time"?--no thanks).
- The initial list of diseases to be studied includes both Rift Valley Fever and Nipah virus, both of which are transmissible to humans. I don't want to even entertain the thought of having these diseases anywhere near my children.
- 3) 2.0 • Poor management by Homeland Security
- 4) 8.3 • South Granville Water and Sewer Authority's ability to handle an additional 25 million gallons of wastewater per year
- 5) 9.3 • Additional air emissions from incinerating diseased animal carcasses, requiring state air permits
- 6) 18.3

7) 24.1 I'd suggest building a new facility on Plum Island, keeping the diseases away from the mainland and out of my backyard.

Tara Verna  
 [REDACTED] NC

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: 19.3

DHS notes the commentor's concerns regarding an accident at the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever [RVF] virus) becoming established in native mosquito populations was evaluated in Sections 3.8.9, 3.10.9, and 3.14 of the NBAF EIS. DHS would have site-specific standard operating procedures (SOP) and response plans in place prior to the initiation of research activities at the NBAF. RVF and foot and mouth disease SOPs and response plans would likely include strategies that are similar. However, the RVF response plan would also include a mosquito control action plan. The potential consequences of pesticide use would be evaluated during the preparation of a site-specific response plan. 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.

Comment No: 3                      Issue Code: 2.0

DHS notes the commentor's opinion.

Comment No: 4                      Issue Code: 8.3

DHS notes the commentor's concern. The impact from the proposed operation of the NBAF at the Umstead Research Farm Site on the local sanitary sewage system capacity and infrastructure is discussed in Section 3.3.7.3.4 of the NBAF EIS. The design and operation of the NBAF at the Umstead Research Farm Site would prevent negative impact to the Sewage Treatment Facility infrastructure and treatment capabilities. Specifically, as summarized in Section 3.15 of the NBAF EIS, pre-treatment of liquid waste streams would be implemented as necessary to meet treatment facility acceptance criteria, therefore avoiding potential impacts.

Comment No: 5                      Issue Code: 9.3

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. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Air emissions were estimated using SCREEN3, a U.S.

EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards.

Comment No: 6                      Issue Code: 18.3

DHS notes the commentor's concern. As discussed in Section 3.13.2.2 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 impact.

Comment No: 7                      Issue Code: 24.1

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

Villaronga, Lydia

Page 1 of 1

WD0057

**From:** lydiaA [REDACTED]  
**Sent:** Sunday, July 13, 2008 4:42 PM  
**To:** NBAFProgramManager  
**Subject:** NO to NBAF from local resident

1|25.2; 2|21.2 | As a resident of the Athens area, I take serious issue with the proposed NBAF. I do not believe that our nation is in the economic position to relocate such a massive facility. Economics aside, the implications for the environmental and health related consequences are enough to disgust me. There is no reason why such a facility should be located onshore. The possibility for human exposure to disease is overwhelming. At least on Plum Island, the chance of a human infection is severely limited. Should anything go wrong at the NBAF in Athens, there are thousands of lives at risk. The surrounding natural environment is already under sever stress from the drought conditions that have affected the region for the past few years. My greatest suspicions are reserved for this facility.

3|15.2 | Perhaps more disturbing than the grave public health implications for this program is the fact that the DHS has continually misled the people in portraying this facility as one that would be beneficial to the economy knowing very well that many of the positions would be filled by out of state educated professionals..not the uneducated poor from the area who need the work the most. Further, the deception extends to attempting to calm the people's fears by saying that vaccines would not be manufactured at the site,while revealing only recently that the facility would house not teaspoons of pathogens..but LITERS. i am absolutely fed up with the DHS policy of deception. Homeland security begins by protecting the interests of the homeland. This facility doesn't come anywhere close to making our homeland more secure. This site is a vulnerability and a liability.

1 cont.|25.2 | This is an outrage and should this facility be built it will be against the wishes of the entire Athens community.

Lydia Villaronga  
 [REDACTED]  
 [REDACTED] Georgia [REDACTED]

Comment No: 1                      Issue Code: 25.2

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

Comment No: 2                      Issue Code: 21.2

DHS notes the commentor's concern. 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.

Comment No: 3                      Issue Code: 15.2

DHS notes the commentor's statement regarding employment. The number of short-term and permanent jobs are discussed in Chapter3, Section 3.10 of the NBAF EIS. It is expected that approximately 2,700 direct temporary jobs would result from construction of the NBAF, 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. Permanent employees will include scientific and support staff as well as operations, maintenance and security staff. 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: 4                      Issue Code: 2.0

DHS notes the commentor's concern. Although the small-scale production facility to be used for vaccine production has a maximum capacity of 30 liters, no live virus would be used in the process.

Vinton, Daniel

Page 1 of 1

MD0117

Daniel H. Vinton  
[REDACTED]  
[REDACTED] Nebraska [REDACTED]

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

Re: NBAF Environmental Impact Statement

Dear Mr. Johnson,

1|24.1 I am a rancher in [REDACTED] Nebraska. Our economy is based on the sale of beef cattle. In an effort to minimize the risk to our industry, I encourage you to keep the NBAF at Plum Island. I feel that moving the lab to a mainland location would increase the risk of a foreign animal disease being introduced into our region.

Maintaining the lab in an area geographically isolated from large agricultural areas is the way to go. We all know that mistakes and security breeches do happen. Please support keeping the NABF at Plum Island. The United States cannot afford to compromise it's agricultural base.

Sincerely,

Daniel H. Vinton  
[REDACTED]  
[REDACTED] NE [REDACTED]  
[REDACTED]

Comment No: 1      Issue Code: 24.1  
DHS notes the commentor's opposition to the five mainland site alternatives in favor of the Plum Island Site Alternative.

**Wade, Brenda Lee Pettrey**

**Page 1 of 1**

WD0037

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**From:** brenda wade [REDACTED]  
**Sent:** Saturday, July 05, 2008 8:17 PM  
**To:** NBAFProgramManager  
**Subject:** please not athens

1|25.2 | no NBAF in the classic city, please

--  
Brenda Lee Pettrey Wade

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

Wade, Nell

Page 1 of 2

WD0701

**From:** nbwade [REDACTED]  
**Sent:** Monday, August 25, 2008 10:50 AM  
**To:** NBAFProgramManager  
**Subject:** comments to NBAF Program Manager, especially as regards the Flora, MS site

Dear NBAF Program Manager,

1|24.1 With the limited data provided to me, Plum Island appears to be the only proposed site that has a low risk of contamination from containment issues. Its colder climate & isolation make it better for risk management. Potential long term environmental & economic damage to Flora, MS., offset any short term, higher construction costs of the Plum Island site. Damage has already occurred to the Plum Island site (for example, the eradication of white-tailed deer); why put another place at risk?

2|22.5; Rift Valley Fever (RVF) introduced to our local receptive host mosquitoes would be worse than the  
 3|15.5; deadly West Nile. Wildlife interacts regularly with domestic animals in the area; to what affect if  
 4|21.5 contaminated? The EIS shows no site-specific design details for the facility, thus making it nearly impossible to determine whether it is adequate to prevent escape of potentially lethal organisms. How would mitigation occur? Eradication is not acceptable in this rural, agricultural community. The current economic impacts do not address the losses if hunting, fishing, or eco-tourism is negatively affected by wildlife contamination. The EIS fails to include any analysis of the potential consequences of a release of diseases such as Newcastle disease and avian flu, particularly given our State's significant poultry production. The EIS states that the economic impact of a release of highly transmissible Foot and Mouth Disease could be "significant" but vastly underestimates the impact.

5|23.0 What are the risk assessment calculations for the increased risk to public health and the environment as the facility ages, particularly if inadequate funds for safety systems, maintenance and upgrades are available? What would future abandonment of an outdated facility do to the community? What will it do to Plum Island?

5|23.0 The EIS doesn't list the items (such as a Central Utilities Plant, the cost of running utility services to the  
 (cont.); site, the cost of prepping the site and building the concrete pad) that the host locality and state are  
 6|17.5 expected to pay for, nor the site-specific costs for those items. The EIS does not evaluate the potential impact to or from the primary railroad transport immediately adjacent to the facility. There is mention of transportation improvements, but nothing specific, so no way to evaluate cumulative or environmental impacts. The community does not want a new limited access road to be built.

4|21.5 The EIS fails to discuss the available emergency response in the event of a release, or the lack of  
 (cont.) relevant training for local first responders (Flora currently is protected by a volunteer fire department.)  
 What costs would be borne by MS. Citizens to upgrade emergency responses?

7|12.5 Flora's EIS fails to look at the potential impacts of storm water from the site to public streams and  
 8|18.5 reservoirs, except during the construction phase for the Facility, public recreational waters or drinking water supplies. The EIS doesn't account for the increased risk due to the plan to put facility wastewater in underground tanks, with lower level containment, potentially contributing to groundwater contamination. There is no system(s) identified to be used to dispose of the waste and carcasses from the hundreds of animals to be housed at the facility, nor discussion of the potential impacts to air, water bodies, groundwater, and safety from those system(s). The EIS doesn't address the fact that the public's wastewater treatment plant has no facilities or testing to remove these dangerous disease organisms.

4|21.5 The EIS treats all accident scenarios with diseases as though their transmissibility and host  
 (cont.)

Comment No: 1 Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative since the site has already experienced the effects of an existing laboratory performing a similar function.

Comment No: 2 Issue Code: 22.5

DHS notes the commentor's question regarding mitigating an accidental release. USDA is responsible for responding to foreign animal disease outbreaks. Site specific protocols would be developed, in coordination with local emergency response agencies, that would address how an accidental release would be addressed.

Comment No: 3 Issue Code: 15.5

DHS notes the commentor's concern. The potential economic effects of an accidental release at the Umstead Research Farm Site Alternative are discussed in Section 3.10.9.5 and Appendix D of the NBAF EIS. The risks were determined to be low for all site alternatives.

Comment No: 4 Issue Code: 21.5

DHS notes the commentor's concerns regarding a release of a pathogen at the Flora Industrial Park site and the potential for wildlife (birds) to spread the released pathogen. 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. By definition and as identified in Chapter 1, Section 1.1 of the NBAF EIS, BSL-4 facilities are specifically designed to safely handle exotic pathogens that pose a high risk of life threatening disease in animals and humans through the aerosol route and for which there is no known vaccine or therapy. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections and accidental releases. A discussion of insectary operations is contained in Chapter 2, Section 2.2.1 and elsewhere in the NBAF EIS. Chapter 2, Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, also provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. In addition, information has been added to Chapter 2 regarding operations and containment of arthropod vectors. 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. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations was evaluated in Chapter 3, Section 3.8.9 and Section 3.10.9 as well as in Section 3.14 (health and Safety) of the NBAF EIS. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. The RVF response plan would also include a mosquito control action plan. In addition, oversight of NBAF operations, as

described in 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).

DHS also notes commentor's concern regarding the impact of a FMD release. The potential economic effects resulting from an accidental release of FMD is discussed in Appendix D and Chapter 3, Section 3.10.9 of the NBAF DEIS. 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. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as \$4.2 billion until the U.S. was declared foreign animal disease free.

DHS notes the commentor's concern that site specific operational, safety, security and emergency response plans are not included in the NBAF EIS. 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 analysis conducted in the NBAF EIS was based on conceptual design plans posted on the DHS website. More detailed design plans would be developed as the project moves into the final design phase. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific operational, safety, security and emergency protocols and plans would be developed that would consider the diversity and density of human, livestock and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. 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: 5                      Issue Code: 23.0

DHS notes the commentor's concerns about the sustainability of funding for NBAF to ensure safe and secure 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 for the life of the facility.

Comment No: 5                      Issue Code: 23.0

DHS notes the commentor's concern regarding the cost of the utility infrastructure to support the NBAF operation at the Flora Industrial Park site. Chapter 3, Section 3.3.5 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. Financing mechanisms for identified utility improvements or upgrades are beyond the scope of the NBAF EIS. However, while the potential costs of proposed actions are not a factor in the environmental impact analysis presented in the NBAF EIS, cost information and the scope of the cost analysis performed is summarized in Chapter 2, Section 2.5 of the NBAF EIS to provide pertinent information to the DHS Under Secretary for Science and Technology so that he may make a more informed decision with respect to the alternatives presented in the NBAF EIS.

DHS notes the commentor's concern regarding the impact of the NBAF operation on the Illinois Central Gulf Railroad track to the east of the Flora Industrial Park Site. A discussion of current land use, including the tracks east of the site, potential changes in land use, and the projected impacts to land use based on the construction and operation of the NBAF at the Flora Industrial Park Site is provided in Chapter 3, Section 3.2.5 of the NBAF EIS. No alterations of current land use designations and planning resulting from the proposed NBAF are anticipated.

DHS notes the commentor's concern regarding improvements to transportation infrastructure. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Umstead Research Farm site, to include transportation infrastructure improvements, is provided in Chapter 3, Section 3.11.5 of the NBAF EIS.

Comment No: 6                      Issue Code: 17.5

DHS notes the commentor's concern regarding the impact of the NBAF operation on the Illinois Central Gulf Railroad track to the east of the Flora Industrial Park site. A discussion of current land use, including the tracks east of the site, potential changes in land use, and the projected impacts to land use based on the construction and operation of the NBAF at the Flora Industrial Park site is provided in Section 3.2.5 of the NBAF EIS. No alterations of current land use designations and planning resulting from the proposed NBAF are anticipated. DHS also notes the commentor's concern regarding improvements to transportation infrastructure. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Flora Industrial Park site, to include transportation infrastructure improvements, is provided in Section 3.11.5 of the NBAF EIS.

