


Cunningham, Hazel

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FD0011



## 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: Hazel Cunningham

Title: \_\_\_\_\_

Organization: U.S. Citizen / Flora Area Resident

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

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

Comments: I am opposed to the NBAF Lab being located in Flora, Mississippi. This is a lovely, rural area to live. The wildlife is plentiful, the domesticated animals are very important to our way of life including our pets who live in & out of our homes. In my opinion, it is absolute lunacy to even consider locating a bio-medical lab in a populated area. It is just not necessary! and is unacceptable to our quality of life and to ask us to pay for exposing us to this danger is the height of arrogance. I am concerned with the safety factor, leaks which create a hazard to animals (Continued on back for your convenience)

NATIONAL BIO AND AGRO-DEFENSE FACILITY  
Science and Technology Directorate, Office of National Laboratories

25  
25

1 | 25.5

2 | 5.0

3 | 19.5

4 | 21.5

Comment No: 1

Issue Code: 25.5

DHS notes the commentor's opposition to the Flora Industrial Park Site Alternative.

Comment No: 2

Issue Code: 5.0

As described in Section 2.3.1, DHS's site selection process including site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. 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 NBAF.

Comment No: 3

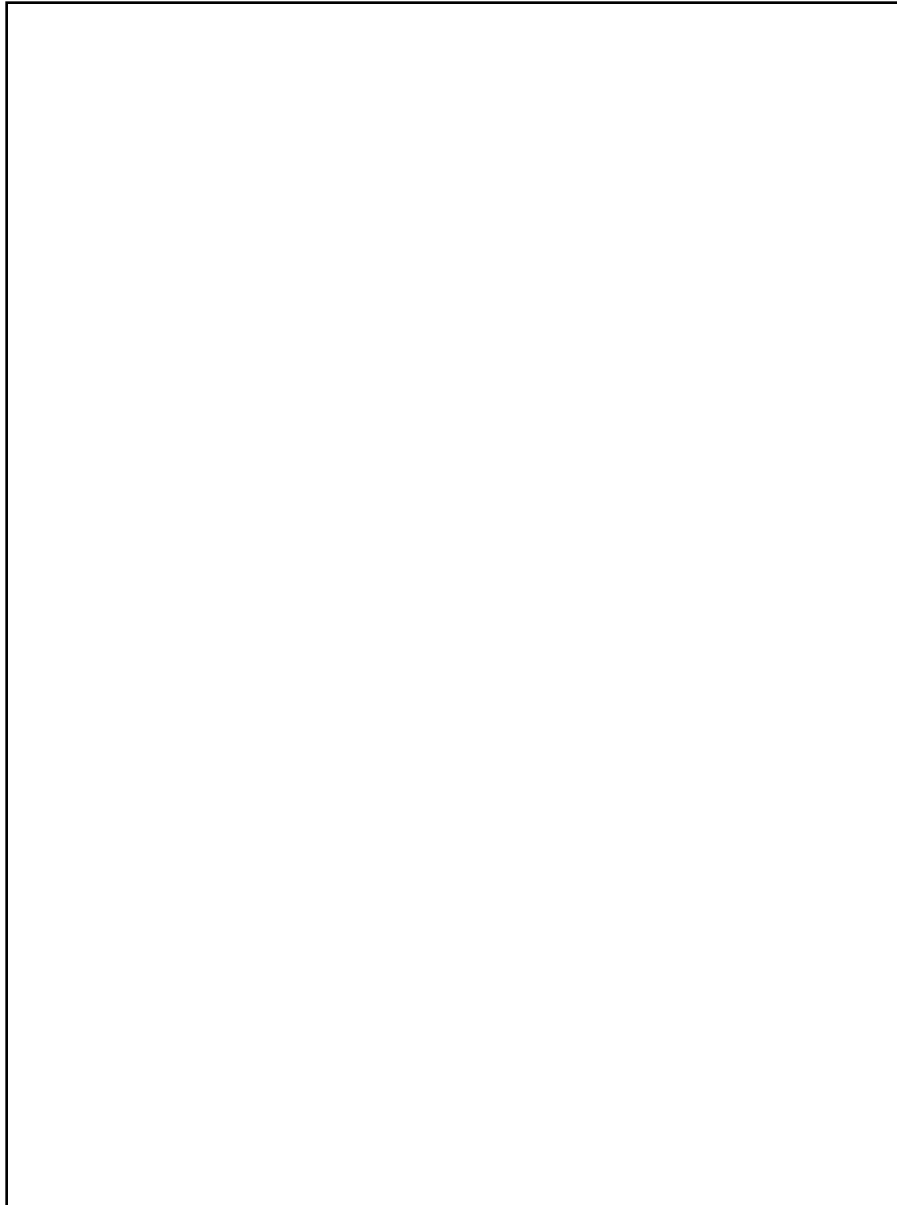
Issue Code: 19.5

DHS notes the commentor's concern. The risk of an accidental release of a pathogen 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, including external events such as a terrorist attack. Risks to human populations at each alternative site were evaluated and discussed in Section 3.14 (Health and Safety) and Appendix E of the NBAF EIS.

Comment No: 4

Issue Code: 21.5

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. 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. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in 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 APHS



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, 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.

Cunningham, Hazel

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FD0011

and humans. Nor do I condone  
the Chamber of horrors known as  
an Animal testing facility.

This Lab probably isn't necessary  
to defense, but if you persist, then  
renovate Plum Island since the  
wildlife has already been destroyed  
or locate it in the desert where  
wildlife is minimal.

I know asking these Govt. Agencies  
to use moral & ethical reasoning  
to place the facility in an isolated  
area or better yet in No Area  
is an exercise in futility, but I'm  
asking anyway. Please take Flora,  
MS off your List of placement considerations.

