

Baker, DVM, William

Page 1 of 1

MD0018

William D. Baker, DVM

[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

7-31-08

Re: NBAF Environmental Impact Statement

Dear Mr. Johnson,

1 | 24.1

I am a veterinarian in Grant County, [Redacted]. Our economy is based on the sale of beef cattle. In an effort to minimize the risk to our industry, we encourage you to keep the NBAF at Plum Island. We 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 NBAF at Plum Island. The United States cannot afford to compromise it's agricultural base.

Sincerely,

William D. Baker DVM

[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.

**Baldwin, Jim****Page 1 of 1****WD0660**

**From:** Jim Baldwin [jbaldwin@hicks-ashby.com]  
**Sent:** Friday, August 22, 2008 5:06 PM  
**To:** NBAFProgramManager  
**Subject:** National Bio & Agro Defense Facility (NBAF)  
**Importance:** High

1|24.4 | Please accept this email as a concerned citizen and business owner from the state of Kansas regarding the future location of the National Bio & Agro Defense Facility (NBAF). Based on the criteria being used it seems obvious that Kansas and specifically Manhattan, KS is the best location for the new NBAF. Why Manhattan, KS?

- 2|8.4 |
1. Major Agri – university in Manhattan
  2. Major military installation less than 20 miles from NBAF
  3. Proximity to Kansas City and St. Joseph Missouri which has headquarters of over 50% of the of animal science and health firms in the country
  4. Only 1.5 hours from University of Kansas main campus – which also provides animal science and health services
  - 3|21.4 | 5. Center of the country provides a natural protection the coasts and borders do not

Please feel free to contact me if you have any questions.

JIM BALDWIN, President  
Hicks-Ashby Co.  
10618 Summit  
Lenexa, KS 66215  
(913)469-5411 Ext. 317

National Bio and Agro-Defense Facility

Comment No: 1                      Issue Code: 24.4

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

Comment No: 2                      Issue Code: 8.4


DHS notes the information provided by the commentor. DHS has identified its Preferred Alternative in Section 2.6 in accordance with Council on Environmental Quality regulations (40 CFR 1502.14(e)) for implementing NEPA. The Preferred Alternative is one that an agency believes would best fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors. Several factors will affect the decision on whether or not the NBAF is built, and, if so, where. The NBAF EIS itself will not be the sole deciding factor. The decision will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment. The DHS Under Secretary for Science and Technology Jay M. Cohen, with other department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published.

Comment No: 3                      Issue Code: 21.4

DHS acknowledges the commentor's support for the Manhattan Kansas Site.

Barbour, PE, Deborah

Page 1 of 2



STATE OF NORTH CAROLINA  
DEPARTMENT OF TRANSPORTATION

August 26, 2008

MICHAEL F. EASLEY  
GOVERNOR

LYNDO TIPPETT  
SECRETARY

MD0125

Mr. James V. Johnson  
US Department of Homeland Security  
Mail Stop #2100  
245 Murray Lane, SW, Building 410  
Washington, DC 20528

Dear Mr. Johnson:

Thank you for the opportunity to comment on the National Bio and Agro-Defense Facility Draft Environmental Impact Statement (NBAF DEIS). Our comments pertain to the Umstead Research Farm Site (5), in Butner, North Carolina.

Mr. David Smith, of my staff, left a voice message on your comment line on August 25, 2008. This is a follow-up to provide our written comments.

Section 3.11.7.3.1: Under Operation Consequences, Highways and Roads (first paragraph)

1| 17.3 The planned roadway improvements mentioned in the document are from the Granville County Comprehensive Transportation Plan. At the current time no funding has been identified for these improvements and the North Carolina Department of Transportation (NCDOT) has no schedule for this work to be done.

As mentioned in the document, it is likely that turn lanes will be needed along Range Road at the entrance to the site. Also, it will be important for the driveway entrance to the site to be located along Range Road where adequate sight distance can be obtained. Range Road in this area is approximately 20 feet in width so widening and strengthening of the pavement should be investigated to determine if improvements are needed to accommodate construction traffic as well as NBAF traffic.

Also, depending upon projected traffic volumes, turn lanes may be needed at the intersection of SR 1004 (Old Oxford Highway/Old NC 75) and SR 1121 (Range Road). The daily truck traffic is not mentioned in this section of the document so it is possible that additional roadway improvements may be needed. Since there was little detail regarding traffic flow, truck traffic, etc. in the document, the NCDOT reserves the right to require additional improvements if determined necessary as the process moves forward. Also, any impacts that would occur due to the necessary roadway

MAILING ADDRESS: NC DEPARTMENT OF TRANSPORTATION  
PRECONSTRUCTION SECTION  
1541 MAIL SERVICE CENTER  
RALEIGH NC 27699-1541

TELEPHONE: 919-733-9425  
FAX: 919-733-9428

LOCATION:  
TRANSPORTATION BUILDING  
1 SOUTH WILMINGTON STREET  
RALEIGH NC

WEBSITE: [WWW.DOT.STATE.NC.US](http://WWW.DOT.STATE.NC.US)

Comment No: 1 Issue Code: 17.3

DHS notes the commenter's information regarding the roads adjacent to the Umstead Research Farm site. The discussion of existing road conditions and potential effects to traffic and transportation from the construction and operation of the NBAF at the Umstead Research Farm Site, as located in Section 3.11.7 of the NBAF EIS, has been revised to incorporate the provided data.

Barbour, PE, Deborah

Page 2 of 2

MD0125

Mr. James V. Johnson  
Page 2  
August 26, 2008

1 cont. | 17.3

improvements and driveway entrance to the site should be addressed within your final environmental document.

Within paragraph 2 it is noted that "The 2006 ADT for Range Road (SR 1121) and Old Route 75 were reported by the North Carolina Department of Transportation (NCDOT) as 2.0 and 2.2 vehicles per day, respectively (NCDOT 2006). The Umstead Research Farm NBAF is projected to impact the transportation infrastructure in the identified transportation corridors by the addition of 350 new employees making approximately 1,000 trips per day. This impact would increase the average daily traffic volume on both Range Road and Old Route 75 by approximately 476%."