Comment No: 7                      Issue Code: 12.5

DHS notes the commentor's 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. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Conservative assumptions were used to ensure the probable maximum effects were evaluated. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.13.6 describes site specific waste management processes that would be used to control and dispose of

NBAF's liquid and solid waste. Sections 3.3.5 and 3.7.5 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 8                      Issue Code: 18.5

Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As shown on the table, all of these technologies produce non-infectious residuals. As a result, there is no need for the local wastewater treatment plant to test for or remove disease organisms.

As discussed in Section 3.13.2.2 of the NBAF EIS, the final design for the NBAF will probably include more than one technology for the treatment of animal carcasses and pathological 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 the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse effect. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 of the EIS (Infrastructure) assumes that alkaline hydrolysis will be used to assess the maximum sanitary sewage impacts.

DHS has no plans to put facility wastewater in underground tanks. The liquid biowaste gathering and treatment system will be housed in a dedicated space below the floors of the BSL3E, BSL-3Ag, and BSL-4 areas. This space will be similar to a vault and it will provide another layer of containment that would prevent any accidental leakage or spills from leaving the facility.

Wade, Nell

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## WD0701

- 4|21.5  
(cont.) characteristics will not change. In fact, dozens of diseases that were originally transmissible only between animals have acquired new characteristics that allowed them to become "zoonotic" and then human-to-human transmissible, such as Ebola virus and HIV. It completely fails to include accident scenarios such as the apparent sabotage by high level biodefense researchers that lead to the Anthrax letters which killed five people in 2001.
- 4|21.5  
(cont.) The EIS fails to provide for adequate monitoring or public disclosure of organisms being studied on site or any releases identified. In other BSL-3 & BSL-4 facilities, there are recent reports of poor training, sloppy security, and very little, if any, oversight by the Government agencies who are supposed to be responsible for protecting our community. There have been a number of serious releases of dangerous pathogens and injuries to lab workers, with limited or no disclosure.
- 6|17.5  
(cont.) The shipments of deadly toxins have not been adequately secured. Flora's location will not improve that danger. The airport, not currently served by any direct international flights, is at least an hour away. Why could not some of these virulent agents that are not currently in the USA be more safely studied in their point of origin?
- 4|21.5  
(cont.) The EIS doesn't discuss the potential consequences of having a non-governmental private contractor operate the facility, which DHS states it is contemplating. How will this impact maintenance, transparency, and public accountability? The current shipment methods have been halted by the military due to just such concerns.
- 8|1.0 There is a legitimate question that should have predated this expensive analysis for a new site. Why do we need another one? What overall planning justifies the massive increase in the construction of these labs since 2001? Many of the labs are probably unnecessary or redundant, and their proliferation has only exacerbated the potential risk of a terrorist incident or accidental release - not enhanced our Nation's security. It appears that the proliferation of BSL-3 and BSL-4 laboratories across the United States since 2002 is greater than what our country needs and what its safety and security net can absorb. No new construction contracts should be issued, and no new labs should open until a comprehensive need assessment is performed by the Government Accountability Office.

Sincerely,

Nell Wade

 MS

Comment No: 8 Issue Code: 1.0

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.

Walker, Eleanor

Page 1 of 1

WD0773

**From:** eleanor w [REDACTED]  
**Sent:** Monday, August 25, 2008 4:05 PM  
**To:** NBAFProgramManager  
**Subject:** No for Athens, Ga.

- I am a 35 year resident of the [REDACTED] area and have spent my time raising 2 children, working as a retail pharmacist, growing food, and enjoying the outdoors in this area. I love the Botanical Gardens on Milledge Avenue especially the peaceful and quiet feel there. This would change with the construction of such a large facility as the NBAF.
- 1) 6.2
- 2) 5.1 It seems that a facility so large and filled with potentially dangerous pathogens should be in an isolated area, with 1000's of acres surrounding it or on an island such as Plum Island.
- 3) 15.1 I understand that it will bring people with high-paying jobs to our county, but I feel that the overall benefit to the greater population is much less than the risk and problems it will bring. Many of the employees will live in Oconee County while Clark Co/Athens will supply the infrastructure. WE HAVE A MAJOR PROBLEM WITH OUR WATER SUPPLY AT THIS TIME mainly that there is NOT ENOUGH. Businesses and residents are all cutting back, so why would we choose to add a facility with high water needs?
- 4) 8.2
- 5) 12.2 PLEASE consider these feelings that are shared by many who live here, DO NOT BRING THIS TO OUR COMMUNITY!!!!
- 6) 25.2

Thank you,  
 Eleanor Walker  
 [REDACTED]  
 [REDACTED] Ga. [REDACTED]

Comment No: 1      Issue Code: 6.2

DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 of the NBAF EIS, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. However, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden as indicated in Sections 3.8.3.2 and 3.8.3.3. Only minimal indirect effects would occur from operations due to increases in light and noise.

Comment No: 2      Issue Code: 5.1

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

Comment No: 3      Issue Code: 15.1

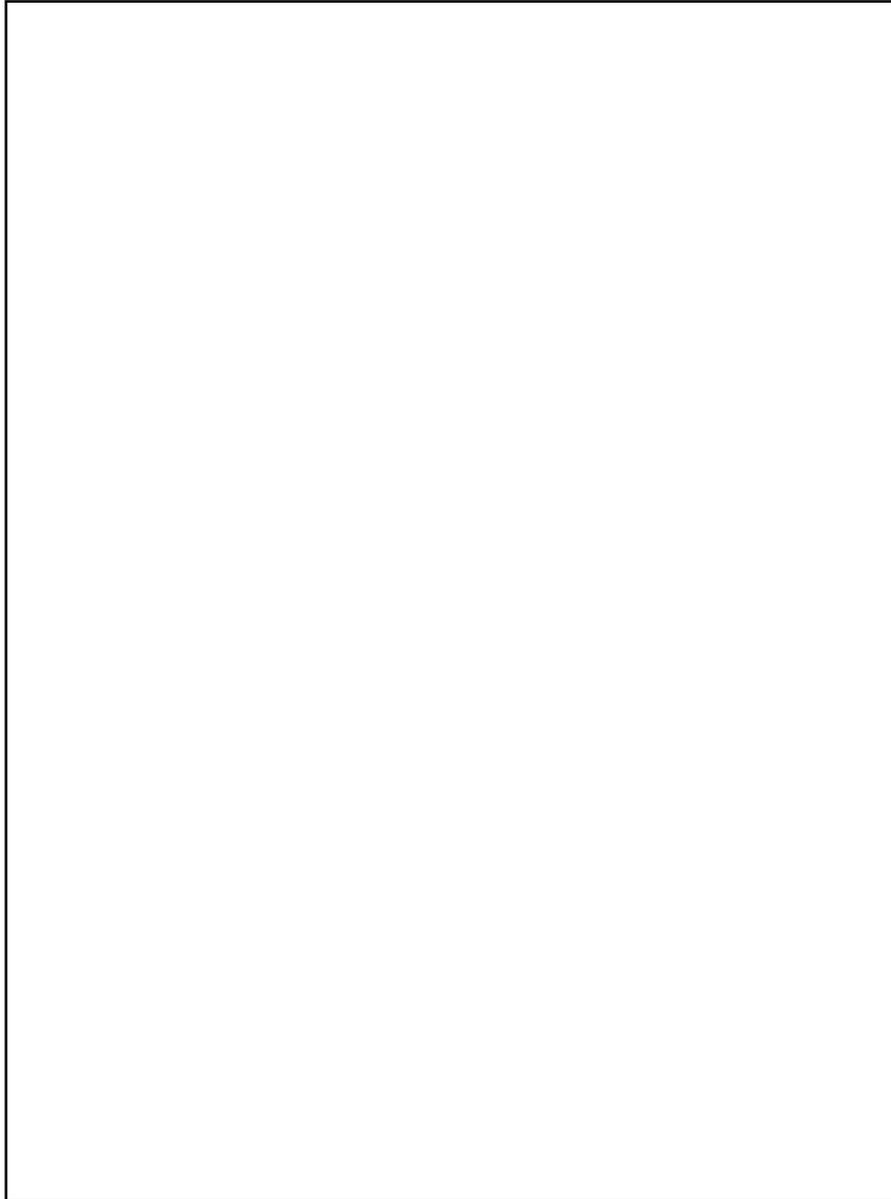
DHS notes the commentor's concern. The potential biological and economic effects of a pathogen release from the NBAF are included in Appendix D and Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the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

Comment No: 4      Issue Code: 8.2

DHS notes the commentor's concern regarding the impact of the NBAF operation at the South Milledge Avenue Site on the area's potable water infrastructure and general water resources. An evaluation of the impact from the proposed operation of the NBAF at the South Milledge Avenue Site Alternative on the potable water supply and infrastructure is located in Section 3.3.3 of the NBAF EIS. Based on planned improvements to comply with NBAF design criteria, no potable water infrastructure constraints have been identified for the South Milledge Avenue Site. In addition, an evaluation of the impact from the NBAF operation on the area's general water resources, to include surface water and groundwater, is located in Section 3.7.3 of the NBAF EIS.

Comment No: 5      Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges the drought conditions. As described in Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF potable water usage is comparable to 228 residential home's annual potable water



usage.

Comment No: 6

Issue Code: 25.2

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

## Walker, Garland and Jean

## Page 1 of 1

WD0342

**From:** Jean Walker [REDACTED]  
**Sent:** Tuesday, August 19, 2008 8:02 AM  
**To:** NBAFProgramManager  
**Subject:** NO to NBAF

There are many many problems with the Draft Environmental Impact Statement.

1|19.3; 2|15.3 | My husband and I worked and retired with the state with 30 years service. One of the most critical findings in the DEIS is that there is no evacuation plan set forth for all residents living institutional lives in places such as John Umstead Hospital and Murdoch Center. Having worked with these people and having participated in trying to evacuate for fire drills, I remember how impossible it was to carry this out. Even if there was one on one, it would be impossible to evacuate all these people. They fight and they hide from you. These people are special and should not be put in a position that is not guaranteed safe for them.

3|21.3 | Another concern is the included risk for our older population in the 50-60 mile radius of this facility. Butner and the surrounding areas are more or less a retirement community with a lot of older clientele who have given their lives caring for these people in the institutions.  
 Safety of our students is another concern. They are put at enough risk just being in public schools. The DEIS doesn't include an assessment of the impact on health and safety.

4|18.3 | The DEIS fails to identify how disposal of the waste and carcasses of large animals to be housed at the facility will be handled.

5|23.0; 1 cont. | It also fails to discuss facility security and available emergency response in the event of a release, or the lack of relevant training for local first responders.  
 19.3 | Doesn't discuss the potential consequences of having a nongovernmental private contractor operate the facility.

4 cont. | Doesn't discuss the fact that our wastewater treatment plant has a poor record of holding industries accountable for toxic pollution piped to the plant and it has not facilities or testing to remove these dangerous disease organisms.  
 18.3

These are just a very few problems with the DEIS. There are many concerns.

6|25.3 | We would like to go on record as strongly opposing this lab coming to the Granville County.

Respectfully submitted,

Garland and Jean Walker  
 [REDACTED] Residents

Comment No: 1                      Issue Code: 19.3

DHS notes the commentor's concern about the human health and safety of the surrounding special-needs 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: 2                      Issue Code: 15.3

DHS notes the commentor's concern. DHS is aware of the presence of the health and correctional facilities, described in Section 3.10.7.1 of the NBAF EIS. DHS has held public meetings and conducted outreach efforts to ensure that the surrounding communities, including officials of the health and correctional facilities, are well aware of the proposed action.

Comment No: 3                      Issue Code: 21.3

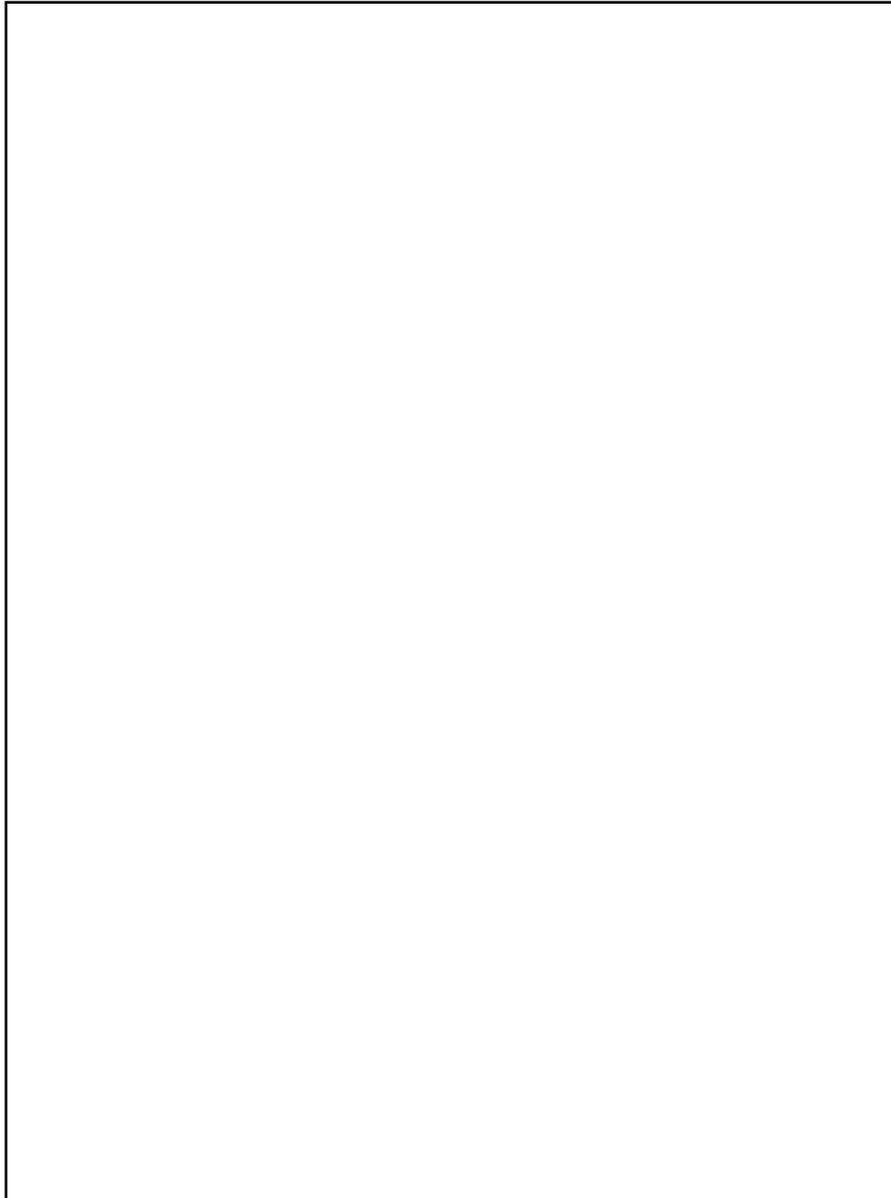
See response to Comment No. 1.