Thank You,  
Hazel CUNNINGHAM  
MISSISSIPPI

## THANK YOU FOR YOUR COMMENTS

Please return this form to the comment table. It may also be mailed or faxed as follows:

U.S. MAIL	TOLL-FREE FAX
U.S. Department of Homeland Security Science and Technology Directorate James V. Johnson Mail Stop #2100 245 Murray Lane, SW Building 410 Washington, DC 20528	1-866-508-NBAF (6223)

Comment No: 5 Issue Code: 1.0

DHS notes the commentor's concern regarding the mission of the NBAF. Chapter 1, Section 1.1 of the NBAF EIS identifies DHS's mission as the study of foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal or benefit of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies. 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.

Comment No: 6 Issue Code: 5.0

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

Comment No: 7 Issue Code: 5.0

As described in 2.4.3 of the NBAF EIS, DHS considered other potential locations to construct the NBAF including a desert. However, the evaluation criteria called for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce.

Comment No: 8 Issue Code: 2.0

DHS notes the commentor's preference for siting the NBAF in a remote location.

Currigan, Emma

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MD0106

Emma &amp; Curran

[REDACTED]

[REDACTED] n.c.

[REDACTED]

[REDACTED]

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

Dear Sir:

1|24.3

I am writing to encourage  
 you to please seriously consider supporting  
 the NBAF in Butler, N.C. This community  
 needs jobs and your support would greatly  
 help boost the economy in this rural  
 area.

2|15.3

Because I know the people in this  
 part of the world in N.C. are good, hard-  
 working people and as a North Carolina  
 resident, I know the NBAF would

Comment No: 1

Issue Code: 24.3

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

Comment No: 2

Issue Code: 15.3

DHS notes the commentor's support for the Umstead Research Farm Site Alternative. The economic effects of the NBAF at the Umstead Research Farm Alternative are discussed in Section 3.10.7 of the NBAF EIS.

Currihan, Emma

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MD0106

→ -  
help this community get back  
on their feet and make the country  
proud.

cont. |  
11/24/3

Please vote in favor of NBAF  
in Butler, N.C.!

Thank you  
Emma # Currihan

Curry, Jack

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09/21/2008 THU 17:26 FAX HDA - BID

001/001

FD0040

August 21, 2008

Mr. James V. Johnson  
U. S. Department of Homeland Security  
Science and Technology Directorate  
245 Murray Lane, SW  
Building 4:0  
Washington, DC 20528

Dear Mr. Johnson,

1|24.5

I would like to add my strong support for the National Bio and Agro-Defense Facility coming to Mississippi. My family and I live in [REDACTED] Mississippi only a few miles from the proposed facility site. I believe the facility will be safe and have no problem with it being close to my home.

We have a great quality of life with very little crime, very good public and private schools and great opportunities for golfing, hunting, fishing, and water sports. Family Circle magazine recently named Madison one of the Top Ten Towns for Families in America. The City of Madison also has a sister city relationship with Solleftea, Sweden. On a personal note, I have a B.S. in Economics, a M.B.A., and have traveled around the world many times with the U. S. Navy. I hope you chose Mississippi for your site location.

Sincerely,

Jack Curry  
[REDACTED]

Comment No: 1

Issue Code: 24.5

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

Custance, Sue

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WD0551

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**From:** Sue Custance [REDACTED]  
**Sent:** Sunday, August 24, 2008 8:04 PM  
**To:** NBAFProgramManager  
**Subject:** Athens NO

1 | 25.2 | I strongly oppose siting NBAF in Athens.

Sue Custance

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

Czarzasty, Nancy

Page 1 of 1

WD0322

**From:** Nancy Czarzasty [REDACTED]  
**Sent:** Monday, August 18, 2008 12:46 PM  
**To:** Nancy Czarzasty; NBAFProgramManager  
**Subject:** Plum Island Proposal

Dear NBAF Program Manager,

- 1|25.1 I am opposed to changing Plum Island to a Biosafety Level 4 facility. History is filled with "unimaginable," events and "unlikely scenarios." I am in agreement with Dr. Kingsberry from the Government Accountability Office (GAO), in that, there is always a possibility for technology failures and/or human error. Chernobyl and Three Mile Island are perfect examples of both technology failures and human errors.
- 2|21.1 In the remotest possibility of an incident occurring, we must consider the devastation which would occur to Connecticut and New York. I only hope that no one ever has to look back on this (after causing devastating effects on human health) and think that the facility could have been located in a lesser populated area. Although, I do recognize the need and importance of a Biosafety Level 4 facility, I believe it needs to be located in a far less populated area.
- 3|5.0

Thank you for your time and attention. Please feel free to contact me at [REDACTED]  
 Sincerely,

Nancy Czarzasty, RN, MS

Comment No: 1                      Issue Code: 25.1

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

Comment No: 2                      Issue Code: 21.1

DHS notes the commentor's concerns regarding the impact of an pathogen release on the local population, agriculture, 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. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in 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, 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: 3                      Issue Code: 5.0

As described in Section 2.3.1, DHS's site selection process including site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or sem-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.



Czarzasty, Nancy

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WD0334

**From:** Nancy Czarzasty [REDACTED]  
**Sent:** Tuesday, August 12, 2008 3:59 PM  
**To:** NBAFProgramManager  
**Subject:** Plum Island Proposal

1|4.1 Good afternoon,  
 Last evening I attended an open forum for the public to submit their input regarding the proposal of Plum Island. I did have my concern recorded. I would however, like to address my concern again. I am very concerned that more CT residents have no idea that there is a proposal for Plum Island to advance to a BSL-4 facility. No one that I have spoken with has any idea what I am speaking about.

Since the time period for public input closes on August 25<sup>th</sup>, this is obviously time sensitive. I am graciously requesting you re-announce this plan to the CT residents. The newspapers which ads were placed are not appropriate nor were the television statements. The plan to inform the public has failed and I would like to help you get this message out so that CT residents can submit their input.

