Homeland Security

Science and Technology Directorate

Memorandum for the Record
An Addendum
to the
Final Selection Memorandum for the
Site Selection for the Second Round Potential Sites for the National Bio and Agro-defense Facility (NBAF), Dated July 2007

November 2008

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Reviewed by:

Signed: Nicole Marcson Dated: 11/6/08
Ms. Nicole Marcson, Assistant General Counsel for S&T
DHS, Office of the General Counsel

Signed: _____ Dated: 11/6/08
Mr. James Johnson, Chair, Steering Committee
DHS, S&T, Office of National Laboratories

Approved By:

Jay M Cohen 11/7/08
Jay M. Cohen Date
Selection Authority
Under Secretary, Science and Technology
Department of Homeland Security

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Summary of Decision

As the Site Selection Authority for the NBAF site selection process, I included Plum Island located in Suffolk County, NewYork as a reasonable site alternative for study in DHS's Environmental Impact Statement (EIS) for the proposed NBAF. Therefore, DHS's EIS analyzed Plum Island as a site alternative, in addition to the five (5) site alternatives I selected in July 2007 (please refer to my Final Selection Memorandum for the Site Selection for the Second Round Potential Sites for the NBAF, dated July 2007, discussing my rationale for selecting these five sites). During the site selection process to identify possible locations for the NBAF, the Department of Homeland Security did not believe it was appropriate to respond to its own Request for an Expression of Interest (EOI) with a property owned and managed by DHS. Commencing with the EIS, however, Plum Island is included in the NBAF selection process for evaluation concurrent with the five mainland sites because:

1) Plum Island appears to meet the NEPA requirement that the proposing Federal agency evaluate the range of all "reasonable alternatives" to a proposed action; and
2) PIADC currently fulfills a portion of the NBAF mission and potentially meets some of the NBAF evaluation criteria, including: Proximity to Research by performing Biosafety Level (BSL)-3/3AG research on three foreign animal diseases (FADs); Proximity to Workforce by having an existing skilled workforce in a BSL-3/3Ag environment; and, Acquisition Construction and Operations by the availability of Government-owned property.

Further, I have evaluated Plum Island utilizing the same evaluation process applied to all of the other sites as outlined in my Final Selection Memorandum for the Site Selection for the Second Round Potential Sites for the NBAF, dated July 2007. This process includes the evaluation criteria published in the "Public Notice Soliciting Expressions of Interest (EOIs) for Potential Sites for the NBAF" which appeared in the Federal Register on January 19, 2006, the DHS preferences communicated to all second round potential NBAF sites by letter on December 8, 2006, information collected by site visits by evaluation team members, and observations made by me on my visits to Plum Island. My decision is the result of my integrated assessment and evaluation of the strengths, weaknesses, and risks associated with Plum Island against DHS's evaluation criteria and preferences. This memorandum documents the basis for my decision.

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Decision

Plum Island, Suffolk County, NY Rating

Research	Workforce	ACO	Community Acceptance	Weighted Average Rating
86 Very Good	83 Very Good	82 Very Good	74 Satisfactory	**83** **Very Good**

The Federal employee evaluation panel assigned scores and ratings to Plum Island as measured against DHS's evaluation criteria and DHS's preferences communicated to the other consortia in December 2006. The Federal employee evaluation panel's scores and ratings for Plum Island appear above.

The proposed site includes the Plum Island Animal Disease Center (PIADC) and its included research programs. Through the combined research programs of DHS, United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) and USDA Animal Research Service (ARS), PIADC currently provides the existing BSL-3/3Ag research programs on three foreign animal diseases (FADs) (Foot and Mouth Disease Virus [FMDV], Classical Swine Fever [CSF], and Vesicular Stomatitis Virus [VSV]). Functions at PIADC that are critical to the NBAF mission are: 1) the operation of the FAD school and veterinary training, 2) integration with National Animal Health Lab Network (NAHLN), 3) FMD, African Swine Fever (ASF) and CSF research, and 4) large livestock vaccine development. Therefore, the ongoing research mission accomplished at the PIADC facility is the foremost program available in the country that can be linked directly to the NBAF mission requirements for these specific pathogen research programs. However, PIADC's current capabilities and expertise do not include BSL-4 research programs or active research capabilities applicable to other NBAF mission needs. In addition, although PIADC coordinates with many academic institutes throughout the Northeast, due to the isolated island location, none of these institutes are within a reasonable commuting distance to adequately provide the continuous support and collaboration to compensate the talented, but limited depth of current PIADC research capabilities that would be necessary for the anticipated NBAF program.