There is an error in the number of vehicles listed on Range Road and Old Route 75. The 2 and 2.2 vehicles per day appear to represent mileage of segments of the road and not the Average Daily Traffic. Our 2007 information regarding average daily traffic along Old NC 75 (SR 1004) is 6100 vehicles per day west of Veasey Road (SR 1121). We do not have traffic counts readily available for Range Road. For more information regarding traffic counts, please contact Mr. Kent Taylor, PE, State Traffic Survey Engineer at 919-212-4550 or [ktaylor@ncdot.gov](mailto:ktaylor@ncdot.gov). Also, since the traffic counts along the roadways are higher than the numbers listed in the document, the percentage of increase of average daily traffic would not be as high as 476%.

Thanks again for providing us a copy of the Draft EIS. If you have any questions regarding these comments, please contact me at 919-733-9425 or [dbarbour@ncdot.gov](mailto:dbarbour@ncdot.gov).

Sincerely,



Deborah M. Barbour, PE  
Director of Preconstruction

DMB

cc: Lyndo Tippet, Secretary  
W. F. Rosser, PE, State Highway Administrator  
Wally Bowman, PE, Division Engineer  
Kent Taylor, PE, State Traffic Survey Engineer  
David Smith, PE, Preconstruction Staff Engineer

Barclay, R.

Page 1 of 2

MD0032

GA  
August 5, 2008

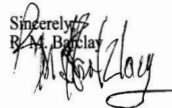
Dr. James V. Johnson, Dir.  
DHSST - NBAF  
Mail stop #2100  
245 Murray Ln. SW, Building # 410  
Washington, D C 20528

Dear Dr. Johnson:

1| 25.2 | Most persons in the Athens area are opposed to the locating of NBAF here. I make this state-  
ment out of fear you might think that the University of Georgia and Mayor of Athens are  
2| 12.2 | representing area citizens in inviting DHS to come. The University has repeatedly  
3| 21.2 | misrepresented facts about water consumption, size, danger, and impact. The integrity of  
the University is at stake in a lawsuit in which its "scientists" are accused of knowingly  
using incorrect data to advise farmers to use sludge that has resulted in hundreds of dead  
cattle.

The mayor invited you here without assessing the agreement of her own commission, much  
less the citizens of Athens and other affected community. There are chambers of commerce  
business persons who are so worried about the economy that they would welcome a franchise  
from the devil himself.

1 cont. | 25.2 | The majority of our people, I sincerely believe, feel disenfranchised by the politicians they  
voted in for representation. It has been noted that the governmental and academic leaders  
in other states have listened to their voters and asked you not to come. If the leaders here  
mislead you into thinking that they have our support, the next election would likely preclude  
the expensive infrastructure NBAF would need. Frankly, you would come here at peril for  
much local support.

Sincerely,  
R. A. Barclay  


Comment No: 1                      Issue Code: 25.2

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

Comment No: 2                      Issue Code: 12.2

DHS notes the commentor's water consumption concerns. As described in Section 3.7.3.3.1 of the  
NBAF EIS, the South Milledge Avenue Site alternative 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  
annual potable water usage is comparable to 228 residential homes' annual potable water usage.

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

Comment No: 3                      Issue Code: 21.2

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, tollfree 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.

Regarding the substantive issues raised by the commentor, DHS notes that issues regarding water  
resources are provided in Section 3.3 and 3.7 of the NBAF EIS; facility size information, in Section  
2.2.1 of the NBAF EIS; potential dangers, in Section 3.14 and Appendix E and in a separate Threat  
Risk Analysis that will be considered in making any decision relative to if and where the NBAF will be  
built; and finally, information on the projected impacts from the construction and operation of the  
proposed NBAF are provided throughout Chapter 3 of the NBAF EIS.

Barclay, R.

Page 2 of 2

SUIT CLAIMS UGA SCIENTISTS USED FALSE DATA

MD0032

## Judge urges arbitration in lawsuit against UGA

By Lee Shearer  
lee.shearer@onlineathens.com

A federal judge ordered the parties to consider arbitration in a lawsuit claiming that University of Georgia scientists used false data to show that applying sewage sludge would not pose a threat to dairy farmers' herds.

Former EPA scientist David Lewis and two Augusta dairy farmers filed the suit in U.S. District Court against UGA, the EPA, the UGA Research Foundation, former UGA Research Foundation head Joe Key and several UGA scientists and EPA officials.

UGA could be ordered to return EPA grants and pay financial penalties if Lewis' claims stand up in federal court for Georgia's Middle District.

But, before the case goes to trial, the parties should try arbitration, according to a letter issued by U.S. District Court Judge Clay Land this week.

However, the parties in the lawsuit do not have to use the arbitration process, which can happen in private instead of in public, and several scientists and EPA administrators said in court documents filed Friday that they will refuse arbitration.

One federal judge already has ruled in favor of one of the dairy farming families in a related lawsuit against the city of Augusta.

The family said their cows died by the hundreds when sludge from an Augusta sewage plant was spread on their dairy pastures.

U.S. Southern District of Georgia Judge Anthony Alaimo ruled in February that the sludge contained dangerous pollutants such as chlordane, thallium and arsenic.

The city of Augusta used "fudged" data to show the sludge was safe, Alaimo said.

According to Lewis' lawsuit, UGA scientists used that same flawed data in research that showed the city's application of sewage

sludge to the dairy pastures was safe and was within federal limits for the amount of heavy metals and other toxins that can be applied to land.

Lewis, a former EPA scientist, claims the research was a key element of a campaign by EPA administrators who wanted to justify the safety of a federal policy that encourages farmers to spread sewage sludge on their fields. He also asserts that the research was used to discredit the Augusta dairy farmers, who said their cows were dying after eating grass from the sludge-treated fields.

Lewis said the EPA administrators also were trying to discredit his own research that questioned whether farms could safely use sewage sludge, the semi-solid material that remains after wastewater is treated in municipal wastewater plants.

According to Lewis' research, EPA safety standards for sludge may be too lax to protect human health.