As instructed last evening, the word of mouth is important. I have taken the liberty to notify and ask for positions on this issue from the Hartford Courant, the New Haven Register, Channel 8 news, the Health District, the Town's Selectman—Mike Pace's office, Senators Dodd and Lieberman, Rep. Joe Courtney and Governor Rell. I have attached the letters sent to the CT leaders this morning.

Again, I am requesting your assistance in further informing the CT residents of this controversial issue. Without properly being informed, CT cannot possibly, adequately submit their input.

Please feel free to contact me at [REDACTED]. Thank you for your time and assistance. I look forward to hearing from you soon.  
 Respectfully,

Nancy Czarzasty, RN, MS

Comment No: 1 Issue Code: 4.1

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.

Czarzasty, Nancy

Page 2 of 3

WD0334

Dear Governor Reil,

I am an Old Saybrook resident who attended an event in Old Saybrook last evening regarding Plum Island. I am interested in your position on this proposal and attracting more public attention to this proposal as the time for public input closes in 2 weeks. This event last night was sponsored by the Department of Homeland Security offering a time for the public to comment on this proposal. In brief, the proposal is to re-build Plum Island to a Bio-Safety Level 4 facility. Basically, this would change Plum Island from only researching animal-pathogen interaction (animal to animal) to researching animal to human virus, etc.

This information can be obtained to the [www.dhs.gov](http://www.dhs.gov) website and searching for BSL-4. This will take you to articles regarding "Why build a new facility." Plum Island is one of 6 potential sites being considered in the U.S. Other sites are all on the mainland. Plum Island has a very significant chance of being selected as this site. Other sites include: Georgia, Mississippi, Kansas, North Carolina and Texas.

As you can imagine there is great concern regarding various safety issues related to this proposal. Extensive analysis has looked at the human risks, socio-economic impacts, terrorism risks and impacts to the geography. Beyond the DHS, various contractors have been involved to determine the risk analysis for each potential site. At the current time, Plum Island appears to be a strong front runner for this new site. Few (less than 4) BSL-4 sites currently exist in the country which includes not having BSL-4 capabilities at the CDC in Atlanta, Aberdeen or Fort Dietrich.

As a CT resident, I have significant concerns regarding Plum Island becoming a BSL-4, as I am certain most CT residents would. My understanding is that a final determination of the BSL-4 site will be determined by fall 2008. We need CT residents to be informed and have their opinion presented.

Governor, our CT residents have not adequately been informed of this proposal and need to be quickly. As mentioned, the time allowed for public input closes in 2 weeks. This is our chance to have our voices heard. I am requesting your help in getting this message out ASAP and for you to take a position on this if you have not already done so.

Although DHS stated they advertised this proposal, by no means has it been adequate. I can go into further details if necessary. Less than a dozen CT residents attended this forum last night who were not Plum Island employees.

As this is a time sensitive issue, I sincerely hope you will call attention to this rapidly. Please feel free to contact me at [REDACTED].  
Thank you for your time and assistance.

Respectfully,  
Nancy Czarzasty, RN, MS

Czarzasty, Nancy

Page 3 of 3

WD0334

Dear Senator Lieberman,

I am writing to you regarding my concerns over the proposed construction of the National Bio and Agro-Defense Facility (NBAF) on the grounds of the Plum Island Animal Disease Center (PIADC). On 11 August, my wife and I attended the forum to discuss the Environmental Impact Statement for the proposed facility that was held in Old Saybrook. What deeply concerns me is the lack of information that was made available to the citizens of Old Saybrook and the surrounding municipalities regarding the public forum and the overall proposal for the NBAF. DHS did a very poor job in advertising the forum and chose outlets for information that are not typically used by the residents of Old Saybrook. I have polled residents of my neighborhood and several citizens of our town and have consistently found that NO ONE is aware of the plans for PIADC and NBAF. I have seen no mention of this in local broadcast media and a small announcement that was printed in a local paper that is rarely read by the average citizen. I happened to come across the ad by chance, thankfully. DHS seems to have focused on New York for the information campaign; however, Connecticut is a major stakeholder in this proposal due to geography and the fact that PIADC employees use the marina at Saybrook Point as a transit point for travel to and from the facility by a federally-run ferry. My experience has been that Old Saybrook citizens are generally very civically-aware and, had they known about this proposal, would have attended last night's forum in significant numbers. I would like to request your intervention in moving the closing date for public comment, currently set for 25 August, to a later date and that DHS make a concerted effort to inform Connecticut's citizens of this colossal project and the potential environmental and security concerns that come with it.

Thank you in advance for your intervention.

James P. Czarzasty

D, Jess

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WD0005

From: jess d [REDACTED]  
 Sent: Saturday, June 21, 2008 6:28 PM  
 To: NBAFProgramManager  
 Subject: ....

1| 25.0 yes because building a foot and mouth disease center on the main land is the most intelligent thing to do!  
 You people are frigin idiots! isn't bad enough we pay almost \$5 dollars a gallon in gas to go to the  
 2| 15.0 grocery store?! OH NO lets have our livestock contract a deadly disease and have the American people  
 3| 1.0 pay a ton more money already for meat products.... You people make me sick! sometimes i wish i wasn't  
 an American citizen because I'm ashamed on how our government represents us!

Comment No: 1 Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF.

Comment No: 2 Issue Code: 15.0

DHS notes the commentor's concern. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible economic effect would be significant for all sites. Section 3.10.9 of the NBAF DEIS presents estimates of the possible economic effect of an accidental release. Specifically, a virus released to the environment could become established and result in significant economic harm through damage to the livestock industry (culling and export bans) from FMD or through increased public health costs associated with the treatment of humans infected with the causal agent of RVF or Nipah. It should be noted that a primary objective of the NBAF is to combat the spread of viruses that could enter the US inadvertently or as the result of a terrorism act. Hence, the risk of operating the NBAF must be balanced against the potential benefits of the research that would be conducted at the facility.