Comment No: 4                      Issue Code: 18.3

DHS notes the commentor's concern. Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). 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. As discussed in Section 3.13.8.3, sanitary wastewater from the NBAF would have to meet South Granville Water and Sewer Authority (SGWASA) acceptance criteria. These criteria do not allow infectious wastes to be discharged to the SGWASA. The NBAF would be operated to meet all applicable discharge requirements imposed by SGWASA; however, consideration of SGWASA's historical compliance record is not within the scope of the NBAF EIS.

Comment No: 5                      Issue Code: 23.0

See response to Comment No. 3. In addition, 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. 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.

Comment No: 6                      Issue Code: 25.3

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

Walker, Nell

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PD0369

August 25, 2008

1| 25.4 | No National NBAF in Kansas. My name is Nell Walker and I'm from Nebraska.

Comment No: 1

Issue Code: 25.4

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

Walker, Sally

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WD0674

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**From:** Sally Walker [REDACTED]  
**Sent:** Monday, August 25, 2008 8:50 AM  
**To:** NBAFProgramManager  
**Subject:** DEIScommentsNBAF  
**Attachments:** EIScomments.pdf

25 August 2008

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

Dear Mr. Johnson:

Please find attached my comments on the DEIS NBAF facility proposed for Athens-Clarke County. I thank you for the opportunity to comment on this, and I also enjoyed meeting you all when you were in Athens.

After reviewing the mild to moderate risks of such a facility, and finding some major risks were not modeled, I am very concerned about locating this facility in Athens near our precious watershed area of the Middle Oconee River. I hope that I've outlined my concerns in reviewing the DHS DEIS for the proposed NBAF facility attached as (EIScomments.pdf). I realize this is a draft EIS, but I used EIS and DEIS throughout my comments. Hope that's not confusing!

If you are unable to open my pdf document, please let me know!

Thank you very much for this opportunity to express my concerns. Information on this facility has been "tamped" down in Athens, so it has taken quite a bit of reading your document, listening to you all carefully at the Public gathering, and other documents to determine the impacts of such a facility in our town.

Sincerely,

Sally E. Walker, [REDACTED] GA [REDACTED]

Walker, Sally

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WD0674

24 August 2008

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

Dear Mr. Johnson:

Thank you very much for the opportunity under the aegis of NEPA to comment on your proposed NBAF facility as outlined in your *"Draft Environmental Impact Statement June 2008 for the US Department of Homeland Security National Bio and Agro-Defense Facility"*. I enjoyed meeting many of you at the Public forum here in Athens. Thank you for listening to us, and I hope you will continue to do so in regard to the proposed NBAF lab in Athens, Georgia.

1/25.2 As a concerned scientist and professor of students at the University of Georgia, I am against such a facility being built in the Athens-Clarke County community, and I hope my evaluation of your DEIS will support my statement! My comments pertain to the proposed location of the facility adjacent to the Middle Oconee River, University of Georgia property, in Athens-Clarke County, Georgia.

I realize that my job may be in danger if I speak against such a facility; Dr. David Lee holds a considerable amount of power at the University, including allowing or disallowing applying for grants, allocation of grant money and lab space, and other research endeavors that are our livelihood as professors. Dr. Arnett Mace, as well, can also affect how much I teach, whether I can still have graduate students, etc. However, as I am an American citizen who, as a daughter of a Marine and a granddaughter of a Marine who fought in WWI and WWII, I hope, I am still protected by the right of free speech which they so valiantly fought for.

As way of background on me, I worked for a short time as an environmental consultant for Tetra Tech and for five years as a benthic laboratory manager or benthic invertebrate biologist for an Environmental Consulting firm that prepared EIS statements concerning marine systems off the coast of California. I am now a professor of Geology who is also co-staffed in Marine Sciences at the University of Georgia, Athens, Georgia.

2/5.0 I want to thank you again for allowing us to comment on this report, and I hope that my comments help improve your DEIS document. I also hope to show you that the Athens citing is not a good choice for your proposed BSL3/BSL4/ASBL-4 facility and that a smarter alternative is either not build the facility and continue to use Canada/Australia's facilities; or, locate the proposed NBAF site on an island or in a location as remote as possible for containment reasons. But, Athens is not an appropriate choice as I hope to demonstrate to you. I hope I did not make too many errors or have misrepresented you, as I could not read every detail of this report given the time I had.

Comment No: 1 Issue Code: 25.2

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

DHS notes the commentor's statement.

Comment No: 2 Issue Code: 5.0

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

Walker, Sally

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WD0674

Thank you very much for your kind attention to my critique: not a thousand pages, but close!

Sincerely,

Sally E. Walker

GA

NBAF site characterization document (25 July 2008) part of DEIS NBAF:

3|4.2

1. We have had less than one month to examine the NBAF site characterization study that was released to the public on 25 July 2008. This is one of the most important parts of the DEIS, why was it released so late?

4|26.0

2. Section 2, p. 4 has blacked out sections: why? What is missing?

3. Site for Athens (2A.1.1.): *"The site location is on South Milledge Avenue. The 66 acre partially wooded site is the current location of a horse pasture. An intermittent stream runs through the property in a western direction in the middle of the western edge of the site." "A wetlands/waters of the United States (WoUS) review found that the site contains no wetland areas however some stream channels were observed on the western portion of the property. Subsurface water observed in three borings between 26 to 37.5 feet. Note. Survey was performed during extreme draught conditions late 2007. Further consideration of groundwater fluctuations is warranted."*

5|12.2

*My comments:* What is missing here is that the site lies within a thousand feet of the Middle Oconee River where Athens gets its drinking water. Part of the site is in wetlands/watershed adjacent to the Middle Oconee River, as evidence by the intermittent stream that runs through the property. I am not sure the site contains "no wetlands". The highly wooded area provides protection and entrapment of water for this River, and the planned NBAF would cut down 30 acres of these trees (as detailed in the DEIS document) altering the perspective amount of water that could naturally filter into the river. No EPA or other mitigation plans are called for, and they should be, as this Middle Oconee River eventually feeds into the Oconee that feeds into the endangered Altamaha River.

The DEIS has not adequately developed point source or non-point source assessments of such a proposed facility in this watershed area. Groundwater is also very near the surface in this area, even during an extreme drought year, suggesting that any underground facilities, fuel storage, or wastewater storage/treatment facilities could potentially contaminate this subsurface water. No modeling attempt was made for a putative "non-drought year" nor these potential problems. Blasting will be necessary to uncover enough bedrock to build the facility, and the extensive blasting, with potential bedrock fracture and subsequent alteration in groundwater flow also has not been modeled in the DEIS report.

The next page of the document (2A.2) contradicts the non-wetlands statement: *"There is a potential for piping of a stream which would impact approximately 160 linear feet of bed and bank wetlands. Up to 300 linear feet is allowed under USACE nationwide permits; however, notification to the Corps and mitigation for the impacts would be required."*

Comment No: 3 Issue Code: 4.2

DHS notes the commentor's statement.

All materials used in analysis and preparation of the NBAF EIS will be included in the Administrative Record. In addition, DHS made available on its website ([www.dhs.gov/nbaf](http://www.dhs.gov/nbaf)), on or about August 11, 2008, the key supporting documents which are expected to assist the DHS decision maker in making a final decision about NBAF. These documents include the Site Cost Analysis, Site Characterization Study, and Plum Island Facility Closure and Transition Cost Study, and other documents. It is DHS' opinion that adequate time was provided to review the supporting documents.

Comment No: 4 Issue Code: 26.0

DHS notes the commentor's question. Information regarding local contributions were redacted from the document.

DHS notes the commentor's statement. 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. Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 23 public meetings have been held in the vicinity of NBAF site alternatives and in Washington D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered DHS has also provided fact sheets, reports, exhibits, and a Web page (<http://www.dhs.gov/nbaf>). Additionally, various means of communication (mail, toll-free telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance. Consultation with the NRCS regarding Prime and Unique Farmlands at the South Milledge Avenue Site is complete and is located in Appendix G.

Comment No: 5 Issue Code: 12.2

DHS notes the commentor's concerns regarding possible impact to the area's water resources. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to hazardous materials handling, spill prevention, and hazardous waste management. 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 sewage acceptance criteria that the NBAF would have to meet. DHS acknowledges the regional drought conditions. DHS notes the commentor's drought concerns and

DHS acknowledges the drought conditions. As described in Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF potable water usage is comparable to 228 residential home's annual potable water usage. Section 3.7.3.1.1 describes the potential potable water sources, the Middle and North Oconee Rivers and the Jackson County Bear Creek Reservoir.

DHS notes the commenter's concern regarding potential effects on aquatic species and water quality at the South Milledge Avenue Site. Table 3.8.3.1.3-1 in the NBAF EIS provides a list of fish species that have been collected from the Middle Oconee River. As described in Section 3.8.3.2.2, impacts to a headwater stream would impact aquatic resources within a 50-foot reach. However, a properly designed road crossing would have little or no adverse effect on downstream aquatic resources. The impacted stream, which extends into the fenced pasture, has been severely impacted by loss of buffering vegetation and erosion and sedimentation. If the final design plan does not avoid stream impacts, DHS would consider restoration of the unaffected stream segments as mitigation for the impacts. As described in Section 3.8.3.2.3, best management practices and requirements for a stormwater pollution prevention plan would mitigate potential erosion and sedimentation impacts during the construction process. The NBAF EIS acknowledges the potential for minor adverse impacts on aquatic communities due to direct stream impacts, stormwater runoff, pollutant transport, and erosion and sedimentation. However, as described in Section 3.8.3.3.1, best management practices and low impact design (LID) features would be used to minimize the potential for such impacts. Preliminary LID measures that are being considered include pervious pavement in both parking lots and pedestrian walkways, capturing and using roof runoff for landscape watering, and grading parking lots to filter storm water through landscaped areas. As described in Section 3.3.3.1.4, sewage acceptance criteria and pretreatment requirements would apply to the wastewater discharged from the proposed NBAF. The Athens-Clarke County Sewer Use Ordinance of 2007 provides limits on specific pollutant discharges to the Middle Oconee Wastewater Treatment Facility. The NBAF would be designed and operated as necessary to comply with Athens-Clarke County Middle Oconee Wastewater Treatment Facility criteria and avoid the discharge of potentially harmful wastewater constituents. Implementation of approved erosion control measures, utilization of LID storm water pollution prevention measures, and compliance with wastewater treatment standards would prevent significant impacts on downstream aquatic communities; including macroinvertebrates, amphibians and fish.

Walker, Sally

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## WD0674

Obviously, a large part of the site is a wetland adjacent to the Middle Oconee River, and this is not adequately addressed.

5Cont.12.2

Additionally, the extensive driveways and parking lots, without any mitigation facilities such as rain gardens and the ilk, can further damage the fragile Middle Oconee River that has over 90 species of macroinvertebrates, the base of the food chain for birds, mammals, and many other vertebrates in the area. This "parkinglot" effect has not been modeled as its impacts on the nearby watershed. Therefore, the public does not know the full extent of the environmental damage to our watershed of this proposed facility.

**1. Executive Summary 1.0:** *"The United States needs to update and expand its facilities to study the range of foreign animal diseases that are potential threats to United States (U.S.) agriculture." "Today, expansion is taking place within the federal sector as well. There are seven new federal facilities recently built, currently under construction, or planned, which have one or more BSL-4 laboratories. There are also BSL-4 laboratories at universities and in the private sector. While the number of BSL facilities is difficult to quantify, many more BSL-3 laboratories exist compared with BSL-4 labs (GAO 2007)."*

6|21.2

**My comments:** There are now over 1500 labs studying new and old animal diseases, including zoonotic diseases in the United States (GAO 2007). Our taxpayer money has funded approximately 50 billion dollars of such labs in the United States (Bush administration budget: Operation BioShield; but started during the Clinton administration). While the EIS does cite the GAO 2007 report, they fail to mention the reason for such a report: the GAO revealed a deep security threat in that not one federal agency knows how many, where, and what these high containment facilities are doing; oversight of such labs is missing. That's the problem: if an intentional leak, as in the Anthrax problem, occurs or an accidental leak, wouldn't it be difficult to pinpoint the problem? Rectify the situation? The public is not informed of these types of risks. This EIS does not justify why we need yet another lab to do the same thing that these other labs are doing, but with an added, more dangerous facility never before built on the mainland U.S. (a BSL4/BSL3/ABSL-4 lab) with no conflict-of-interest free oversight agency of such a facility. UGA, Merial, are not conflict-of-interest free entities, nor is the Georgia Alliance or the Medical College of Georgia. As taxpayers, we need a conflict-of-interest free entity to protect us.