Barger, Deena

Page 1 of 2

Deena D. Barger  
 [REDACTED]  
 [REDACTED], Kansas  
 [REDACTED]

July 20, 08  
 MD0041

REF: Manhattan Campus Site

Dear Mr. Johnson,  
 I have been a resident of [REDACTED] Kansas for 48 years. [REDACTED] is known for having many trees, birds, rabbits and Squirrels, that love to run and fly free, including the K-state campus. [REDACTED] has a lot of fishing and Park resorts in our area.

<sup>11</sup>25.4 I believe the National Bio and Agro Defense facility would be a great danger to our community. Not only for the wildlife, but also for house pets and young children. On the other hand the purpose of the facility is very much an importance.

<sup>21</sup>5.4 If having the facility in my community, I would pray that there would be the most cautious of safety by putting

Comment No: 1

Issue Code: 25.4

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

Comment No: 2

Issue Code: 5.4

DHS notes the commentor's concern. Portions of the NBAF may be constructed underground and will be determined during the final design phase. However, constructing the entire facility underground was considered but deemed not practical and eliminated as an alternative as described in Section 2.4.3 of the NBAF EIS.

Barger, Deena

Page 2 of 2

MD0041

underground, under concrete with  
softy passes of the most  
strict order of personal.

Please keep me informed on  
the results and the decisions  
to be made.

Sincerely,  
Deena W. Barger



Barkley, Julie

Page 1 of 1

WD0060

**From:** Julie Barkley [REDACTED]  
**Sent:** Sunday, July 13, 2008 8:40 PM  
**To:** NBAFProgramManager  
**Subject:** No to NBAF- Athens, GA

To whom this may concern:

1|25.2 | Please re-consider relocating the NBAF to Athens, Georgia. Not only  
 2|12.2 | are there so many risks to our citizens but it also impacts our dire  
 water supply. Our communities, both Athens-Clarke County and Oconee  
 County, have made tremendous strides and efforts to cut our water  
 consumption over the past 9 months in order to have the necessary  
 water for daily living. In this day and age when our entire nation  
 is suffering from economical downfall, weather related tragedies and  
 not to mention the unbelievable cost of oil we need to preserve what  
 mother nature has given us, not abuse and destroy it.

1 cont.|25.2 | Athens is a vibrant, family-oriented, and close knit community. A  
 Biohazard Lab does not fit into our community no matter how you look  
 at it or how much money is offered to use this land. Please consider  
 that this lab is in very close proximity to thousands of citizens of  
 all ages and walks of life. It is near many schools, churches,  
 businesses and farm land. All of these will be affected by this lab  
 in more negative than positive ways.

I am against this lab and hope you will strongly consider other  
 sights for the placement of this lab and remove Athens, GA from this  
 list altogether.

Sincerely,

Julie Barkley  
 Concerned citizen, [REDACTED] GA

You can prevent NBAF from forever changing the face of Athens, and  
 the time to do so is now. The DEIS says some of the original  
 applicants were eliminated because of "weaknesses or deficiencies"  
 including "insufficient community support."

Comment No: 1                      Issue Code: 25.2

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

Comment No: 2                      Issue Code: 12.2

DHS notes the commentor's drought concerns 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. NBAF's potential annual potable water usage is comparable to 228 residential homes' annual potable water usage.

**Barnes, Gene**

**Page 1 of 1**

WD0148

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**From:** [REDACTED] on behalf of Gene Barnes [REDACTED]  
**Sent:** Friday, August 01, 2008 9:26 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Athens, Georgia

Dear NBAF Program Manager,

1|25.2 | The geographic and demographic reality surrounding the proposed NBAF site in Athens should have kept it from ever being considered in the first place. This is not a good place, much less the best place, to locate the facility and I remain vigorously opposed.

Sincerely  
Gene Barnes

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

Barnes, Jeffrey

Page 1 of 1

WD0112

**From:** Barnes, Jeffrey Brian [REDACTED]  
**Sent:** Sunday, July 27, 2008 8:33 PM  
**To:** NBAFProgramManager  
**Subject:** New NBAF

- 1) 24.1 I've read and watched a little about the new NBAF building. With the chance of an accident still being a possibility, I believe the most secure location is still Plum Island. The proximity of herd animals and those who work with them makes Manhattan, KS a very poor choice for the NBAF location. As do several of the other locations. If the Plum Island incident where they had to turn the ferry around had happened at Manhattan, it would have been too late and very possibly catastrophic. I realize the economic value of the new building wherever it is built. But the public safety has to be the number one priority and the safest place to build the new facility is at Plum Island. Everything else is secondary to that.
- 2) 25.4
- 3) 19.0

Comment No: 1                      Issue Code: 24.1

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative based on risks to residents and livestock. 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 in populated areas such as Manhattan. An example is the Centers for Disease Control and Prevention located in downtown Atlanta, Georgia.

Comment No: 2                      Issue Code: 25.4

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

Comment No: 3                      Issue Code: 19.0

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

**Barnette, Brian**

**Page 1 of 1**

PD0308

August 25, 2008

1| 24.1

This is Brian Barnette of [REDACTED] Kansas. I believe that the NBAF facility should remain at Plum Island in New York for the safety of the Nation, and agriculture industry, and individual safety throughout the Nation.

Thank you.

Comment No: 1      Issue Code: 24.1

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative.

**Barr, Bill**

**Page 1 of 1**

PD0107

August 19, 2008

Yes,

1|24.4 My name is Bill Barr and I am with Bill Barr and Company in ██████████ Kansas and I would like to make some comments about the National Bio and Agro Defense facility and why it should be located in the State of Kansas and specifically in Manhattan, Kansas.

Kansas State...in the State of Kansas, Kansas State University, in the State of Kansas, has the infrastructure and personnel necessary to man this type of facility. Kansas State has already invested more than 54 million dollars in their bio security research institute. The Kansas City area is home of the Kansas City animal health corridor which has over 120 animal health organizations located within a 200 mile radius. The FBI has a well-staffed agro bio terrorism office in Kansas City and they work with the Heart of America Joint Terrorism Task Force. This group sponsors the international symposium on agro terrorism that is held in the Kansas City area each year.