Comment No: 3 Issue Code: 1.0

DHS notes the commentor's concern regarding 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. NBAF will research the transmission of these animal diseases and develop 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.

Dallmeyer, Dorinda

Page 1 of 2

WD0264

**From:** Dorinda Dallmeyer [REDACTED]  
**Sent:** Thursday, August 14, 2008 11:30 AM  
**To:** NBAFProgramManager  
**Subject:** Comments on Draft EIS for Proposed NBAF

- 1|13.2 | I would like to bring your attention to a failure of the Draft EIS to address impacts on wildlife – specifically whitetail deer -- in anything other than the most cursory fashion. While my focus this afternoon is on the South Milledge Avenue site, the same is true for the other mainland candidate sites.
- 2|15.2 | In section 3.10.3.1.1.3, the Draft EIS relies on 2001 U.S. census data indicating that expenditures related to recreational hunting activities in the State of Georgia totaled \$504 million (USCEN 2001). However, there is more recent data available from the U.S. Fish and Wildlife Service and the Congressional Sportsmen’s Foundation. (See the website [http://www.sportsmenslink.org/reports\\_and\\_data/Sportsmens-Economic-Impact.html](http://www.sportsmenslink.org/reports_and_data/Sportsmens-Economic-Impact.html)). Nearly 350,000 Georgia residents hunt deer and Georgia ranks number one in the country for out-of-state hunters who come here: 136,000 people. Hunting currently provides nearly 15,000 jobs for Georgians – 45 times the number of jobs at the proposed NBAF – accounting for \$430 million in annual wages. Hunting also provides yearly revenues of \$100 million in federal taxes and \$93 million state and local taxes, with the broader ripple effect on Georgia’s economy estimated to be \$1.4 billion dollars. These figures dwarf the \$32 million annual total for income and taxes the Draft EIS projects for the Athens site (Section 3.10.3.2.1). Data for Kansas, Texas, North Carolina, and Mississippi also reflect that the value of the hunting economy of each state far outstrips the putative economic benefits that will come from the proposed facility.
- 1cont. | These economic data are relevant in evaluating the potential impact of an  
 13.2 | accidental or deliberate release of pathogens from the proposed South Milledge Avenue site. Section 3.8.3.1.4 of the Draft EIS correctly notes that the proposed South Milledge Avenue site is located adjacent to bottomland hardwood forests along the Middle Oconee River, which serve not only as deer habitat but also as a corridor for dispersal. According to UGA professor Karl Miller, a noted authority on whitetail deer, large home ranges are reported for deer in bottomland hardwood habitats such as those found along the Middle Oconee. (Quality Whitetails, p. 89). Thus we have the potential for a great deal of movement of whitetail deer all along the Middle Oconee corridor and into other forage areas, such as livestock pastures. Indeed, Dr. Miller notes that yearling males disperse as much as 2-6 miles from their maternal home range. (Ibid.). Although the Draft EIS maps the density of livestock found in the vicinity of each candidate site, it fails to include any data on population density and dispersal characteristics for deer, which are as susceptible to Foot-and-mouth Disease (FMD) and Rift Valley Fever as domestic livestock.
- 3|21.2 | Of course, the Facility will have a perimeter fence designed to keep deer out. But no fence can keep viruses in, especially the FMD virus which is easily spread by aerosol transmission. Nor can a fence contain insect vectors such as mosquitoes infected with other pathogens transmissible to deer, such as Rift Valley Fever. The Draft EIS states that nearby wetlands and northeast Georgia’s

Comment No: 1                      Issue Code: 13.2

Section 3.8.9 provides a detailed analysis of the potential effects of an accidental release on wildlife. Although the Draft EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction. Suitable habitat for white-tailed deer is abundant in the vicinity of the proposed NBAF site, and the Draft EIS states that deer are abundant and widespread in the vicinity of the site. White-tailed deer generally occur as solitary individuals or in small groups, and small group size and limited interaction among groups may potentially limit the spread of a disease such as FMD.

Comment No: 2                      Issue Code: 15.2

DHS notes the commentor’s reference to more recent statistics and has updated Section 3.10 of the NBAF FEIS sections appropriately.

Comment No: 3                      Issue Code: 21.2

The DHS notes the commentor’s concern with the risks to wildlife associated with a pathogen release. 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, and 3.14 (Health and Safety), and Appendices B, D, and E of the NBAF EIS, provide a detailed analysis of the consequences from a accidental or deliberate pathogen release. Pathogen release scenarios include for example, an analysis of the potential consequences of Rift Valley Fever (RVF) virus becoming established in native mosquito populations. 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. RVF and FMD standard operating procedures and response plans would likely include strategies that are similar. However, the RVF response plan would also include a mosquito control action plan.

Dallmeyer, Dorinda

Page 2 of 2

WD0264

3 cont. | generally mild winters could facilitate the establishment of mosquito  
21.2 | populations harboring Rift Valley Fever in this same wildlife corridor. Also any  
attempt to control mosquito populations by aerial spraying of pesticides such as  
those currently in use on Long Island could have deleterious effects on non-  
target wildlife species such as bees, fish, and birds.

2 cont. | The current practice for controlling deer at the Plum Island facility is to kill every  
15.2 | deer that sets foot on the island. "Depopulating" deer may be feasible when the  
area you have to control is an 840-acre island (equal to 1.3 square miles)  
surrounded by a very effective moat otherwise known as the Atlantic Ocean. But  
it would be a completely different matter to control a release into a highly  
mobile population of deer as we have here, deer that could serve as a source of  
infection not only to each other but also to domestic livestock. A release would  
be a disaster for a wide range of sectors of Georgia's economy that depend on  
our natural environment.