This EIS statement does add that the most dangerous diseases known to humans and other animals (e.g. Hendra, Nipah) will be studied in a new BSL3Ag-BSL-4 combined facility that no US labs now have, to be relocated in a highly urbanized, congested area of the United States next to farms with economically-important livestock, located within a few thousand feet of the Oconee Watershed area that flows into the seventh most endangered river in the United States, and close to a University with over 32,000 students that live or commute and drink the water from the Oconee River watershed area. Even if a small leak occurs, the economic impacts of such an event have not been adequately modeled. This is a major oversight of the EIS statement for the proposed NBAF facility, and also a major oversight by our state and local Government.

**2. Executive Summary 1.0:** *"The Plum Island Animal Disease Center (PIADC), where much of the current research on foreign animal diseases is performed, is an essential component of the national strategy for protecting U.S. agriculture from a bioterrorist attack involving the intentional introduction of viruses such as foot and mouth disease. However, PIADC was built in the 1950s and is nearing the end of its lifecycle. The NBAF would fulfill the need for a secure U.S. facility that could support collaborative efforts among researchers from federal and state agencies and academia."*

7|27.0

**My comment:** Almost every University that can afford it are studying animal diseases in the U.S., many funded since 2001 by Operation BioShield. Have we gained anything from this? No answers are provided in the EIS statement. The only bioterrorism event that occurred in the US was the Anthrax Event, killing five people, cultures of which came from the the U.S. Government's military biodefense base at Ft. Detrick. Currently, there are over 100 labs with Anthrax in them, is that safe? I don't know. I expect that millions, if not billions of tax-

Comment No: 6

Issue Code: 21.2

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

DHS notes the commentor's question regarding oversight of NBAF operations. Procedures and plans to operate the NBAF will include the Institutional Biosafety Committee, which will include community representatives as described in Section 2.2.2.6 of the NBAF EIS. Should a decision be made to build NBAF and the site selected, DHS would begin transition and operational planning which would include consideration of policies and procedures for public participation, education, and also public advisory initiatives. After DHS determines the viability and nature of such a public advisory and oversight function, appropriate roles and responsibilities would be defined.

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

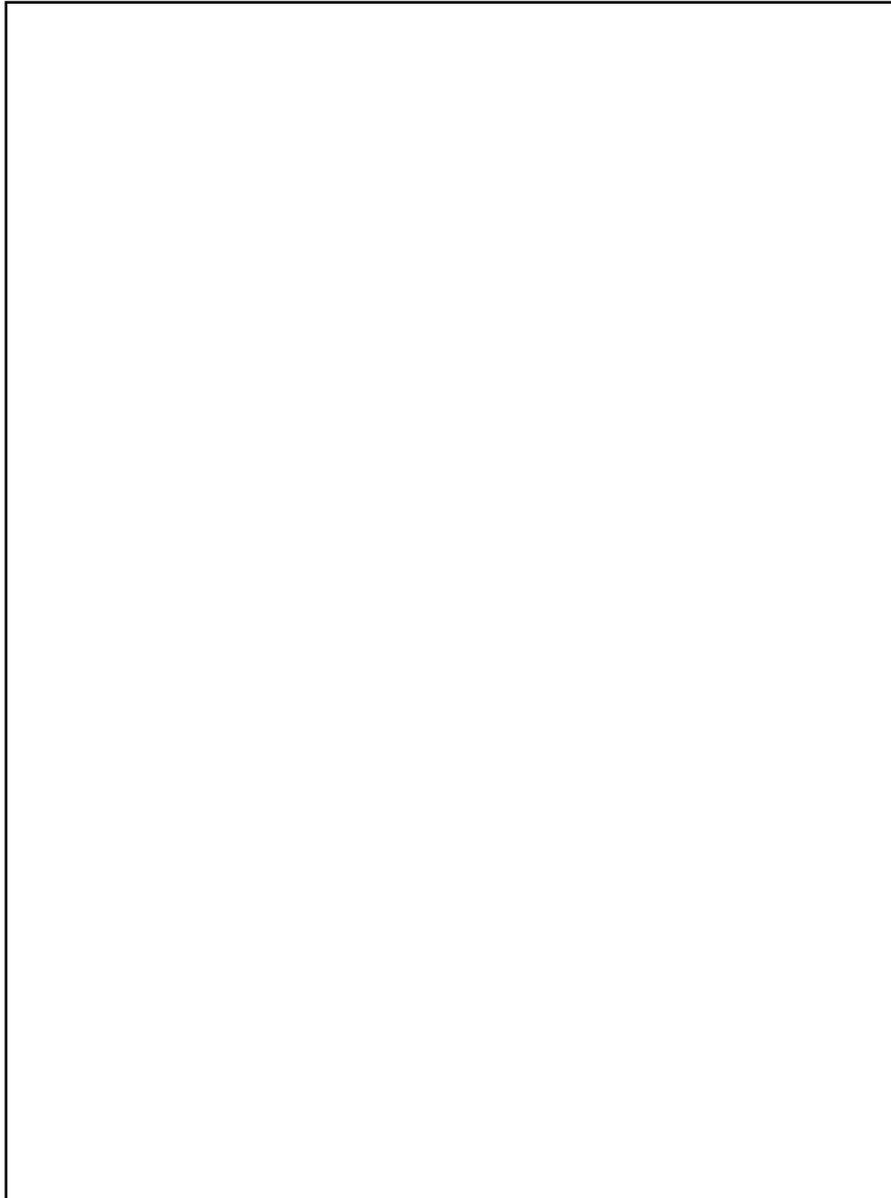
DHS notes the commentor's concern regarding the small-scale vaccine and reagent production laboratory (current good manufacturing practice or cGMP module is part of the NBAF). Under the Virus-Serum-Toxin Act, the USDA/APHIS, Veterinary Service's Center for Veterinary Biologics is responsible to license all veterinary biologics (vaccines, antisera, bacterins, and diagnostic reagents and test kits). 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). The cGMP module would have the ability to develop up to 30 liters of vaccine; however, it should be noted that no live FMD virus vaccines would be developed in this facility, only recombinant or inactive virus fragments would be used. Since the cGMP facility would be housed within the main NBAF building and no live FMD virus would be used for vaccine production, the type of incident that occurred at the Pirbright facility in

the United Kingdom would not occur. NBAF research studies would provide consistent/reproducible data on products and processes of biological countermeasures, which would allow technology transfer to industry partners/contract manufacturers (not in the NBAF) for scale-up and commercial product manufacturing. The industry/manufacturer would be selected using an open competition.

DHS notes the commentor's statement. The risk assessment and methodology described in Appendix E and Section 3.14 represents a reasonable, conservative, and well-thought approach to determine hazards associated with potential accidental releases.

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.

DHS notes the commentor's views and 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 has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species. As described in Section 2.3.1, DHS's site selection criteria 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. Nevertheless, 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.

Comment No: 7                      Issue Code: 27.0

DHS notes the commentor's statement. DHS notes the commentor's suggestion. Section 2.4.3 of the NBAF EIS describes other alternatives considered including using existing laboratories. However, this was dismissed from further study because no other facility exists in the United States capable of conducting the research to satisfy the USDA and DHS missions. DHS notes the commentor's preference for siting the NBAF in a more isolated location such as the current Plum Island location. The NBAF EIS fully analyzes the Plum Island Site Alternative.

Walker, Sally

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payer money was used to figure out which U.S. taxpayer funded lab the Anthrax came from in the last 7 years. The question is: is another lab justified? I say, use existing Australia and Canada facilities for the most dangerous pathogens, and continue with the current upgrade to Plum Island. But keep NBAF off the mainland U.S.

7Cont.|27.0

Further, congressional inquiry into the safety of the Plum Island facility found many egregious errors, miscommunications or lack of communication between DHS and the subcommittee analyzing the safety of Plum Island. DHS denies those accusations according to the people I talked too at the Public meeting, but they have yet provided me with the information to counteract the GAO and Congressmen Dingell's findings, which are not discussed in this document, although many other comments from those reports are.

**3. Executive summary 1.0:** "Agriculture is the largest industry and employer in the United States, generating more than \$1 trillion in economic activity annually, including more than \$50 billion in exports. U.S. agriculture is threatened by the entry of foreign pests and pathogens that could harm the economy, environment, plant and animal health, and public health. A key component of this economy is the livestock industry, which contributes over \$100 billion annually to the gross domestic product. Diseases affecting livestock could have significant impacts on the U.S. economy and consumer confidence in the food supply"

It is for that reason that Congress passed an act in the 1950's restricting labs that study such diseases to islands. Tagged on to the recent Farm Bill, DHS was able to get around that long-standing Congressional Code, to allow the DHS to build such a dangerous facility on the mainland U.S. I, as a US Taxpayer, am appalled that the DHS wishes to risk putting a BSL3Ag/BSL4/ASBL4 lab right in the middle of livestock, students, and our river that gives us our drinking water. Based on human pathogen BSL4 labs like the CDC, there is a "mild to moderate" risk that dangerous pathogens can get out, in which case, as per the DHS statement, we stand to lose much more money than the NBAF will ever bring in, if it does. The risk for a BSL3Ag/BSL4 facility has not been modeled in this EIS report, because no lab BSL3Ag/4/ASBL4 lab exists. Therefore, we do not know the risk of such a facility. But, given the Pirbright lab incidence, just with Foot and Mouth disease (a BSL3 disease), the untold slaughter of livestock and the economic damage was great. Can Athens-Clarke County afford that? I don't think so if we are worried about shutting off streetlights to save money.

6Cont.|21.2

**4. Executive Summary 1.0:** "The NBAF research mission would be based on current pathogen and disease risk assessments, subject to change as threats and risk assessments change."

**My comments:** Does this statement mean that NBAF could turn into a bioweapons lab, as Plum Island has been, in the event of a major terrorist attack? Hopefully not, as they do have a statement in the DEIS saying they are required by law not to be a bioweapons plant. Does this mean that we'll never know the pathogens that NBAF will study because of National Security? In the event of an accident, how will the citizens and students of Athens-Clarke County be protected? Informed? Reimbursed for economic hardship? If a student becomes infected in the BSL 3 labs, will the public be notified? Current oversight, according to the CDC and congressional reports is lacking for high-level biosafety labs in the United States. The EIS does not discuss any of these issues, because they are assuming (based on little evidence) that this lab is safe, so therefore we don't have to think of any scenarios. We need to think of the worst case scenarios and model them (and not all of the worst case scenarios were modeled in this report, such as explosion of the underground fuel tanks, leaks from such tanks, a large airplane hitting the proposed site, etc.).

8|2.0

**5. Executive Summary 1.0:** "The proposed NBAF would consist of two laboratory facilities and four outbuildings. One of the two laboratory buildings would be the primary research

Comment No: 8

Issue Code: 2.0

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

DHS notes the commentator's question regarding oversight of NBAF operations. Procedures and plans to operate the NBAF will include the Institutional Biosafety Committee, which will include community representatives as described in Section 2.2.2.6 of the NBAF EIS. Should a decision be made to build NBAF and the site selected, DHS would begin transition and operational planning which would include consideration of policies and procedures for public participation, education, and also public advisory initiatives. After DHS determines the viability and nature of such a public advisory and oversight function, appropriate roles and responsibilities would be defined.

Walker, Sally

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building containing the BSL-2, BSL-3E, BSL-3Ag, and BSL-4 laboratories with associated support spaces. The other building would be a laboratory for small-scale vaccine and reagent production."

6Cont.|21.2;  
9|8.2 **My comments:** What is a "small scale vaccine and reagent production" building? How much? What type of vaccines? The Merial plant associated with the Pirbright labs in England had a leak of Foot and Mouth disease, with bad consequences for farmers and citizens in England where this took place. We have a Merial plant here in Athens, it generates vaccines. Will the DHS work with them? The consequences of a leak from the NBAF vaccine facility or a Merial plant in associated with such a facility are not modeled in this EIS report.

6. **Executive Summary 1.0:** "It would either be operated directly by the government or operated by a contractor with strict government oversight."

8Cont.|2.0 **My comments:** Currently, there is no one agency that has oversight of the high-level biosafety labs recently built in the US through Operation BioShield or other federal, state or private mandate. What is the agency that will provide oversight? Is it fair to say that there is no conflict of interest here? The current problem recognized by the CDC in relation to the University of Texas incident shows that institutions are not into protecting even their own students. Rather, they are more interested in protecting their money source. This is a major problem, and I'd rather spend my taxpayer dollars protecting citizens rather than building more biolabs until we know that there is an unbiased oversight agency charged with protecting the public. Contracting out, too, was one of Pirbright's problems, because not all labs are fully funded to maintain the facilities. None of these issues are touched on in the current EIS statement.

7. **Executive Summary 1.0:** "Once the NBAF reaches its life expectancy, DHS may choose to decommission the facility and transition the property for future use. Standard decontamination protocols would be performed according to the Biosafety in Microbiological and Biomedical Laboratories to ensure the health and safety of the workers and the public."