I think that these are compelling reasons why something as important as the National Bio and Agro Defense facility should be located in the heartland of the United States.

Thank you for the opportunity to express my comments.

Comment No: 1

Issue Code: 24.4

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

**Barrentine, Penny**

**Page 1 of 1**

WD0722

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**From:** Penny Barrentine [REDACTED]  
**Sent:** Monday, August 25, 2008 10:08 AM  
**To:** [REDACTED]  
**Subject:** Mississippi - Your best choice!

1|24.5

As a citizen of Mississippi, I believe that by selecting Mississippi for the Bio facility will be a great choice. It will provide new opportunities for us and lead us into the future. We are excited to be a finalist in your site selection process and hope that Mississippi is your choice!!

Thanks!  
Penny Barrentine

Comment No: 1

Issue Code: 24.5

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

Barrett, Diane

Page 1 of 1

WD0032

**From:** Diane Barrett [REDACTED]  
**Sent:** Wednesday, July 02, 2008 11:36 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF

1| 12.2 | These is a dumb idea. We are in a drought and need water. What would  
 2| 21.2 | happen if one of the viruses got out. GA as a to miny prodloms as it  
 is. By Michael Edward Rives [REDACTED]

Comment No: 1                      Issue Code: 12.2

DHS notes the commentor's concern regarding the proposed water use and existing water supply. Section 3.3 includes an evaluation of infrastructure including potable water, and Section 3.7 includes an evaluation of water resources. As stated in Section 3.3.3.3.1, there is adequate capacity of 43,000,000 gallons per year, but some infrastructure improvements would be required. DHS acknowledges that drought conditions exist in the region, but the NBAF would only account for a minor increase in water use compared to recent development trends.

Comment No: 2                      Issue Code: 21.2

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

**Barrett, Diane**

**Page 1 of 1**

WD0033

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**From:** Diane Barret [REDACTED]  
**Sent:** Wednesday, July 02, 2008 11:28 AM  
**To:** NBAFProgramManager  
**Subject:** NABF in Athens

1|25.2 I am writing to protest the building of NBAF in Athens, GA. I believe it would have an extremely negative impact on our community and in the state. Diane Barret, concerned citizen

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



## Barrow, Ruth

Page 1 of 1

WD0221

**From:** Ruth Barrow [REDACTED]  
**Sent:** Sunday, August 10, 2008 9:06 AM  
**To:** NBAFProgramManager  
**Subject:** NBAF Athens

1|5.1 | I still do not have a clear answer as to why NBAF cannot stay on Plum Island. Yes, I understand a new facility must be built but all of the employees and support personnel are in the area. If you come down here, there will be huge relocating expenses of personnel and ancillary equipment.

2|25.2; | Why come to an area where the facility is not wanted? Many of us do  
 3|21.2 | not want the facility and the inherent danger it poses to people and wildlife and our eco system should there be an incident .... and there will be at sometime.

2 cont. | Please, DO NOT choose to come to Athens, Georgia.  
 25.2 |

Sincerely,  
 Ruth Barrow  
 [REDACTED]  
 [REDACTED] Georgia [REDACTED]

Comment No: 1                      Issue Code: 5.1

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

Comment No: 2                      Issue Code: 25.2

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

Comment No: 3                      Issue Code: 21.2

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

**Basford, Janice**

**Page 1 of 1**

PD0115

August 20, 2008

1/25.4 | Do not build the lab in Manhattan, Kansas. Please.

This is Janice Basford of [REDACTED] Kansas.


Comment No: 1

Issue Code: 25.4

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

Bass, Willie and Linda

Page 1 of 1



NCD003

## National Bio and Agro-Defense Facility Draft Environmental Impact Statement Comment Form

**Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.**

Name: Willie & Linda Bass

Title: NC Retiree

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: NC Zip Code: \_\_\_\_\_

Comments:

*Due to Our Being here in [redacted] for past 42 years raising children & caring for the elderly elderly. We are strongly against the Lab to be placed here due to the water that's now difficult to keep up to standard for drinking. Water Bill has double each month & you really don't feel comfortable giving it as tap drink when you don't want to drink it yourself. Thus all the institutions here would be in jeopardy if there was an evacuation.*

(Continued on back for your convenience)

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: 12.3  
 DHS notes the commentor's watershed concern. The NBAF EIS Section 3.13.8 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 3                      Issue Code: 19.3  
 DHS notes the commentor's concerns regarding an accident and subsequent potential evacuation. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. The chances of an accidental release are low. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation in response to an accident is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Bast, Nancy

Page 1 of 1

WD0397

From: [REDACTED]  
 Sent: Wednesday, August 20, 2008 9:48 AM  
 To: NBAFProgramManager  
 Subject: NBAF

1|25.2; I am totally OPPOSED to locating NBAF at the Milledge Avenue site in Athens, GA. While I do agree that  
 2|5.0; there is a vital need for this facility, I feel that the Athens site would be one of the worst places for it. I do  
 3|6.2; not want to see the pristine and pastoral nature of the Milledge Avenue site spoiled by construction of this  
 4|12.2; facility. The proposed NBAF site is adjacent to our lovely state Botanical Gardens. What a travesty! Our  
 2 cont.| community is in the midst of a severe drought. Athenians have been urged to conserve water in every  
 5.0; conceivable way, and I believe the NBAF would be a huge strain on our water resources.  
 1 cont.| The best place for NBAF is off-shore. If not on Plum Island, then why not another island?  
 25.2| If the citizens of Athens-Clarke county had been consulted about this issue, I am certain the answer  
 would have been a resounding NO! from the majority of the residents.

Nancy Bast  
 [REDACTED] GA

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 5.0

DHS held a competitive process to select potential sites for the proposed NBAF as described in Section 2.3.1 of the NBAF EIS. A team of federal employees representing multi-department component offices and multi-governmental agencies (i.e., DHS, U.S. Department of Agriculture, and Department of Health and Human Services) reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the EIS as alternatives for the proposed NBAF.