3 cont. | Although there may be only a small probability for an accidental or deliberate  
21.2 | release of pathogens from the facility, the benefits of siting this facility here are  
outweighed by the risks to the Middle Oconee River corridor, the risk to wildlife  
resources, and the risk to our economy statewide. No doubt NBAF will have  
state-of-the-art technology and highly trained personnel. But it would be  
absurd not to make the most also of the natural advantage an island provides in  
4|5.0 | terms of security and in terms of containing the dispersal of pathogens. If this  
facility is built, it has no business on the mainland.

Dorinda G. Dallmeyer

GA

Comment No: 4 Issue Code: 5.0

DHS notes the commentator's opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though Plum Island 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. In addition, security concerns will be considered in the selection of the preferred alternative.

Dannenberg, Andrew

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WD0887

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**From:** Heaton, Sarah (CDC/CCEHIP/NCEH) [gr14@cdc.gov]  
**Sent:** Wednesday, September 10, 2008 10:46 AM  
**To:** NBAFProgramManager  
**Cc:** Dannenberg, Andrew (CDC/CCEHIP/NCEH); Lucido, Sal (CDC/OD/OEC); Buigut, Jennifer E. (CDC/OD/OEC)  
**Subject:** Official comments from DHHS/USPHS: NBAF DEIS  
**Attachments:** NBAF final.pdf

NBAF Program Manager,

Attached are the official comments sent on behalf of DHHS and the US Public Health Service. We appreciate your patience with regard to our review of this very important document.

Take care and thank you again.

*Sincerely,*

*Sarah K. Heaton*

Sarah K. Heaton, MPH  
Presidential Management Fellow  
Public Health Analyst  
National Center for Environmental Health  
Centers for Disease Control and Prevention  
4770 Buford Highway, MS-F60  
Atlanta, GA 30030  
770.488.7446  
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770.488.4820 (fax)  
[SHeaton@cdc.gov](mailto:SHeaton@cdc.gov)

*Opportunity is missed by most because it is dressed in overalls and looks like work.* --Thomas Alva Edison,  
American Inventor (1847-1931)

Dannenberg, Andrew

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DEPARTMENT OF HEALTH &amp; HUMAN SERVICES

WD0887

Public Health Service

Centers for Disease Control  
and Prevention (CDC)  
Atlanta GA 30333

U.S. Department of Homeland Security  
Science and Technology Directorate  
James V. Johnson  
245 Murray Lane, SW; Building 410; Mail Stop #2100  
Washington, DC 20528  
Fax: 1-866-508-NBAF (6223)

Dear Mr. James V. Johnson:

This is in response to *DRAFT Environmental Impact Statement for the National Bio and Agro-Defense Facility (NBAF) within the Department of Homeland Security*. We are responding on behalf of the Department of Health and Human Services (DHHS), U.S. Public Health Service.

This document was reviewed by the Centers of Disease Control and Prevention's NIOSH Office for Emergency Preparedness and Response and the Special Pathogens Branch of the Division of Viral and Rickettsial Diseases within the National Center for Zoonotic, Vector-Borne, and Enteric Diseases. Following is a summary of the comments:

#### NIOSH Office for Emergency Preparedness and Response

##### General comments:

The document contains a thorough and comprehensive estimation of various hazard evaluations, accident analysis, and assessments of risk at the proposed sites. Chapter 3.14 (Health and Safety) and Appendix E and F investigate the risk potentials from bio-agent release, operational accidents, and from natural phenomenon such as earthquakes.

##### Worker Safety and Occupational Health comments:

The EIS document takes a holistic approach to environmental impact within each of the communities from a public health and environmental health perspective. It does not address the occupational health considerations involved in several critical phases of implementation of the final site selection:

- Decommissioning
- Construction
- Operations
- Emergency Planning

During both decommissioning of existing site structures and new building construction there exists the risk to worker injury and illness. After construction, the operation of the facility involves the implementation of written safety and occupational health policies and procedures and worker surveillance and exposure monitoring. In the event of natural or man-made disaster, crisis operational safety planning and business continuity planning are necessary to reduce

1 of 3

Comment No: 1

Issue Code: 26.0

DHS notes the commentor's concern. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. While human errors are possible, training and inherent biocontainment safeguards reduce the likelihood of a release. 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.

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. Specifically, 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: 2

Issue Code: 19.0

DHS notes the commentor's concern. A discussion of human health and safety is included in Section 3.14 of the NBAF EIS. 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 2.2.2 of the NBAF EIS identifies the need to develop basic safety protocols and guidelines prior to construction and operation of the NBAF. These protocols would include plans for medical emergencies, facility malfunctions, fires, animals escaping within the laboratory, and other potential emergencies. Training in emergency response procedures would be provided to emergency response personnel and other responsible staff according to institutional policies. Many of the training and testing requirements are to maintain certification and licensure to operate a laboratory, which generally take up to a year beyond the construction phase to complete. The BMBL is the primary guidance source to ensure a safe and effective testing and training program for successful state-of-the-art biocontainment laboratory facilities. Section 2.2.1.2 of the NBAF EIS identifies the need for safety protocols during construction.

1|26.0  
2|19.0



## Dannenberg, Andrew

## Page 3 of 4

WD0887

1 cont. | 26.0  
2 cont. | 19.0

worker injury and illness. The document should address in some manner the overall approach to protection of construction workers and facilities employees during all phases of construction and operation. An occupational safety and health management plan should be a part of the risk control planning processes. A comprehensive safety model which incorporates modern leading indicators and lagging indicators of safety performance could be described in the document to enhance its comprehensive scope.

**Special Pathogens Branch, Division of Viral and Rickettsial Diseases  
National Center for Zoonotic, Vector-Borne, and Enteric Diseases**

3 | 23.0

DHS has adequately considered and assessed the potential public health impacts of the NBAF laboratory. Assuming that the NBAF lab will not be involved in the large-scale production of viruses (either RVF or Nipah), standard operating procedures (SOPs) and the treatment of effluent liquids from the laboratory should insure containment of routine lab-scale volumes of infectious materials. There are no published data on the release of aerosol for RVF or Nipah and their potential for infecting animals.