10|23.2 **My comments:** I'd like to know what the "site-specific protocols" are for the proposed NBAF Athens site because it is in an ecologically-sensitive area adjacent to our drinking water source, the Middle Oconee River. This issue of "decontamination of the site" is not addressed. Also, are we guaranteed these that these protocols will be used if another contractor takes over the facility? These issues are not addressed in the EIS document.

8. **Executive Summary 1.0:** "a federal steering committee recommended sites to the DHS selection authority... Some sites were eliminated from further consideration due to weaknesses and/or deficiencies, including the following: • Lack of proximity to existing BSL-3 or BSL-4 research programs that could be linked to NBAF mission requirements; • Difficulty in demonstrating ability to attract world-class researchers and scientists or skilled technical workforce with necessary experience; • Insufficient infrastructure, utilities, or other siting difficulties; and • Insufficient community support."

**My comments:** first, world-class researchers have been leaving UGA in droves because of the lack of support for their endeavors, especially since 2001 (eg., cancer researchers, pharmaceutical researchers, biological and ecological researchers, etc.). Within the last week, the State government's mandate of 8% budget cuts across the board means that science departments at UGA have cut up to 50 to 60% of their operating budgets. UGA also has withdrawn scholarship support for certain students, is planning to eliminate graduate student stipends in the sciences and is cracking down on small, graduate student classes (those that

Comment No: 8 Issue Code: 2.0

.DHS notes the commentator's statement.

Comment No: 9 Issue Code: 8.2

DHS notes the commentator's concern regarding the small-scale vaccine and reagent production laboratory (current good manufacturing practice or cGMP module is part of the NBAF). Under the Virus-Serum-Toxin Act, the USDA/APHIS, Veterinary Service's Center for Veterinary Biologics is responsible to license all veterinary biologics (vaccines, antisera, bacterins, and diagnostic reagents and test kits). 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).

The cGMP module would have the ability to develop up to 30 liters of vaccine; however, it should be noted that no live FMD virus vaccines would be developed in this facility, only recombinant or inactive virus fragments would be used. Since the cGMP facility would be housed within the main NBAF building and no live FMD virus would be used for vaccine production, the type of incident that occurred at the Pirbright facility in the United Kingdom would not occur.

NBAF research studies would provide consistent/reproducible data on products and processes of biological countermeasures, which would allow technology transfer to industry partners/contract manufacturers (not in the NBAF) for scale-up and commercial product manufacturing. The industry/major manufacturer would be selected using an open competition.

DHS notes the commentator's concern about the Athens-Clarke County Public Utilities Department's ability to treat NBAF Wastewater. Section 3.3.3 of the NBAF EIS addresses both the current sewage system capacity and infrastructure and the sewage system improvements required to handle NBAF discharges. The NBAF would be designed and operated as necessary to prevent negative impact to the Athens-Clarke County Public Utilities sewage treatment capabilities resulting from flow rate or potentially harmful wastewater constituents. Specifically, as summarized in Section 3.15 of the NBAF EIS, pre-treatment of liquid waste streams would be implemented as necessary to meet treatment facility acceptance criteria, therefore avoiding potential impacts.

DHS notes commentator's concern that diesel fuel will be stored in underground tanks for NBAF emergency generator operation at the South Milledge Avenue Site Alternative. The current design concept of the NBAF at the South Milledge Avenue Site specifies only above-ground tanks for fuel storage. No underground tanks are included in the NBAF design.

DHS notes commentator's concern that fuel oil will be stored in underground tanks for NBAF emergency generator operation at the South Milledge Avenue Site Alternative. The current design of the NBAF at the South Milledge Avenue Site specifies only above-ground tanks for fuel storage. No

underground tanks are included in the NBAF design. Section 2.2.2.5 Pollution and Spill Prevention, identifies the control and countermeasure requirements and plans required for the operation of fuel oil storage tanks at the South Milledge Avenue site and include a Pollution Prevention Plan, a Spill Prevention Control and Countermeasures Plan and a Storm Water Pollution Prevention Plan. Implementation of all plans will prevent impact to surface water and groundwater resources.

DHS notes the commentor's concern regarding the estimated usage of potable water and generation of wastewater from the NBAF operation at the South Milledge Avenue site. Section 3.3.3.3.1 of the NBAF EIS estimates the total annual water consumption at 43,000,000 gallons per year. Section 3.3.3.3.4 of the NBAF EIS estimates the annual wastewater volume at 26,500,000 gallons per year.

DHS notes the commentor's concerns regarding possible impact to the area's water resources. The information cited by the commentor from Appendix E, Section E.3.4.5 was inaccurate and has been removed from the NBAF Final EIS. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, spill prevention, and waste management. The NBAF EIS Section 3.13.1 describes the methodology applied to Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3 and 3.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

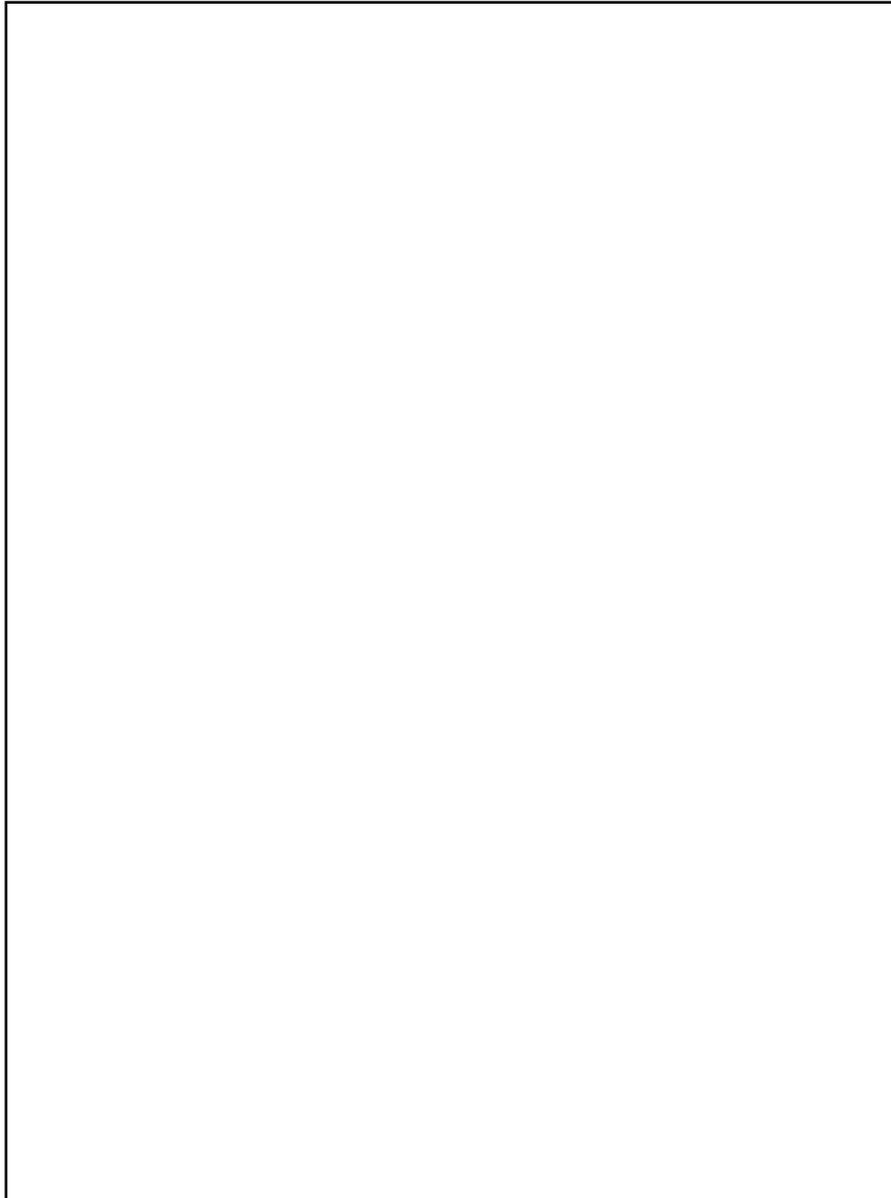
Comment No: 10

Issue Code: 23.0

Resource-specific mitigation measures are identified in the NBAF EIS and summarized in Section 3.15 of the NBAF EIS. The mitigation measures described in this section would be adapted, as appropriate. Should a decision be made to build the NBAF, all practicable means to avoid or minimize potential adverse effect from the selected alternative would be incorporated into the design of the NBAF. Further, the Record of Decision would identify any required mitigation, monitoring, and enforcement programs that would be necessary to offset any environmental impacts associated with the NBAF.

DHS notes the commentor's concerns regarding the effects of construction on bedrock in the area. The NBAF EIS Section 3.6.3 describes the South Milledge Avenue Site alternative's soil and geological conditions and Section 3.6.3.2 describes potential construction consequences. A detailed geotechnical report will be prepared for the selected site and will be used in the NBAF's final design specifications including subsurface rock strata and construction implications. The proposed NBAF developed footprint will reduce the allowable area for groundwater recharge, however preliminary design parameters such as pervious pavement and stormwater reuse will minimize the effect.

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. 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.

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1cont.|25.2 | have less than five students) so that graduate students have no classes to take in some science departments. Therefore, I would argue that UGA is a poor choice for your proposed lab because the "skilled technical workforce" will not be there for you; it is not going to turn around, because this has been going on since 2001, and we are down more than 600 faculty members and counting. You can read President Adam's letter outlining the budget cuts to our chancellor if you don't believe what I say (available online).

5Cont.|12.2 | Second, the citing of the proposed NBAF facility is in the Oconee Watershed region, is a major problem. Somebody wasn't doing their homework when they suggested this area to you, and I'll comment on that later.

3Cont.|4.2 | And lastly, the community has not been adequately informed of this facility (although DHS has posted notices, I am not faulting you at all), that is: UGA has not informed its faculty, staff, or students of the pros- and cons- of such a facility; the local government also has not informed its citizens of the pros-and cons of such a facility; the local paper has, up until a few days ago, tamped down on any opposition to speak up about the "cons" of such a facility, in fact, calling anyone who raises issues about water or safety a "protector" or "ranter". And, at the Public DHS meeting on Thursday night, the Dale Cordley presenter skipped the "Risk" slide and thereby did not inform the public of the "cons" of such a site. He couldn't even list the pathogens when asked by a member of the audience. All these items are a disservice to the citizens of Athens, Oconee County and the workers/students who attend UGA. Please take these issues in mind, as it is clear that the community here has not been informed about the issues in an unbiased manner. A few people have pushed this initiative and the majority of the public has been kept out of the loop, including myself. I had to do a lot of independent searching to get anything on this facility (at first I was for it because I am all for research, until I read all the reports; this is a serious endeavor).

*9. Executive Summary: "...South Milledge Avenue Site... closer to surface waters, so the potential for effects are greater... Runoff from the construction site has the potential to enter surface or groundwater sources, but storm water management during construction would minimize the potential for this to occur. Similar effects could occur with operation of the NBAF... Strict compliance with storm water pollution prevention plans and spill management protocols would minimize the potential and mitigate the potential effects of a spill." "Cumulative Effects. There would be minor cumulative effects to air quality, water supply, wastewater treatment capacity, and traffic with some of the site alternatives. Water use at the South Milledge Avenue Site ... would contribute to regional water use during the current drought conditions, although there are few large regional development projects planned for the near future."*

**Water is the most fundamental issue not fully addressed in the EIS report for Athens.** Water provides for the beauty and ecology of our area, as well as our drinking water, sewage dilution, recreation, and functioning of our city. Athens is cited within the Oconee watershed region, a region that drains into the Altamaha River, one of the seventh most endangered rivers, not to mention its species, in the U.S.

5Cont.|12.2 | **From NBAF siting report, part of DEIS released on 25 July 2008:**  
**"Water: Dual water service is required to the site with a minimum delivery pressure of 35 psi. Water consumption ranges between 50,000 and 275,000 gallons per day with a peak flow rate of 657 GPM. The maximum value includes cooling tower make-up water for peak cooling days during the summer months and is less other times of the year. The estimated total annual water consumption is 43,000,000 gallons."**

The estimated amount is more than Athens-Clarke County can give you, even in a good year. Last year, 12 cfs ran through the Middle Oconee near the proposed NBAF facility, a

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trickle compared to what you need. The statement in the 25 July report contradicts the Executive summary amounts. We are in a massive drought year, and things are not looking better.

5Cont.|12.2;  
9Cont.|8.2

*"Discharge to the sanitary system ranges between 50,000 and 150,000 gallons per day with an annual estimated discharge of 26,500,000 gallons. If a tissue digester is utilized for carcass disposal a small percentage of the effluent stream would have the following composition. BOD (mg/L) 10,250 COD (mg/L) 19,600 Suspended Solids (mg/L) 1,400 pH 9.48 It is anticipated that a dilution level acceptable to the local sewer district would be achieved based on the total effluent discharge from the facility. This would be confirmed as part of the detailed design phase."*

This amount of discharge will overload our already overloaded system. We need a new wastewater facility plant, but none is on the horizon. NBAF will not help matters any in this regard, and this could be a major biohazard problem. The lack of water based on extreme drought conditions in this area does not provide enough water to "mix" the wastewater coming from the proposed NBAF facility. This is one of the most fundamental issues precluding the safe operation of such a facility in Athens. Why you haven't been informed of this is very worrisome.

9Cont.|8.2

**10. Gas, fuel oil:** 1.6 million gallons of fuel oil to run Plum Island, not known for Athens. Are there underground storage facilities planned to store this fuel? How will it get to the proposed NBAF plant, and what are the safeguards this fuel will not leak into the surrounding bedrock or surface wetlands that flow directly into the Middle Oconee River? This is not discussed in the EIS statement.