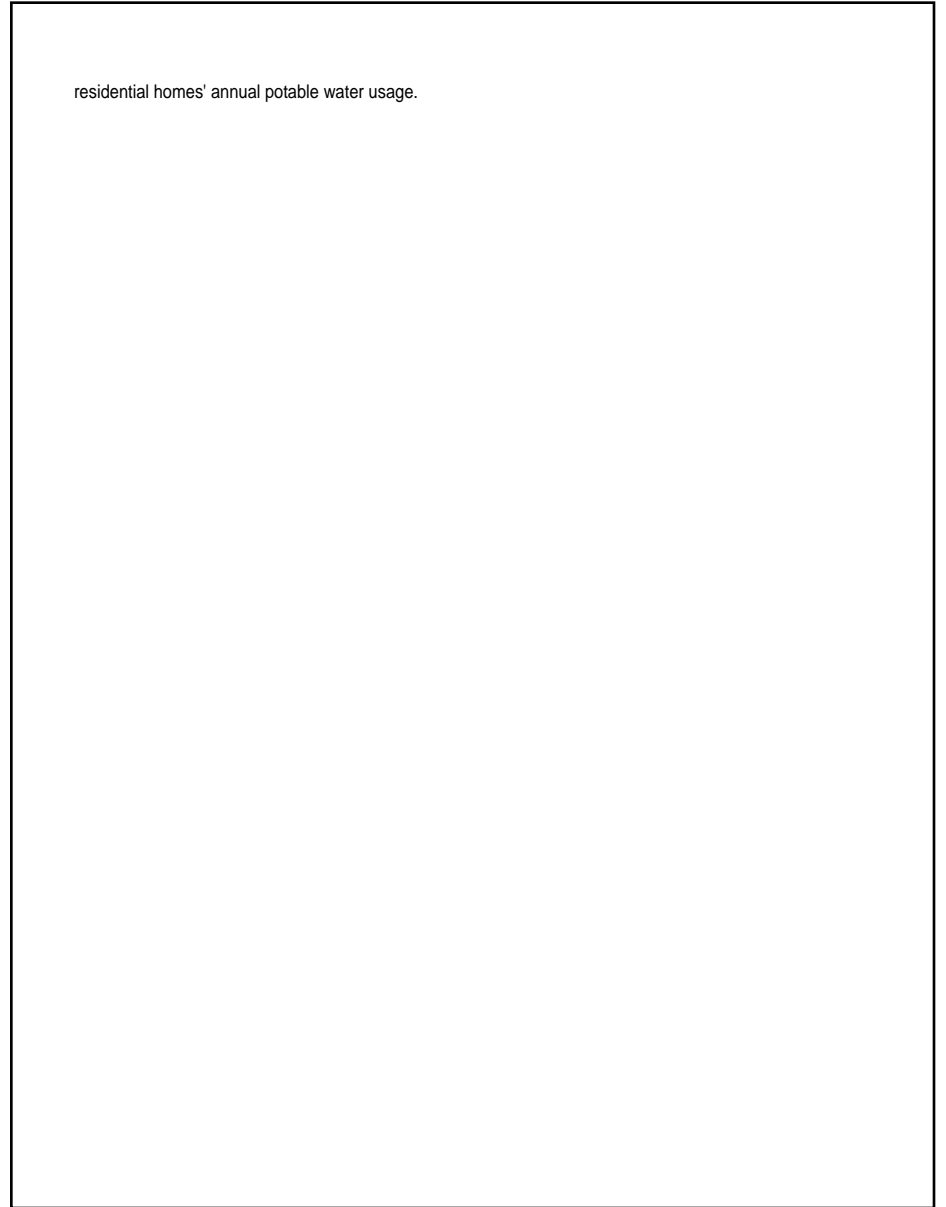
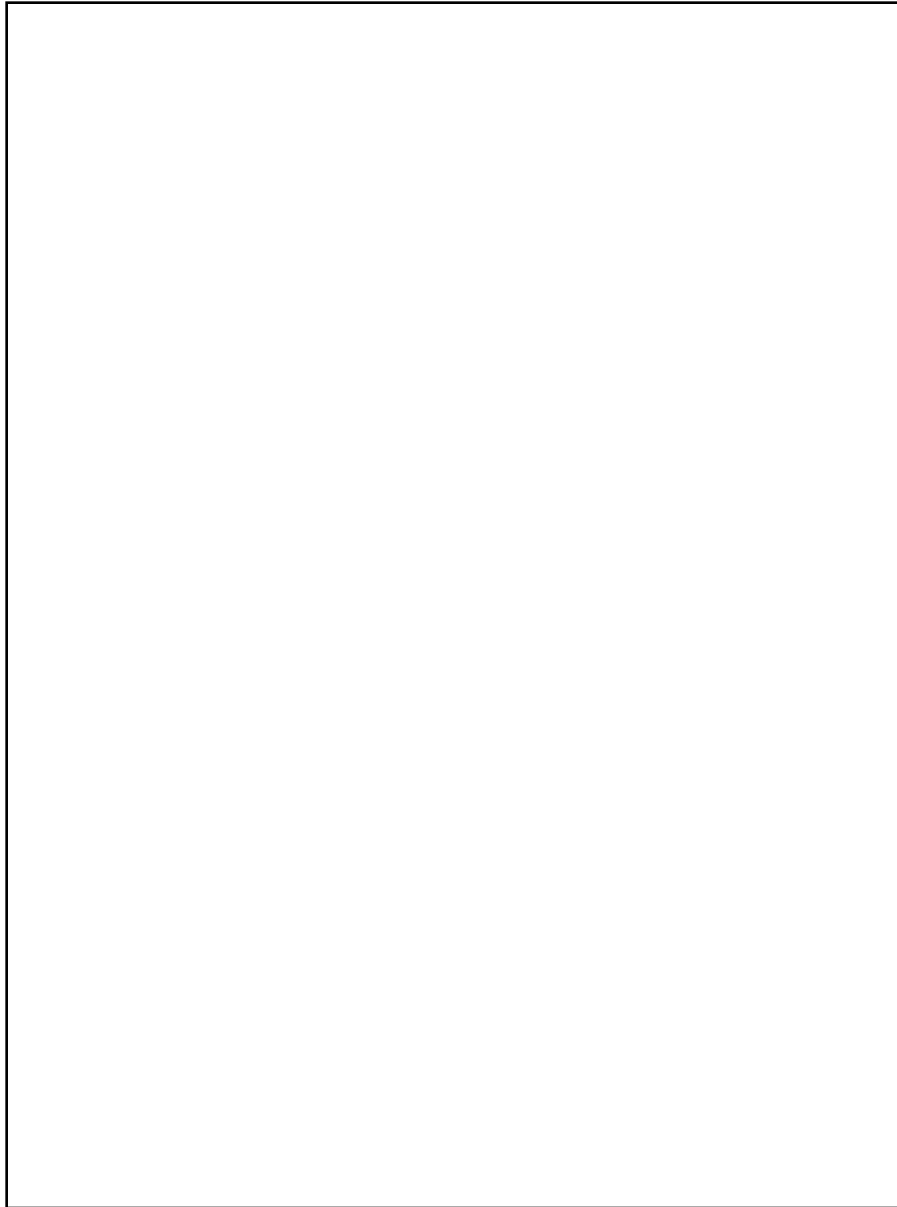
Comment No: 3 Issue Code: 6.2