**RVF:**4 | 21.0  
2 cont. | 19.0

The bibliography only includes one reference (Kasari et al., 2008) and would benefit from other relevant references such as the European plan for RVF introduction in the EEC. There is a misunderstanding on how the virus could escape from the laboratory. The EIS discussion is based on the Kasari reference that mentions the possibility of release of infected mosquitoes from containers coming from endemic areas. The most likely escape from the laboratory will be through a laboratory infection which is difficult in a BSL-3 environment (where the workers are immunized) and even more difficult in a BSL-4 environment (where workers are not immunized but will require a laboratory accident that will be reported, e.g. needle stick).

In 3.8.9.2, the RVF mortality mentioned in the third paragraph for adult animals is too high; in goats and cattle usually less than 10%, and in sheep, well-conducted studies in South Africa report 5-30% (the 70% comes from Egypt reports during the 1978 outbreak).

**Nipah:**

Same concern as RVF concerning the release. A laboratory infection is the most likely way to get the virus outside of the containment. Being a BSL-4 agent, it will require an incident in the lab that will be reported. In case of Nipah or Hendra, the chain of transmission will stop there.

In the Health and Safety Assessment on pgs. 9-10, two new human cases due to Hendra virus infection occurred with one death in Queensland, Australia, in the last few weeks.

5 | 4.0

Thank you for the opportunity to review and comment on this document. Please send us a copy of any future documents related to this project which may indicate potential public health impacts and are developed under the National Environmental Policy Act (NEPA).

2 of 3

Comment No: 3 Issue Code: 23.0

DHS notes the commentor's statement.

Comment No: 4 Issue Code: 21.0

DHS appreciates the commentor's data and information. The references addressed in the EIS are intended to provide information and considerations tailored to a release event within the United States. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. Nevertheless, 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 all appropriate and relevant plans that have been developed in response to a natural or accidental animal disease outbreak. The Australia Hendra virus infection occurred at the Redlands Veterinary Clinic, which is not a BSL containment facility, so no update is necessary to the appendix.

Comment No: 5 Issue Code: 4.0

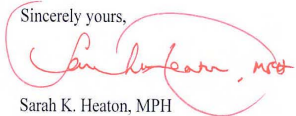
DHS notes commentor's request and will comply.

**Dannenberg, Andrew**

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WD0887

Sincerely yours,



Sarah K. Heaton, MPH  
Public Health Analyst  
Presidential Management Fellow  
Division of Emergency and Environmental Health Services  
National Center for Environmental Health  
Centers for Disease Control and Prevention

Submitted on behalf of:  
Andrew L. Dannenberg, MD, MPH  
Associate Director for Science  
Division of Emergency and Environmental Health Services  
National Center for Environmental Health  
Centers for Disease Control and Prevention  
4770 Buford Highway, MS F-60  
Atlanta, GA 30341

Cc:  
Sal Lucido  
Jennifer Buigut

3 of 3

Dantzer, Elaine

Page 1 of 1

June 28, 2004

MD0011

Dear Sir:

I appreciate the opportunity to express my opinion of NBAF EIS.

I feel life in the safest environment we can achieve is our responsibility.

Therefore I can not agree that any facility that endangers our life is a good idea.

The DVD mailed would not play on my DVD. So I don't claim to know your reasons for choosing the site in Athens, except maybe USQ, or South Milledge Avenue is promoting this location.

I have read articles printed in the Athens Banner Herald papers and for and against this location. Since no one can guarantee accidents I hope you move this idea to a location not inhabited by people.

Elaine Dantzer  
House wife, [REDACTED], Ga.

Comment No: 1

Issue Code: 1.0

DHS notes the commentor's statement. Chapter 1, Section 1.1 of the NBAF EIS identifies DHS's mission as the study of foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal or benefit of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies. 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.