6Cont.|21.2;  
9Cont.|8.2;  
5Cont.|12.2

*Appendix F DEIS: "Earthquake, Lightning, and High Winds – An earthquake is postulated to upset experimental and safety equipment; damage facility barriers such as the HEPA filters, plenums, or other elements of the ventilation system; and/or impair or eliminate utility services (power or fire suppression) and potentially fail the building structure, resulting in a release of a microbiologic hazard with the potential for direct or indirect exposure. This scenario was further evaluated in the accident analysis due to the impact from a system failure. Although lightning strikes and high winds may be less likely to upset experimental and safety equipment, damage barriers such as the HEPA filters and HVAC system and/or impair or eliminate utility services compared with an earthquake, it is conservatively assumed that all three accident initiators result in the same equipment failures and consequences. It is also postulated that lightning strikes and earthquakes have sufficient energy to be considered as fire initiators."*

Have these factors been modeled appropriately? The risks are low according to the DEIS, however, they do occur, and when they happen, what will ensue? This needs to be modeled, not that the likelihood is low that these events will happen. Figure e.4.2.1-1 shows that earthquakes are relatively common in the area, unlike Texas. Therefore, the risk is much higher than the DEIS has modeled.

**Siting document, 25 July 2008:**

**"Natural Gas:** The CUP should be provided with a 10 PSI natural gas supply to meet the installed natural gas burning equipment firm capacity of 133,500 CFH.

**Fuel Oil:** Multiple fuel oil tanks serving the boilers and generators with a total capacity of 550,000 gallons are required..."

These tanks would most likely be located underground, adjacent to a wetland, and near the Middle Oconee River. Leaks from such tanks have not been modeled in the DEIS, nor the effect of an earthquake or conflagration on such facilities.

**11. Air quality** affected by constructing, transportation, boilers, generators, and incineration of carcasses, "not likely to affect regional air quality".

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11|9.2 | Re: siting document data, 25 July 2008: There are considerable air quality problems stemming from boiler and generator emissions that have not been modeled in this DEIS document; tons upon tons of particulates will be sent into Athens air as printed in the 25 July document. This does not include incineration particles (nor the stench associated with such a facility). This is a major problem, as Athens is hardly in compliance with air quality standards, and the proposed NBAF emissions will definitely send it into non-compliance. Therefore, I do not see that air quality is "not likely to be affected."

**12. Noise.** "Noise effects would be similar for all sites, although residential or recreational receptors near the South Milledge Avenue Site ... may be more likely to be affected."

12|10.2 | Construction, running generators and boilers can potentially cause a lot of noise. Definitely the South Milledge site will be more affected than any other site because of its wildlands/pasture/wetlands/forest location. I agree with this statement.

**13. Sewer** run between 25 million and 30 million gallons of treated wastewater per year.

9Cont.|8.2 | Based on the 25 July 2008 siting document the proposed facility could potentially run almost 300 million gallons of water through it a day, isn't this a low estimate for our sewage systems that is posted in the Executive summary?

13|11.2;  
10Cont.|23.2;  
12Cont.|10.2;  
11Cont.|9.2 | **14. Geology and soils.** Not addressed, focus on excavation of soils ("*Temporary effects to soils...due to site clearing...*"), but the Athens site is located on bedrock, indicating extensive and expensive blasting would ensue in bedrock, not soils, to build the facility, causing major noise level problems, enhanced air quality problems, increased siltation into the Middle Oconee River, and destruction and/or modification of wetlands without any mitigation mentioned; in addition, fracturing of such bedrock to allow water to flow through it, potentially allowing for more sources of non-point pollutants.

"It is not anticipated that prime or unique farmlands would be affected, although coordination with the NRCS is not complete"

14|26.2 | The proposed Athens siting is within farmland on the UGA campus, the fact that an EIS for farmland/pastureland/wetland was not done is unacceptable; the public has not been informed.

Up to 520,000 square foot structure to be built in this area...

**15. Biological Resources.** "*The clearing would remove approximately 30 acres of vegetation, although all of the sites have been previously disturbed to some degree. Wetlands would be affected at the South Milledge Avenue Site from road and utility crossings (less than 0.5 acres), and approximately 0.2 acres of forested uplands would be lost. Threatened or endangered species, aquatic resources, and wildlife would not be directly affected by construction or normal operations at any site. An accidental release of pathogens from the NBAF would adversely affect selected wildlife populations*"

14Cont.|26.2;  
15|13.2;  
2Cont.|12.2 | None of these statements have been addressed in the body of the EIS document as per EPA guidelines for NEPA (1999 on NEPA website: *EPA Considering environmental monitoring for EIS statements*). Deforesting 30 acres of vegetation located adjacent to the Middle Oconee River would have deleterious effects on stream ecology where over 90 species of macroinvertebrates reside (Grubaugh and Wallace, 1995, *Limnol. and Oceanogr.* 40: 490-501). These macroinvertebrates provide the major food source directly or indirectly for mammals including humans, reptiles, amphibians, birds, fish, and other invertebrates in this region. Further, the Middle Oconee River is where Athens draws most of its drinking water.

Comment No: 2 Issue Code: 10.2

DHS notes the commentor's concerns regarding the effects of construction on bedrock in the area. The NBAF EIS Section 3.6.3 describes the South Milledge Avenue Site alternative's soil and geological conditions and Section 3.6.3.2 describes potential construction consequences. A detailed geotechnical report will be prepared for the selected site and will be used in the NBAF's final design specifications including subsurface rock strata and construction implications. The proposed NBAF developed footprint will reduce the allowable area for groundwater recharge, however preliminary design parameters such as pervious pavement and stormwater reuse will minimize the effect. Section 3.5.3 of the NBAF EIS describes the potential construction and operational consequences from noise affects at the South Milledge Avenue Site alternative. Once a site is selected, a detailed geotechnical report will be prepared and results included in construction management efforts. If blasting is required, steps will be taken to minimize the blast number(s), intensity, and duration. A blasting plan would be developed implementing blasting measures such as minimizing explosive weights, stemming depths and material, and delay configurations all to mitigate potential noise levels.

Comment No: 9 Issue Code: 8.2

DHS notes the commentor's statement. The evaluation conducted for the NBAF EIS used to most current information provided by the design engineer and DHS. The 25-30 million gallons of treated wastewater per year potentially generated by the NBAF is consistent with the July 25, 2008 Site Characterization Study cited by the commentor.

Comment No: 11 Issue Code: 9.2

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. 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 and refined modeling performed as necessary in accordance with state-specific air quality permitting requirements. DHS would be required to comply with permit-established requirements.

DHS notes the commentor's concern for air quality. NBAF's potential construction effects on air quality are discussed in Section 3.4.3.2 of the NBAF EIS. 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: 12 Issue Code: 10.2

DHS notes the commentor's statement.

DHS notes the commentor's concerns regarding the effects of construction on bedrock in the area. The NBAF EIS Section 3.6.3 describes the South Milledge Avenue Site alternative's soil and geological conditions and Section 3.6.3.2 describes potential construction consequences. A detailed geotechnical report will be prepared for the selected site and will be used in the NBAF's final design specifications including subsurface rock strata and construction implications. The proposed NBAF developed footprint will reduce the allowable area for groundwater recharge, however preliminary design parameters such as pervious pavement and stormwater reuse will minimize the effect. Section 3.5.3 of the NBAF EIS describes the potential construction and operational consequences from noise affects at the South Milledge Avenue Site alternative. Once a site is selected, a detailed geotechnical report will be prepared and results included in construction management efforts. If blasting is required, steps will be taken to minimize the blast number(s), intensity, and duration. A blasting plan would be developed implementing blasting measures such as minimizing explosive weights, stemming depths and material, and delay configurations all to mitigate potential noise levels.

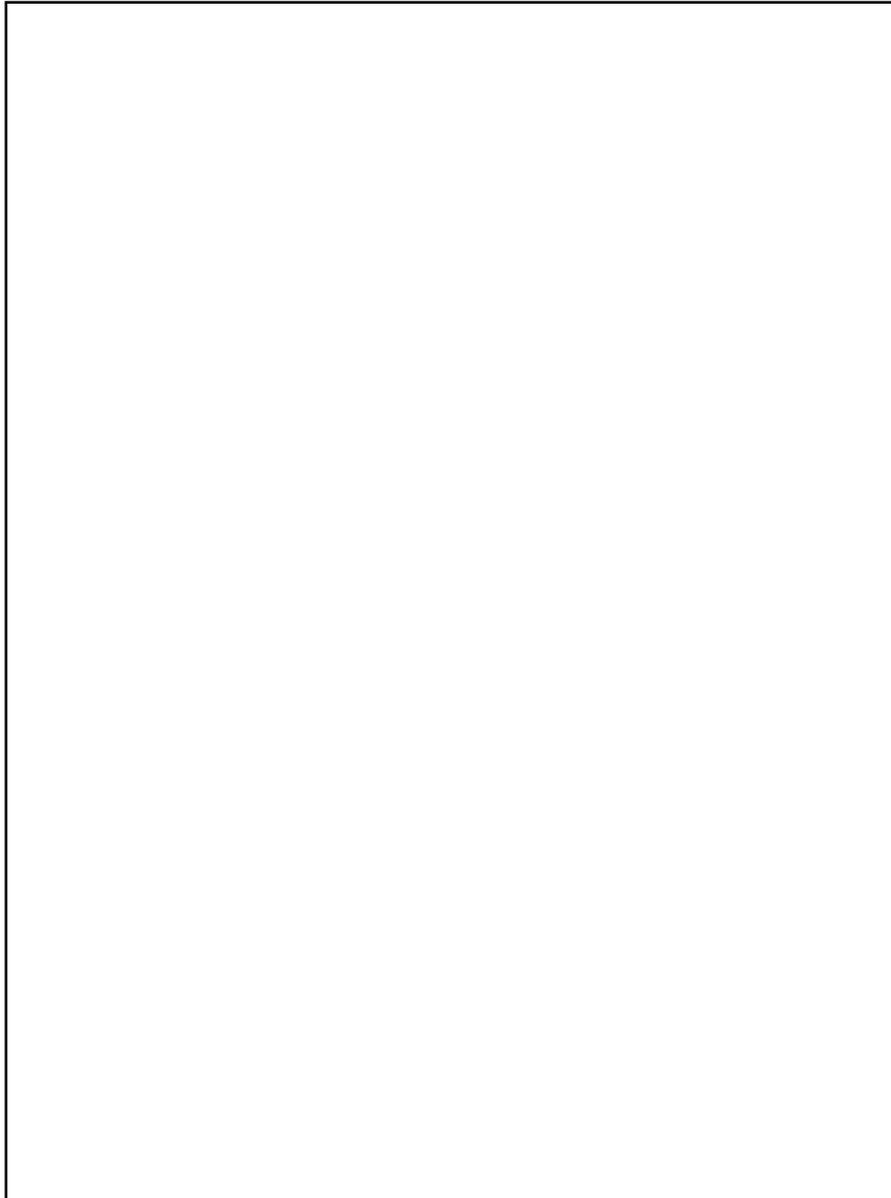
Comment No: 13                      Issue Code: 11.2

DHS notes the commentor's concerns with noise from potential blasting of bedrock. Section 3.5.3 of the NBAF EIS describes the potential construction and operational consequences from noise affects at the South Milledge Avenue Site alternative. Once a site is selected, a detailed geotechnical report will be prepared and the results included in construction management approaches. If blasting is required, efforts will be taken to minimize the blast number(s), intensity, and duration. A blasting plan would be developed implementing blasting measures such as minimizing explosive weights, stemming depths and materials, and delay configurations all to mitigate potential noise levels. The current design does not include use of groundwater resources; however, a basement structure could alter on-site groundwater flow patterns. Any facility infrastructure located in the basement area would be contained in the event of a spill or leak.

Comment No: 14                      Issue Code: 26.0

DHS notes the commentor's statement. 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.

Comment No: 15                      Issue Code: 13.2



DHS notes the commenter's concern regarding potential effects on the Middle Oconee River adjacent to the South Milledge Avenue Site. As indicated in Section 3.8.3.2, the NBAF would affect primarily pasture areas consisting of non-native cultivated forage grasses. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian buffer; however, impacts to the forested 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 buffer would be preserved, and would continue to provide an effective buffer for the Middle Oconee River.

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2Cont.12.2 | The EIS has not addressed the impact of removal of 30 acres of riparian and woodlands that are now protecting part of the Middle Oconee watershed region, in terms of providing water, filtering such water, and reducing siltation to the river. An "accidental release of pathogens" and its effects on this watershed system has not been addressed.

**16. Cultural Resources.** *"No effects to cultural resources are expected to occur with construction or operation of the NBAF at any site. Consultation with state and federally recognized Native American Indian tribes has been initiated."*

16|14.2 | How can they find "no effects" when they haven't even inquired if there are cultural artifacts on this site? Because the Middle Oconee River is an archaeologically-important river, humans tend to live on rivers, it stands to reason that they could be altering an archaeological site. The fact that such a study was not done is a breach of the public trust in the federal government, and since UGA is government land, the public has a right to know.