DHS notes the commentor's concern regarding development of the South Milledge Avenue Site which is described in Section 3.2.3. A change in land use would occur; however, current zoning regulations allow for this type of development. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Chapter 3, Section 3.2.3. DHS and USDA would ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and policies. The visual effects of the NBAF at the South Milledge Avenue Site are also described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area.

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, 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: 4 Issue Code: 12.2


DHS notes the commentor's drought concerns and DHS acknowledges regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative 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 annual potable water usage is comparable to 228



Bates, Alan

Page 1 of 2

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FD0066



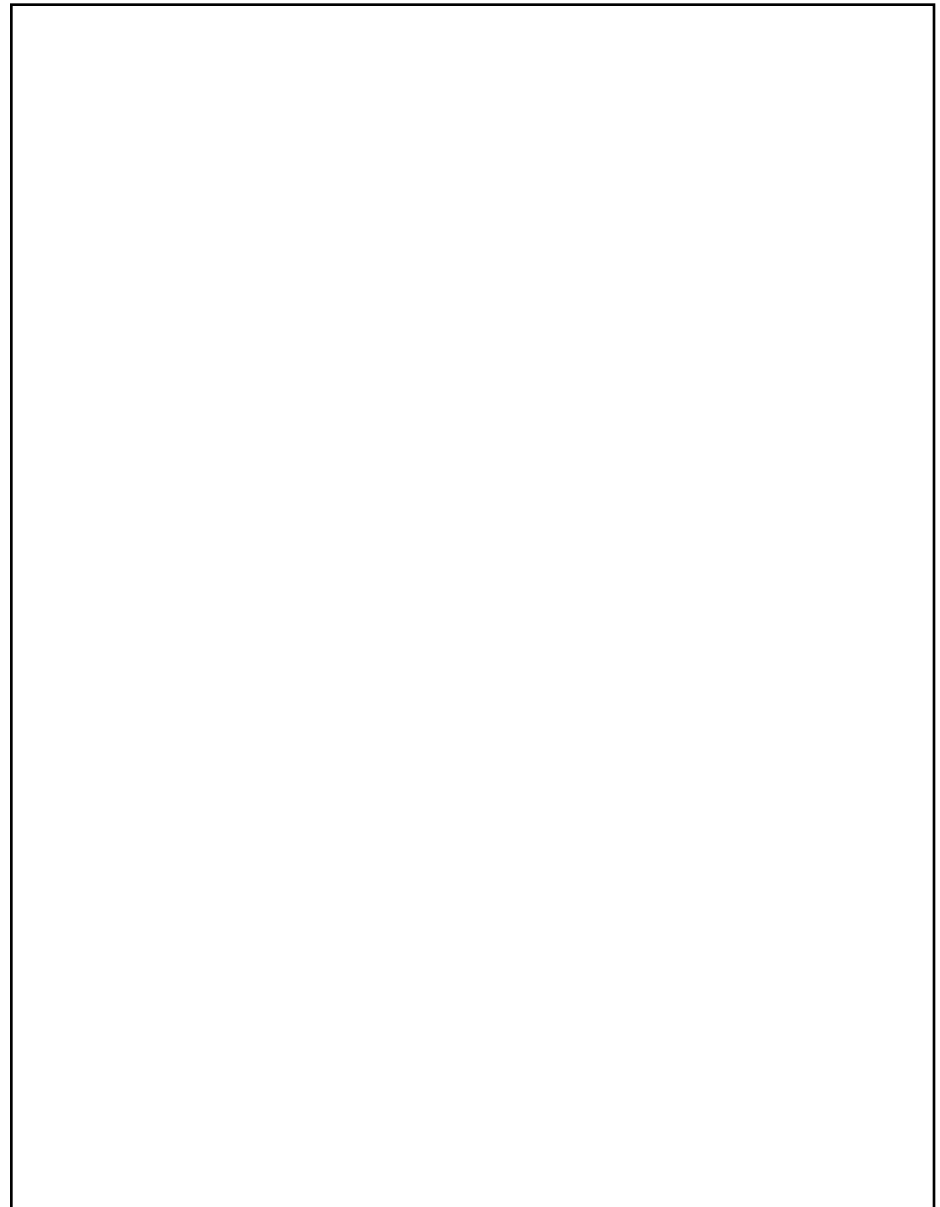
**CHOCTAW COUNTY  
ECONOMIC DEVELOPMENT FOUNDATION**  
115 EAST QUINN • P.O. BOX 737 • ACKERMAN, MS 39735 • 662-285-0770 • FAX 662-285-2440

# Fax

To: James V. Johnson Fax: 1-866-508-6223  
From: Alan Bates  
Date: 8/25/08  
Re: NABF location  
Pages (including cover sheet): 2  
Comments:  
Please see letter following this page  
\_\_\_\_\_  
\_\_\_\_\_

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Bates, Alan

Page 2 of 2

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PAGE 02/02

FD0066



**CHOCTAW COUNTY**  
**ECONOMIC DEVELOPMENT FOUNDATION**

115 EAST QUINN • P.O. BOX 737 • ACKERMAN, MS 39735 • 662-285-3778 • FAX 662-285-2440

August 25, 2008

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:

1| 24.5

I am writing in support of locating the proposed National and Bio and Agro-Defense Facility in Flora, Mississippi. As a resident of central Mississippi, I know firsthand of the wonderful quality of life in the area, and know that employees relocating to the area will be made welcome, and will quickly embrace the southern hospitality for which we are known.