A great strength of the current PIADC programs are the history of successfully bringing the best science, including veterinary training and post-doc programs, and the necessary support staff to operate the current facility. However, the constraints of the current program size, cost of living and lack of other supporting academic and research communities would be a weakness in ensuring adequate and efficient staffing to meet the NBAF mission requirements. This issue would be compounded by the island location, with increased commuting times, weather interruptions and restrictions imposed by the necessary ferry service from NY and CT. Similarly, although there is significant space available to construct NBAF, the required infrastructure expansion necessary for NBAF within a nearly self-sufficient island environment significantly increases the capital cost of construction as well as the anticipated operations and maintenance costs over the lifecycle of the NBAF facility.

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The total acreage of Plum Island includes 840 acres and a specific tract of 24 acres on the northern portion of the island has been identified as the most efficient and well suited site for construction of the NBAF. Although the current PIADC operations are nearly completely self-sufficient for infrastructure and utility utilization needs with the exception of electricity, the increased size and utility consumption projections for the NBAF would require significant improvements to the current infrastructure for potable and fire water, waste water, steam, electric and emergency systems that would tax the island's resources and potentially incur additional regulatory burdens. The Plum Island site is approximately 41 miles (from Old Saybrook, CT) to Bradley International in Hartford, CT and 100 miles from Orient Point, NY to John F. Kennedy International Airport in Queens, NY. Following a 15 minute ferry ride to Orient Point or a 40 minute ferry ride to Old Saybrook, the airports are an additional 1.5 – 2.5 hours driving respectively. Island construction incurs additional costs of 15%-24% above similar mainland construction and operation costs and current Government ownership does not provide a mechanism for in-kind State or Consortia contributions that exist at other sites to offset these infrastructure costs.

The local NY and CT communities and associated representatives are very much in favor of continuing the pre-existing and current level of PIADC operations, research programs and associated employment. However, they have been historically and continue to be greatly opposed to increasing the current programs to include BSL-4 research.

Overall, the Plum Island, NY site has significant strengths in that it directly extends the research and current workforce capabilities of the PIADC facility and programs to the NBAF mission. However, the weaknesses posed for the construction and operations of NBAF on Plum Island and vocalized opposition from the local community detract from its potential for success.

Plum Island as a Site Alternative

NBAF Plum Island Site Alternative Report

During the site selection process to identify possible locations for the NBAF, the Department of Homeland Security did not believe it was appropriate to respond to its own Request for an Expression of Interest (EOI) with a property owned and managed by DHS. Commencing with the EIS, however, DHS felt that an analysis of Plum Island similar to the packages received for the other site alternatives, would be required to evaluate Plum Island in the same manner as the other sites.

The NBAF Plum Island Site Alternative Report is intended to provide an informed, unbiased presentation of the qualities of Plum Island and the current capabilities of the PIADC facility against the EOI evaluation criteria to the extent feasible or applicable. As such, the data contained in it reflects aspects of Plum Island that support some of the EOI evaluation criteria, as well as PIADC constraints and limitations that do not support EOI evaluation criteria. The

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determination and decision of the strengths, weaknesses and deficiencies of the Plum Island site shall be performed by the NBAF Steering Committee and Decision Authority in accordance with the NBAF Decision Process Plan.

Evaluation Process Overview for the NBAF Plum Island Site Alternative

Using the same process described in my Final Selection Memorandum for the Site Selection for the Second Round Potential Sites for the NBAF, dated July 2007, DHS re-convened the evaluation panel of Federal employees, who were previously engaged in the earlier pre-EIS site selection process, to review the comprehensive NBAF Plum Island Site Alternative Report.

The criteria committees were reconvened in August 2008 and followed the evaluation process schedule shown below for the NBAF Plum Island Site Alternative Report.

NBAF Plum Island Site Alternative Report Evaluation Schedule	Dates
Delivery of PIADC Site Alternative Report for Review	8/15/08
Individual review of the Plum Island Site Alternative Report	8/15/08 to 8/27/08
Consensus review and rating by 2nd Round Site Selection Committees	8/27/08 to 9/3/08
Combined Consensus Review for all Committees	9/29/08
Compile Reviewer Comments and Ratings	9/3/08 to 9/5/08
Provide 2nd Round Committee Reviewer Comments and Ratings to "Decision" Steering Committee for Evaluation	9/04/08
Decision Steering Committee reviews Plum Island Site Evaluation data	9/05/08

Upon completion of the decision process committees evaluation of the criteria committees' scoring, the Plum Island Site Alternative ratings were officially included as part of this addendum to the Final Selection Memorandum for the Site Selection for the Second Round Potential Sites for the NBAF, dated July 2007.

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