**17. Socioeconomics:** *Operation of the NBAF would result in 250 to 350 direct jobs and an estimated income of between \$26.8 million and \$30.4 million annually. "Losses could be particularly severe in states where animal and crop production is concentrated. For example, Iowa, North Carolina, and Minnesota produce 53% of the total U.S. swine production (GAO 2005a)."*

17|15.2; | If foot and mouth disease is accidentally or intentionally released from this facility, it is estimated by the EIS that it would cost GA 300 million dollars in lost revenue and other factors. What NBAF will potentially make pales in comparison to what Athens-Clarke County could lose (and the state of GA), not to mention the town of Watkinsville. We already know that most of the direct jobs will go to the Plum Island scientists and staff, so what will Athens be gaining to help the impoverished people? Not very much. UGA, however, would gain a lot, but only a few select groups of people. Also, if an outbreak occurs here, North Carolina will also be shut down. What will be the collateral costs be? We don't know, as they aren't in this report. The FMDV outbreak at the high-level biocontainment labs at Pirbright in 2007 show that the collateral costs are great, but the full amount has not been tallied as of yet.

18|18.2 | **18. Existing Hazardous, Toxic, and Radiological Waste.** The proposed Athens site has not been evaluated for the existence of hazardous waste, etc. It was recently found that the State Botanical Garden had repositories of hazardous wastes, so why hasn't the proposed NBAF site been evaluated as well? If the construction will take place in a watershed area of the Middle Oconee River, this would be important to know. This is a grave oversight, and needs to be undertaken.

**19. Waste management.** *"Construction would generate construction debris, sanitary solid waste, and wastewater. Operation of the NBAF would result in generation of wastewater, waste solids, and medical, hazardous, and industrial solid wastes." "Another FMD outbreak occurred in Surrey, England, in August 2007. An epidemiological investigation report concluded that the live virus release was most likely from the drainage system...It is believed that the virus was carried offsite...Estimates of direct costs for a FMD outbreak in the U.S. similar to the United Kingdom outbreak run as high as \$24 billion, with the destruction of about 13 million animals. Even a single case of the disease would cause our trading partners to ban imports of live animals and animal products from the U.S. and could result in losses of between \$6 billion and \$10 billion per year while the country eradicated the disease and regained disease-free status (GAO 2003)."*

7Cont.21.2 | One leak would cost Athens-Clarke County in lost UGA football revenue, students, tourism, and jobs that it would not recover unless massive federal funds were given to supplant this lost

Comment No: 16 Issue Code: 14.2

DHS notes the commentor's statement. The Georgia Department of Natural Resources, Historic Preservation Division has determined that no historic or cultural resources would be affected by the NBAF at the South Milledge Avenue Site and compliance of the provisions under Section 106 has been completed and compliance with the consultation provisions of Section 106 of the National Historic Preservation Act has been achieved. A copy of the agency correspondence is provided in Appendix G of this NBAF Final EIS.

Comment No: 17 Issue Code: 15.2

DHS notes the commentor's concern. The risk of an accidental release of a pathogen is low, but DHS acknowledges that the possible economic effect would be significant for all sites. The potential economic effects including those from an accidental release are discussed in Appendix D and Section 3.10.9 of the NBAF EIS. The primary economic effect of an accidental release would be the banning of U.S. livestock products regardless of the location of the accidental release, which could reach as high as \$4.2 billion until the U.S. was declared foreign animal disease free.

Comment No: 18 Issue Code: 18.2

DHS notes the commentor's concern about existing hazardous waste contamination. Section 3.12 of the NBAF addresses existing hazardous, toxic, or radiological waste contamination at all of the candidate NBAF sites. The methodology used to prepare the section is presented in Section 3.12.1 and information for the South Milledge Avenue Site is in Section 3.12.3. Based on the information provided by the Phase I environmental site assessments performed for the South Milledge Avenue Site, DHS concluded in Section 3.12.3.2 that "no construction or operational impacts are anticipated due to existing hazardous, toxic, or radiological waste contamination."

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income. These losses have not been figured into the current EIS document. Even England had to stop their soccer, rugby matches, and even postponed a national election because of a foot and mouth outbreak in 2001.

## 20. Health and safety.

A.) *"The results indicate that for all sites the risk was none to low for all accident scenarios except an over-pressure fire, where an explosion would occur due to the buildup of a large amount of gas or flammable chemical in an enclosed area. The risk for an over-pressure fire accident was moderate for all sites. For all sites except the Plum Island Site, the overall risk rank was moderate due to the potential easy spread of a disease through livestock or wildlife. The risk rank for the Plum Island Site was low or none due to the low likelihood of any disease getting off of the island"* "In addition to BSL-4, the NBAF would have animal biosafety level-4 (ABSL-4) in which special biocontainment features are used to conduct research involving high-consequence livestock pathogens in large animal species. In this document, BSL-4 refers to both BSL-4 and ABSL-4. " "Diseases affecting livestock could have significant impacts on the U.S. economy and consumer confidence in the food supply (GAO 2003). " "Accounts of laboratory-acquired infections (LAI... there was no federal requirement. As a result, the collected data have necessarily been incomplete (Schell 2006; CDC and NIH 1999). Also, it has been suggested that these reports might under-represent the true number of LAI because they do not account for subclinical (asymptomatic) infections. Collection of accurate data regarding LAI continues to be "hampered by an indifference to and, frequently, an unwillingness to report these incidents" in part "due to fear of reprisal and the stigma associated with such events" (Harding and Byers 2000; Harding and Byers 2006)."

8Cont.|2.0 | There is no oversight of the proposed NBAF facility, which is a very real risk, affecting students and citizens of Athens-Clarke County. Given the lack of self-policing as discussed by the DEIS (see above quote), this is one of the most dangerous problems. The *Harvard Crimson* in 2007 had this to say about a Boston University biosafety infringement: "addition to concerns about the facility itself, Boston City Councillor Charles H. "Chuck" Turner '62 said at the meeting that he lacked confidence in BU's safety procedures. Turner referred to a 2004 incident in which three BU researchers fell ill after unknowingly handling a contaminated strain of the bacteria tularemia. However, according to the Boston Globe, BU officials did not report the illnesses to the Boston Public Health Commission until 28 days after DNA analyses revealed the strains under study had been contaminated. The Globe also revealed that BU failed to update its proposal for a BSL-4 lab, which claimed that BU labs had experienced no "laboratory-acquired infections" in more than 10 years, after the infections had been discovered."

19|21.1 | B.) The DEIS Appendix B (June 2008) outlines that incidents are "decreasing", it is not convincing given the previous sentence saying that such incidents are under-reported. Further, the GAO has detailed many lapses at the Plum Island site, but these are not discussed in the DEIS. Please document those lapses in lab safety from the Plum Island facility and why the GAO had to investigate the lab.

2Cont.|5.0;  
6Cont.|21.2 | C.) It is clear from the EIS statement that the safest place for such a facility housing a BSL3Ag/BSL4 lab is either on an island or a remote desert somewhere far away from people, livestock, out of prevailing winds and watersheds that provide drinking water. Even Plum Island is too close to the mainland for such a proposed facility. Risks involving a BSL-4/ABSL-4 lab were not modeled for this report, and thus, the public has no way of knowing what the risks really are. If such a leak occurred, intentionally or accidentally, from any of the labs that have been built since 2001, including the proposed mainland citing of NBAF, this is of greater risk because the pathogens will be here, right in downtown Athens. One of

Comment No: 19 Issue Code: 21.1

DHS notes the commentor's statement. Appendix B includes a comprehensive list of incidents that have occurred in the U.S. and worldwide and includes the incidents at Plum Island. This information was used to help determine the types of accidents and consequences that were used in the risk assessment found in Section 3.14 and Appendix E of the NBAF EIS.

Walker, Sally

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## WD0674

the reasons given for the Anthrax scare is that the scientist was worried about funding; the Anthrax scare allegedly gave this person lots of funding. Human error and maintenance problems are the chief causes of leaks at high-level biosafety labs.

*D.) DEIS appendix E-70: "Under proper laboratory procedures, the likelihood of a worker inhaling or otherwise becoming exposed (e.g., through cuts in the skin or ingestion) to an infectious agent should be low."*

This is an unsupported statement, please explain why this is, when most lab incidents that I am aware of are caused this way (including needle/knife pricks).

20|19.0

*E.) DEIS appendix p. E-70: "Workers would receive annual physical examinations and consultation about biological work hazards, and recommended vaccines would be administered by the medical staff."*

The DEIS outlines that almost all the diseases to be studied at the NBAF facility have no vaccines or cures; this is a misleading statement suggesting to the public that this facility is absolutely safe for medical personnel and others working there. Please modify this statement to remind people that there are no vaccines for most of these diseases.

*F.) DEIS appendix E 3.4.2: "FMDV and Nipah virus are not considered as having a biological vector transmission".*

Any animal can be a biological vector, not just ticks, etc. According to the CDC: "The natural reservoir for Hendra virus is thought to be flying foxes (bats of the genus *Pteropus*) found in Australia. The natural reservoir for Nipah virus is still under investigation, but preliminary data suggest that bats of the genus *Pteropus* are also the reservoirs for Nipah virus in Malaysia".

21|17.0

Bats are biological vectors of transmission for Nipah. If animals aren't vectors, then what is an infectious disease? The DEIS statement is misleading to the public as to the true nature of transmission of these serious, fatal diseases.

*Later, in appendix E, there is this statement: " FMDV spreads quickly through herds and flocks of susceptible animals. With an incubation period of as little as 12 hours, the disease can spread quite rapidly. Cattle are often considered to act as indicators because of the low infectious dose, sheep act as maintenance hosts, and swine act as amplifiers of FMDV. The livestock and wildlife (deer and boar) in the vicinity of the proposed sites provides ample opportunity for FMDV to establish in the environment upon a release. FMDV can persist in the human upper respiratory tract for up to 48 hours, making humans potential vectors if they are exposed. In addition, the ability for FMDV to be spread by fomites and with the large human population in the area, the ability for FMD to spread over large areas also exists. The consequences of a large release of FMD virions would be as severe as that of RVFV or Nipah virus in this area."*

So any animal is a vector, but this is buried in the Appendix section where most of the public won't read it. I welcome this statement, but it is contradicted in earlier statements. Please tell the public that vectors can be any animal, including humans, which is why this facility is very dangerous if located within highly populated areas with students, farm animals, and wildlife next to a river.

*G.) DEIS appendix E 3.4.4: "Humidity greater than 60% and temperatures less than 80oF have been shown to be the most favorable conditions (Garner 1995). (for viral transmission)*

6Cont.|21.2

Georgia is just perfect for this scenario, which makes citing NBAF in Athens not a good choice. A drier, colder or hotter environment would be much better for containment if such vectors escaped. Also, the bovine pleuropneumonia and FMDV don't need many "virions" to

Comment No: 20

Issue Code: 19.0

DHS notes the commentor's statement. Although the statement is accurate, it has been modified accordingly.

Comment No: 21

Issue Code: 17.0

DHS notes the commentor's statement. However, as the commentor states, bats of the genus *Pteropus* are considered "reservoirs" for the Nipah virus, which is transmitted via body fluids and close-contact aerosol means. Foot and mouth disease virus is transmitted via aerosol and not through a vector such as a mosquito or tick.

Walker, Sally

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	<b>WD0674</b>
	infect a host, and these can be carried for very long distances by aerosol in our windy city.
3Cont.125.2	The DEIS models only model escape of pathogens using the Gaussian Plume Model; are there other ways that aerosols can escape the proposed facility, via fomites or within respiratory tracks of workers? That hasn't been modeled.
	H.) DEIS appendix E 3.4.5. Water transmission: "Also, none of the effluent water from the wastewater plant will contribute directly to any potable water source."
	Where is the Data?
23 8.2	"These treatment steps consist of aeration, secondary clarification, disinfection, dechlorination (for environmental discharges), water reuse system, effluent holding ponds, and sludge drying beds. It is anticipated that there would be minimal effects from water-borne transmission."
	It appears that the NBAF facility will have holding ponds and sludge-drying beds; where would these be located? They are not on the facility plans. Will these be in the open air? Underground? How safe are they? Also, to a priori say that these would have "minimal effects" biases your data outcome.
22 21.0	I.) Appendix E, E 4.0: "BSL-4 (Section 1.1, page 4) – (Note: there is little information available on this space except for that represented by the figure in Section 4.4, page 3, so the 15,290 ft <sup>2</sup> = 61 employees was used.)"
	If this is the most dangerous part of NBAF, why is their little information available on this space? This is not good for the public.
	J.) Appendix E, E 4.0: "assuming that there are on the order of hundreds of opportunities to mishandle pathogens in a given year per person, this yields on the order of 6x10 <sup>5</sup> opportunities per employee-year."
	Isn't this a very high rate to encounter and potentially infect a lab worker/employee with pathogens? Or, did I misread this passage?
22 21.0	K.) Appendix E.4.3.1, only small aircraft were modeled in terms of external accidents to the facility and potential release of pathogens. What about large aircraft? It is assumed that such a small crash would burn up the pathogens, but the Pentagon wasn't completely destroyed during 9/11, and if so, how would the proposed NBAF facility stand up to such a horrible attack? This was not modeled, and given that the media has suggested that such a facility could be the siting of a terrorist attack, it should be modeled for our public knowledge and safety.
	L.) I appreciate that the DEIS modeled three of the worst-case scenarios using FMDV, Nipah, and African Rift Fever.
22 21.0	Based on the table, p. E-165, Georgia appears to be like all the other sites (except Plum Island), which is entirely suspect given that it is in a very different climate zone and potential vectors/hazards compared to the other sites (except perhaps North Carolina). If all the data results are the same, there is something wrong with the model or the model was not run properly.
10Cont.123.0	M.) Site security. Site security is not really mentioned; how will the site be secured? What types of security clearance do people have to have to work on such a facility? How long do those clearances take (one fellow said at the Public meeting it took him a year to gain clearance). More worrisome is why two pages of "site security" are blacked out on the NBAF siting report dated July 25 2008.