Mississippi is blessed with a knowledgeable labor force with a good work ethic, a product of our fine education institutions. This facility will help keep many of our brightest and best young people in Mississippi.

Again, I wholeheartedly endorse and support the location of the proposed National and Bio and Agro-Defense Facility in Flora, Mississippi. Thank you for your consideration.

Sincerely,

Alan Bates  
Executive Director

[www.choctawcounty.org](http://www.choctawcounty.org)

Comment No: 1

Issue Code: 24.5

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

Batey, Sandra

Page 1 of 1

WD0721

**From:** sandra.batey [REDACTED]  
**Sent:** Monday, August 25, 2008 12:50 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF

Mr. Cohen,

1|25.0 I am writing to ask you to leave the Bio lab at Plum Island. There are many risks to the people  
 2|21.0 of the U.S A. You can NOT guarantee our safety against terrorist, human  
 error, sabotage, mechanical failure or mother nature. The lab should be left on the island where it  
 will be away from the people and animals. If you feel the emergency response teams can't get  
 there fast enough then build them a station on the island.

3|15.3 You say we'll get jobs, but the jobs will be filled by people from out of state. We the tax payor  
 will have to foot the bill for the infrastructure. NC is one of the largest suppliers of pork, turkey  
 in the US, why would you want to jeopardize our food supply? They will dump the waste water  
 4|12.3 into our drinking water, are you willing to come live here and drink that water? You have NOT  
 thought this through. Main land USA is NOT the place for this lab.

Sincerely,  
Sandra Batey

[REDACTED] NC [REDACTED]

Comment No: 1      Issue Code: 25.0

DHS notes the commentor's opposition to the five mainland site alternatives and support for keeping the existing facility on Plum Island.

Comment No: 2      Issue Code: 21.0

DHS notes the commentor's statement regarding safety guarantees. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. 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. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

Comment No: 3      Issue Code: 15.3

DHS notes the commentor's concerns. In addition to creating temporary construction jobs, the proposed action is expected to directly and indirectly support permanent jobs. A portion of the permanent jobs at the NBAF will be filled by the local labor force. Furthermore, 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. The number of short-term and permanent jobs that would be directly and indirectly created by the construction and operations of the NBAF at the Umstead Farm Research Site are discussed in Chapter 3 of Section 3.10.7 of the NBAF EIS. Due to the small percentage of the overall population growth that would be attributed to the facility, the population increase associated with the NBAF, which is discussed in Section 3.10.7 of the NBAF EIS, would have a negligible effect on the infrastructure. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the NBAF EIS. The risks were determined to be low for all site alternatives.

Comment No: 4      Issue Code: 12.3

DHS notes the commentor's watershed concern. The NBAF EIS Section 3.13.8 describes the Waste Management processes that would be used to control and dispose of NBAF's potential liquid and solid waste. The NBAF EIS Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.



Batey, Sandra

Page 1 of 1

MD0068

**Name and complete address:**

Sandra Batey

[REDACTED]

**Comment:**

8-2408

Dear Mr. Johnson,

I am writing to ask you NOT to  
 1 bring NBAF to NC or main land USA.  
 2 You can NOT guarantee the safety of  
 the public or the food supply from  
 terrorists, human error, mother nature or  
 mechanical failure. Plum Island has  
 had many problems and as it has  
 been off shore disasters have been  
 avoided. If you need emergency  
 response there quicker then you  
 should build it on the Island. You  
 say the lab there is old, well you  
 3 have over 800 acres, so rebuild  
 it there.

Thank you  
 Sandra Batey  
 Sandra Batey

Comment No: 1Issue Code: 25.3

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

Comment No: 2Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives including the Umstead Research Farm Site Alternative. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 3Issue Code: 24.1

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative and support for the Plum Island Site Alternative.

Bauer, Kim

Page 1 of 1

WD0521

From: kim bauer [REDACTED]  
 Sent: Tuesday, August 05, 2008 4:26 PM  
 To: NBAFProgramManager  
 Subject: NO TO THE NBAF in NC

1) 25.3 Please do not locate the research lab in Butner, NC.

- 2) 19.3 • This is a research lab which studies animal and animal to human diseases- **which have no treatment and are deadly**
- 3) 18.3 • The research on large animals- which when infected, **will produce large amounts of infected waste (carcasses)**
- 4) 12.3 • This waste will be treated and **released to the South Granville water treatment facility and then into Falls Lake, our drinking water supply**
- 5) 21.3 • 4 other water reservoirs are within **5 miles of this site**
- Butner is home to more than 7,000 institutionalized people- **who cannot relocate or evacuate**

Thank you, Kim Bauer

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 the pathogens that would be studied in the NBAF. By definition and as identified in 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. It is because of the risks posed that the NBAF is needed in order to provide a modern, integrated high-containment facility to safely and effectively address the accidental or intentional introduction of animal diseases of high consequence into the United States.

Comment No: 3 Issue Code: 18.3

DHS notes the commentor's concern. Section 3.13.2.2 explains that a number of different technologies (compared in Table 3.13.2.2-4) including incineration, alkaline hydrolysis, and rendering are being considered for disposal of euthanized animal carcasses. As shown on the table, use of any of these technologies would result in non-infective residuals.