Comment No: 2

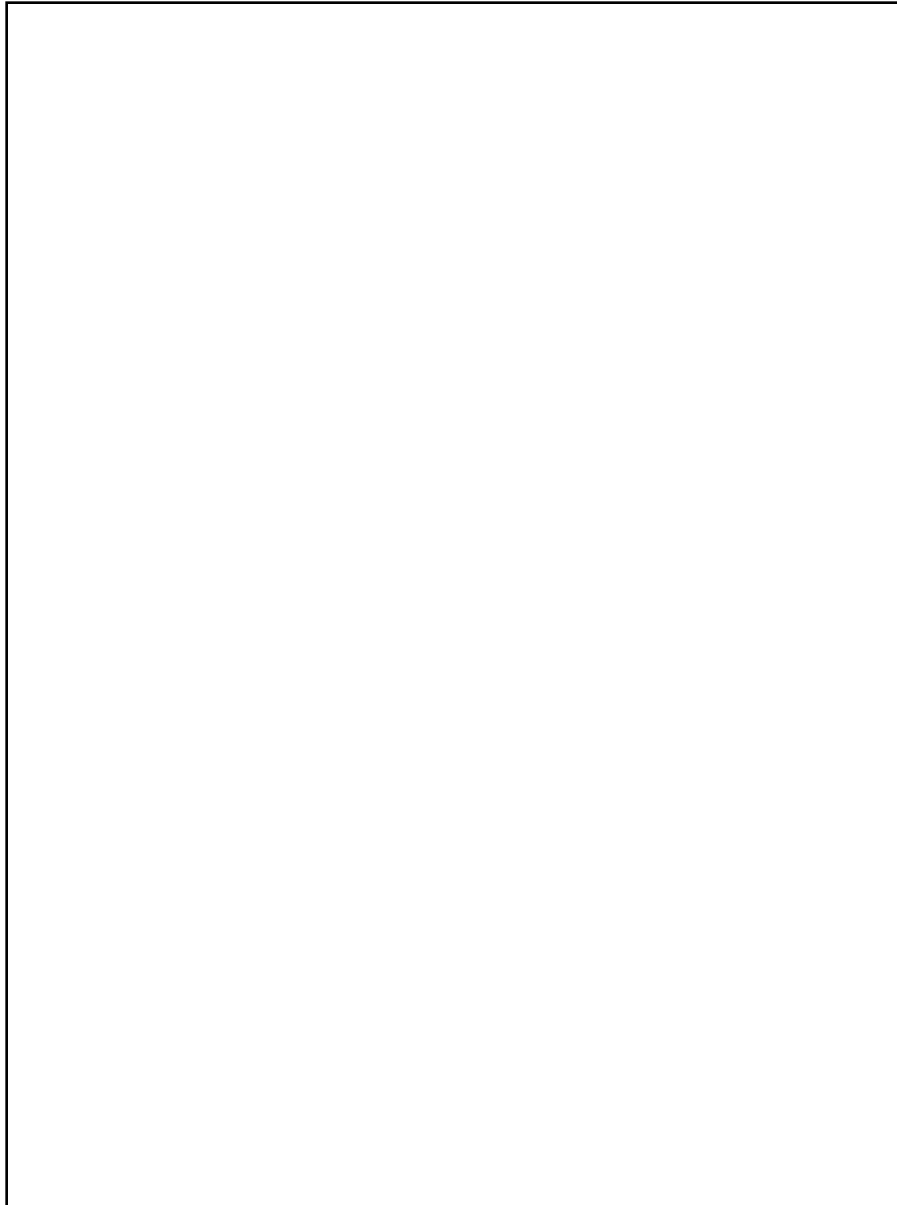
Issue Code: 21.2

DHS acknowledges 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 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. The risk of an accidental release of a pathogen is extremely low. 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: 5.0

As described in Section 2.3.1, DHS's site selection process including site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or semi-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and



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

Davis, Brian

Page 1 of 1

WD0008

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**From:** Brian\_Davis@blm.gov  
**Sent:** Monday, June 23, 2008 1:39 PM  
**To:** NBAFFProgramManager  
**Cc:** Lisa\_Fretz@blm.gov; Shannon\_Shaw@nm.blm.gov  
**Subject:** National Bio and Agro-Defense Facility  
**Importance:** High

Dear Madam or Sir,

1| 6.4  
 2| 6.6

I have scanned through the EIS but unfortunately there are no maps depicting the proposed sites and with 7.5 million acres of subsurface under our jurisdiction, I am respectfully requesting maps, in a GIS compatible format, for the San Antonio Research Park and the KS Manhattan Campus sites in order to check to see if the are underlaid by federally managed mineral estate. It is our position, that said mineral estate, if currently leased is available to be developed by the lessee. If these sites are underlaid by unleased minerals, surface restrictions such as no surface occupancy could be attached at the time they are offered for leasing.

Thanks, BWD

Brian W. Davis  
 Assistant Field Manager Minerals  
 Oklahoma Field Office  
 7906 E. 33rd Street, Suite 101  
 Tulsa, OK 74145  
 918.621.4100 Main Number  
 918.621.4114 Direct  
 918.621.4130 Fax  
 918.770.2260 Cell  
 Brian\_Davis@blm.gov

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Comment No: 1                      Issue Code: 6.4

DHS notes the commentor's concern. Coordination with the Bureau of Land Management will be initiated once the ROD has been signed.

Comment No: 2                      Issue Code: 6.6

DHS notes the commentor's concern. Coordination with the Bureau of Land Management will be initiated once the ROD has been signed.

Davison, Al

Page 1 of 1

WD0384

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**From:** Al Davison [REDACTED]  
**Sent:** Tuesday, August 19, 2008 7:41 PM  
**To:** NBAFProgramManager  
**Subject:** Support for NBAF in Athens, Georgia

Dear Mr. Johnson:

1|24.2 | I am writing to express my support and enthusiasm for the NBAF project being considered for Athens, Georgia. I have read almost nothing about what I believe to be the most important reason for you to select Athens, Georgia - your employee and staff retention rates will be much higher in Athens than in the other finalist sites because we quite simply offer a much better place for them to live, work, and play!

You are very welcome here and we look forward to having you.

Thank you!

Al Davison  
[REDACTED]  
[REDACTED] GA [REDACTED]

Comment No: 1

Issue Code: 24.2

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

Davison, Heidi

Page 1 of 7

WD0493

**From:** HeidiDavison@co.clarke.ga.us  
**Sent:** Friday, August 22, 2008 12:55 PM  
**To:** NBAFProgramManager  
**Subject:** Executive Order: Strengthening Federal Environmental, Energy, and Transportation

Mr. Johnson:

1| 4.2 | At least week's meeting held in Athens, GA to present findings from the DEIS, I indicated that in my reading of the document members of the team who performed the studies had obviously spend time reviewing zoning codes and other portions of our local environmental ordinances that are applicable to this project. This thoroughness on their part is much appreciated.

2| 24.2 | I also strongly urged that those local regulatory provisions be adhered to in the construction of this facility should Athens be chosen, which I hope it will.

Since that time, the Executive Order noted here has come to my attention.

3| 3.0 | Executive Order: Strengthening Federal Environmental, Energy, and Transportation Management  
<http://www.whitehouse.gov/news/releases/2007/01/20070124-2.htm#>

In reviewing this document it is clear to me that the President has sent a strong message to all federal departments regarding the importance of managing projects in ways that address long term environmental sustainability, which mirrors the goals of the ordinances within our Athens-Clarke County code.

4| 23.0 | CDC's new LEED certified building is the example of this executive order in practice, on the ground. In my comments, I also strongly urged DHS to use LEED standards for NBAF suggesting that if such a building could be constructed at the CDC then there seemed little reason why one couldn't be built elsewhere.