Comment No: 22 Issue Code: 21.0

DHS notes the commentor's statement. The section of Appendix E cited by the commentor explains how the number of animals and staff that could be handling or exposed to pathogens were estimated. This information was used to determine the number of opportunities to mishandle pathogens for the operational accident scenarios. The assumptions used in calculating the number of employees provided a conservative number of employees as not to underestimate the number of opportunities. The NBAF Feasibility Study does not have the same amount of information with regard to items like freezer rooms, break rooms, or changing rooms for the BSL-4 laboratory because these items are not included in the BSL-4 laboratory. There is actually much information and detail on the BSL-4 laboratory in the Feasibility Study.

DHS notes the commentor's statement. The risk assessment and methodology described in Appendix E and Section 3.14 represents a reasonable, conservative, and well-thought approach to determine hazards associated with potential accidental releases.

DHS Notes the commentor's question. Level of difficulty associated with weaponization of the pathogen refers to the process of going from acquisition of a pathogen to the ability to use it to infect susceptible species.

Comment No: 22 Issue Code: 21.0

DHS notes the commentor's question. The complete text in the paragraph states, "Thus, given roughly 600 employees handling pathogens in a facility operating a nominal 2,000 hours per year (50 weeks per year at 40 hours per week) and assuming that there are on the order of hundreds of opportunities to mishandle pathogens in a given year per person, this yields on the order of 6x10<sup>5</sup> opportunities per employee-year. Controls such as proper training, qualification, procedure use, PPE use, and quality assurance, to name just a few, significantly mitigate (reduce the frequency of human errors) the number accidents that actually happen given this high number of opportunities that exists.

Comment No: 23 Issue Code: 8.2

DHS notes the commentor's statement. All pathogenic wastes will be sterilized prior to being discharged into the municipal sewage treatment systems, but no holding ponds or sludge-drying beds are anticipated with the final design of the NBAF.

Walker, Sally

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WD0674

21. *Environmental justice.* This is not discussed in the proposal, although it is listed in Table ES-3.

22|21.0

*"The priorities assigned to the pathogens identified in these recommendations (FMD, Nipah and Hendra viruses, and emerging pathogens) were based on the following criteria:*

*• Economic impacts; • Virulence and potential for pathogen spread;  
• Zoonotic potential; • Morbidity or lethality of disease; • Likelihood that pathogens will spread to other species; • Ability of terrorists to naturally acquire or otherwise manufacture a particular pathogen; and • Level of difficulty associated with weaponization of the pathogen."*

What does "Level of difficulty associated with weaponization of the pathogen" mean? Please explain.

23|5.1

Finally, if Plum Island is closed, where does this facility get relocated? *"North American FMD Antigen Bank [located at Plum Island]. This bank stores concentrated FMD antigen that can be formulated into a vaccine if an FMD introduction occurs. The bank is owned by Canada, Mexico, and the United States. FADDL employees are responsible for safety and potency testing of new lots of antigen and periodic quality testing of stored antigen."*

*Thank you! Please do not bring NBAF to Athens.*

Comment No: 23

Issue Code: 5.1

DHS notes the commenter's question. At this time, no change in the status of the North American FMD Antigen Bank is indicated. However, if the NBAF is constructed and PIADC is closed, PIADC assets would be assigned to appropriate facilities. The North American FMD Antigen Bank would likely be transferred to the NBAF due to its connection with FMD research to be conducted at the NBAF.

Wallace, Blake

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WD0628

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**From:** Blake Wallace [REDACTED]  
**Sent:** Saturday, August 23, 2008 10:38 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF

1/24.5 | I live in [REDACTED] area/Mississippi and would be proud to have the facility here.

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

**Wallace, Peggy**

**Page 1 of 1**

PD0258

August 24, 2008

1| 24.2

Yes. This is Peggy Wallace and I'm calling from [REDACTED] Georgia. I only want to say that I am very much in favor of the NBAF locating here. And would like, you know, that to go on record.

That's all I have to say.

Thanks.

Comment No: 1

Issue Code: 24.2

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

Walters, John

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WD0424

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**From:** [REDACTED]  
**Sent:** Thursday, August 21, 2008 4:59 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Manhattan, Kansas

1) 24.4 | This email is to show my support for your selecting Manhattan as the site for the NBAF site. We have the resources and the talent to make it successful.  
John Walters

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

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

Warner, Janet

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WD0016

From: [REDACTED]  
 Sent: Friday, June 27, 2008 9:03 AM  
 To: NBAFProgramManager  
 Subject: Comments on the NBAF Draft Environmental Impact Statement

To Whom It May Concern:

I would like to submit the below comments regarding the proposed National Bio and Agro-Defense Facility.

1| 25.0 | After comparing the six proposed NBAF facility sites with a map of cattle and hog farm locations I think it becomes clear that it would be completely irresponsible to locate the facility at either the Butner, NC; San Antonio, TX, or Manhattan, KS sites. The Butner site is adjacent to one of the largest hog farm concentrations in the country and the San Antonio and Manhattan sites are in the middle of the central US cattle region.

2| 21.0 | While I am sure the proposed facility would be designed with every safeguard available, no  
 3| 15.0 | absolute guarantee can be given that organisms will never escape. Imagine the devastation that would be caused if such an event were to happen. Imagine how foolish and irresponsible the US government would look for locating such a facility near a major livestock area.

Thank you,  
**Janet Warner**

[REDACTED]  
 [REDACTED] NC  
 [REDACTED]

Comment No: 1                      Issue Code: 25.0

DHS notes the commentor's opposition to the Umstead Research Farm Site, Texas Research Park Site, and Manhattan Campus Site Alternatives due to their location near livestock.

Comment No: 2                      Issue Code: 21.0

The NBAF would be designed and constructed using modern biocontainment technologies, and operated by trained staff and security personnel to ensure the maximum level of worker and public safety and least risk to the environment in accordance with all applicable federal, state, and local laws and regulations.

Comment No: 3                      Issue Code: 15.0

The potential effects to livestock-related industries is discussed in Section 3.10. 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 risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

## Waters, John C and Charlotte

## Page 1 of 1

WD0590

From: [REDACTED]  
 Sent: Sunday, August 24, 2008 11:50 AM  
 To: NBAFProgramManager  
 Subject: Opposition to NBAD Facility in Athens, GA

Mr. Johnson:

1|25.2; Just a brief note to inform you that I, my wife, and many of our friends, have yet to determine any compelling  
 2|5.1 reason why your proposed facility should be located in Athens GA, or anywhere else but Plum Island, NY, which  
 appears to provide the best protection for citizens of our nation from any negative impacts that may transpire .  
 3|21.2 Assurance of the low probability of mishaps or problems, in Athens or any mainland location, is insufficient given  
 the impact of the potential magnitude and severity of such an occurrence. Not only are we not convinced by  
 protestations to the contrary, but -here in Athens- the mere construction of such a facility, as proposed, will severely  
 impact both the physical, scenic, and environmental quality of our community especially in terms of the scenic  
 beauty of the proposed Milledge Avenue site and the desirability of the surrounding area for any other use,  
 4|12.2; including our State Botanical Garden, flyways, and wildlife habitats. In addition, there is the question of the amount  
 5|13.2; of water your facility would require, when our area is already negatively impacted by over-development which has  
 exasperated our shortage of water over a period of years, as well as the potential pollution of area waterways such as  
 the Oconee River immediately adjacent to your proposed project area.

4Cont.|12.2; Those who argue that the economic impacts of your proposed facility far out-weigh the environmental  
 5Cont.|13.2; concerns are unfortunately either insensitive, naive, or blinded by their miscalculation of the value of money over  
 more important factors. The economic future of Athens-Clarke County will not be determined by the construction of  
 your facility while its environmental quality will be highly endangered.  
 1Cont.|25.2

While our community's leaders seem disinterested in the opinion of the populace, we "vote" NO! A Thousand-  
 times NO! in response to your proposal to locate your facility in our community.

John C. and Charlotte R. Waters

[REDACTED]  
[REDACTED] GA [REDACTED]

Comment No: 1 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: 2 Issue Code: 5.1

See response to Comment No: 1.

Comment No: 3 Issue Code: 21.2

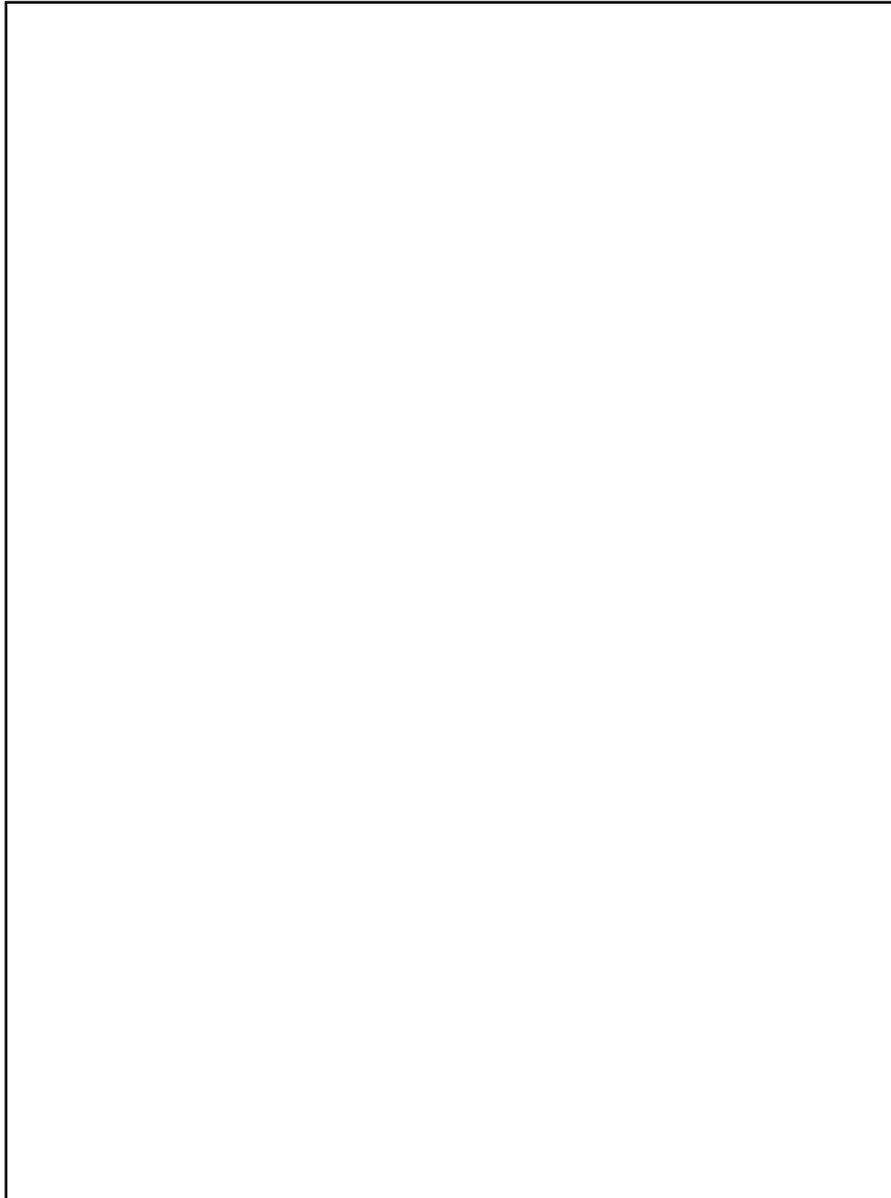
DHS notes the commentor's views on risk. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Section 3.10.9 and Appendix D of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

Comment No: 4 Issue Code: 12.2

DHS notes the commentor's drought concerns and acknowledges regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water, an amount that is expected to be approximately 0.76% of Athens 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes' annual potable water usage. Section 3.7.3.1.1 describes the 3 onsite surface water stream segment features including the adjacent Middle Oconee River. Sections 3.7.3.2 and 3.7.3.3 describe the potential construction and operational consequences including standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 5 Issue Code: 13.2

DHS notes the commentor's concerns regarding negative environmental impacts of siting the NBAF at the South Milledge Avenue Site. As described in Section 3.8.3.1.1, DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 of the NBAF EIS, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. However, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden as indicated in Sections 3.8.3.2 and 3.8.3.3. Further, 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 the NBAF.

Watkins, Cathianne

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WD0298

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**From:** Cathi [REDACTED]  
**Sent:** Saturday, August 16, 2008 7:40 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Athens

Dear DHS,

1|24.2 I was unable to attend the meeting in Athens Thursday, but I wanted you to know that I support locating  
the research facility in Athens. I believe the potential risks are very small compared to the benefits of  
increased jobs opportunities, scientific research collaborations and highly educated residents. Please do  
not be thwarted by our over-zealous protestors who seem to be stuck in another era. My only quibble is  
2|15.2 that it would be preferable to staff the lab with federal employees rather than contractors.

Thank you for your consideration,  
Cathianne Watkins

[REDACTED]  
[REDACTED] GA [REDACTED]

"He is rich or poor according to what he is, not according to what he has." - Henry Ward Beecher

Comment No: 1                      Issue Code: 24.2

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

Comment No: 2                      Issue Code: 15.2

As stated in Section 2.2.2 of the NBAF EIS, the NBAF may be operated as a Government Owned/Government Operated Facility (GOGO) or as a Government Owned/Contractor Operated Facility (GOCO). DHS has not made this determination.