Comment No: 4 Issue Code: 12.3

DHS notes the commentor's concern. Section 3.13.8 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 5 Issue Code: 21.3

DHS notes the commentor's concerns regarding an accident and the impact to institutionalized populations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. Should a decision be made to build NBAF and upon site selection, site specific protocols would be developed, in coordination with local emergency response agencies, that would address special consideration populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

## Baugh, Joyce and Charles

Page 1 of 1

WD0552

**From:** Baugh [REDACTED]  
**Sent:** Sunday, August 24, 2008 7:53 PM  
**To:** NBAFProgramManager  
**Subject:** Athens, GA

To whom it may concern:

- 1| 25.2 | My husband and I are very much opposed to the NBAF lab being located in  
 2| 6.0, 3| 19.0 | Athens, GA. We are concerned about safety both animal and human. The  
 4| 12.2 | facility would be located near the Oconee River which flows through our  
 property downstream.
- 5| 6.2 | There are many farms with cattle, sheep and goats in the area. It makes no  
 sense to locate it in this environment.
- 7| 21.2 | The potential hazards far outweigh the economic benefit to the area. The  
 recent disclosure by the FBI of the source of anthrax used in the terror attacks  
 after 9/11 is a perfect example that these agents cannot be 100% contained.
- 8| 23.0 | What procedures do you use to ensure that a deranged scientist doesn't spread  
 these pathogens in our area?

Thank you, Joyce and Charles R. Baugh, [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: 6.0

Please see response to Comment No. 3.

Comment No: 3                      Issue Code: 19.0

DHS notes the commentor's concern about the risk to health and safety from the NBAF operation. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen. The NBAF would provide state-of-the-art biocontainment features and operating procedures to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Sections 3.8.9, 3.10.9, 3.14, and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from a accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 4                      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 stormwater management, erosion control, spill prevention, and waste management. Section 3.13.4 of the NBAF EIS 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: 21.2

DHS acknowledges the commentor's statement that safety at the NBAF is not guaranteed. DHS also notes that the risk of an accidental release of a pathogen from the NBAF is extremely low. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and

intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. 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. For example, as described in Section 2.2.2.1, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. The risk of an accidental release of a pathogen is extremely low. Oversight of NBAF operations, as described in Section 2.2.2.6, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

DHS notes the commentor's concern. A separate Threat and Risk Assessment (designated as For Official Use Only) was conducted to determine the level and type of threat for each site, and Section 3.14 and Appendix E evaluated the potential consequences from terrorist actions and other accident scenarios.

Comment No: 5                      Issue Code: 6.2

Please see response to Comment No. 3.

Comment No: 8                      Issue Code: 23.0

DHS notes commentor's concern that NBAF scientist undergo proper pre-employment screening and ongoing employee evaluation and training. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the Animal and Plant Health Inspection Service Institutional Animal Care and Use Committee. With regard to employee training, Section 2.2.2.1 of the NBAF EIS, discusses the requirement that all laboratory staff would receive pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics.

Baumert, J. D.

Page 1 of 1

MD0111

Mr. Johnson

August 18, 2008

Sir:

1|24.1

The decision to move the infectious animal disease research off Plum Island may, or may not, be justified. (Of course upgrading the existing facility might be the best solution.)

2|21.1

However moving it to the mainland instead of some other off-shore site seems almost moronic. Accidents happen in every human endeavor and then there is the prospect of creating a chernobyl target.

No doubt pork barrel politics plays a role here as with much of Washington's doings.

3|5.0

So move it if you must but keep it off the mainland for gods sake and ours also.

My thoughts —

Regards  
J.D. Baumert

Comment No: 1

Issue Code: 24.1

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

Comment No: 2

Issue Code: 21.1

DHS notes the commentator's concerns regarding the risk of a potential accident or terrorist event. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. As described in Chapter 3 and summarized in Section 2.5 of the NBAF EIS, the impacts of activities during normal operations at any of the six site alternatives would likely be minor. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. Appendix B to the NBAF EIS describes biocontainment lapses and laboratory acquired infections in the United States and world-wide. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. Section 3.14 of the NBAF EIS, addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The TRA is "For Official Use Only" and is not available for public review. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process. 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.

Comment No: 3

Issue Code: 5.0

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

Baxa, Fred

Page 1 of 1

PD0045

August 6, 2008

Hi,

This is Fred Baxa, Kansas, and I'd like to comment on putting that bio deal down here by Manhattan. You know there's several things that we have no control over. First of all, you know storms, tornados, you know they say, well it won't get out - can't happen. Well that's an understatement because it always does. There's just no possible way, and even when it's impossible, to stop something like that.

I can't see why you would want to jeopardize our cattle industry, as nice, and the best in the world, we got in this State of Kansas, with something like that.

To me that is total irrational to think that you want to put something like that and make our industry subject to that. You know I don't even agree with the Governor on a deal like that. I know we need jobs. I know it's a desperate time, but I just don't see any good thing to come out of it when you've got it right here where it can totally cause chaos and disaster.

I think you people need to think twice, maybe three times, before you do something like this. I'm 65 years old, but I can't see for the life of me why we would want to allow something that drastic, which is no way to control it from getting out.

You know it will happen, and I think that somebody needs to get a hold of it, and put a stop to it.

I appreciate your time and effort, but I think we need to say no.

Thank you.

Bye.

Comment No: 1      Issue Code: 21.4

DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period.

In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 2      Issue Code: 15.4

Chapter 3, Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Chapter 3, Section 3.10.9 and Appendix D. 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: 3      Issue Code: 21.4

DHS notes the commenter's concerns regarding the impact of an accident on the local population, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, The chances of an accidental release are low. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working,

among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Manhattan Campus Site, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 4

Issue Code: 25.4

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

Beal, Bob

Page 1 of 1

WD0398

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**From:** Bob Beal [REDACTED]  
**Sent:** Wednesday, August 20, 2008 9:56 AM  
**To:** NBAFProgramManager  
**Subject:** Locating in Athens, Ga.

Dear Decision maker!

There are a lot of reverse-thinking people living here that oppose your presence. However, many of us are opposite to their shallow thinking, selfish directives and anti-progress views. They have voiced against your presence. In light of forward perspective, advantages to our community and upward mobile

1|24.2 | advancement, you literally **MUST** locate in Athens-Clarke county, Ga.

Thanks for answering this prayer!

Blessings!

Bob Beal.

Comment No: 1      Issue Code: 24.2

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