4 cont|  
23.0 | Our strong, local environmental ordinances should work in concert with President Bush's executive order to ensure a building that truly is 'green' and enhances versus degrades the site upon which it rests, its surroundings, and the overall quality of the community.

I would like to have this email with the noted executive order considered as an amendment to my statement of August 14th.

Thank you very much for your consideration.

Comment No: 1                      Issue Code: 4.2

DHS notes the commentor's statement.

Comment No: 2                      Issue Code: 24.2

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

Comment No: 3                      Issue Code: 3.0

DHS notes the commentor's statement. Should a decision be made to build NBAF, the final facility design and subsequent construction and operational planning will consider and incorporate the applicable provisions of the referenced Executive Order.

Comment No: 4                      Issue Code: 23.0

DHS notes commentor's recommendation to design the NBAF facilities at the South Milledge Avenue Site to meet "green" standards, specifically Leadership in Energy and Environmental Design (LEED) certification. As discussed throughout the NBAF EIS, DHS is committed to implementing a low impact design (LID) approach for NBAF so as to minimize the facility's impact on the landscape. DHS will document, review and incorporate all appropriate new and/or revised information for the NBAF final design.

**Davison, Heidi**

**Page 2 of 7**

**WD0493**

heidi

Mayor Heidi Davison  
301 College Avenue, Suite 300  
Athens, Georgia 30601  
Phone: (706) 613-3010  
Fax: (706) 613-3033



Davison, Heidi

Page 3 of 7

WD0493


 CLICK HERE TO PRINT

For Immediate Release  
Office of the Press Secretary  
January 24, 2007

### Executive Order: Strengthening Federal Environmental, Energy, and Transportation Management

By the authority vested in me as President by the Constitution and the laws of the United States of America, and to strengthen the environmental, energy, and transportation management of Federal agencies, it is hereby ordered as follows:

Section 1. Policy. It is the policy of the United States that Federal agencies conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.

Sec. 2. Goals for Agencies. In implementing the policy set forth in section 1 of this order, the head of each agency shall:

- (a) improve energy efficiency and reduce greenhouse gas emissions of the agency, through reduction of energy intensity by (i) 3 percent annually through the end of fiscal year 2015, or (ii) 30 percent by the end of fiscal year 2015, relative to the baseline of the agency's energy use in fiscal year 2003;
- (b) ensure that (i) at least half of the statutorily required renewable energy consumed by the agency in a fiscal year comes from new renewable sources, and (ii) to the extent feasible, the agency implements renewable energy generation projects on agency property for agency use;
- (c) beginning in FY 2008, reduce water consumption intensity, relative to the baseline of the agency's water consumption in fiscal year 2007, through life-cycle cost-effective measures by 2 percent annually through the end of fiscal year 2015 or 16 percent by the end of fiscal year 2015;
- (d) require in agency acquisitions of goods and services (i) use of sustainable environmental practices, including acquisition of biobased, environmentally preferable, energy-efficient, water-efficient, and recycled-content products, and (ii) use of paper of at least 30 percent post-consumer fiber content;
- (e) ensure that the agency (i) reduces the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of by the agency, (ii) increases diversion of solid waste as appropriate, and (iii) maintains cost-effective waste prevention and recycling programs in its facilities;
- (f) ensure that (i) new construction and major renovation of agency buildings comply with the Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings set forth in the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding (2006), and (ii) 15 percent of the existing Federal capital asset building inventory of the agency as of the end of fiscal year 2015 incorporates the sustainable practices in the Guiding Principles;
- (g) ensure that, if the agency operates a fleet of at least 20 motor vehicles, the agency, relative to agency baselines for fiscal year 2005, (i) reduces the fleet's total consumption of petroleum products by 2 percent annually through the end of fiscal year 2015, (ii) increases the total fuel consumption that is non-petroleum-based by 10 percent annually, and (iii) uses plug-in hybrid (PIH) vehicles when PIH vehicles are commercially available at a cost reasonably comparable, on the basis of life-cycle cost, to non-PIH vehicles; and

## Davison, Heidi

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## WD0493

(h) ensure that the agency (i) when acquiring an electronic product to meet its requirements, meets at least 95 percent of those requirements with an Electronic Product Environmental Assessment Tool (EPEAT)-registered electronic product, unless there is no EPEAT standard for such product, (ii) enables the Energy Star feature on agency computers and monitors, (iii) establishes and implements policies to extend the useful life of agency electronic equipment, and (iv) uses environmentally sound practices with respect to disposition of agency electronic equipment that has reached the end of its useful life.

Sec. 3. Duties of Heads of Agencies. In implementing the policy set forth in section 1 of this order, the head of each agency shall:

(a) implement within the agency sustainable practices for (i) energy efficiency, greenhouse gas emissions avoidance or reduction, and petroleum products use reduction, (ii) renewable energy, including bioenergy, (iii) water conservation, (iv) acquisition, (v) pollution and waste prevention and recycling, (vi) reduction or elimination of acquisition and use of toxic or hazardous chemicals, (vii) high performance construction, lease, operation, and maintenance of buildings, (viii) vehicle fleet management, and (ix) electronic equipment management;

(b) implement within the agency environmental management systems (EMS) at all appropriate organizational levels to ensure (i) use of EMS as the primary management approach for addressing environmental aspects of internal agency operations and activities, including environmental aspects of energy and transportation functions, (ii) establishment of agency objectives and targets to ensure implementation of this order, and (iii) collection, analysis, and reporting of information to measure performance in the implementation of this order;

(c) establish within the agency programs for (i) environmental management training, (ii) environmental compliance review and audit, and (iii) leadership awards to recognize outstanding environmental, energy, or transportation management performance in the agency;

(d) within 30 days after the date of this order (i) designate a senior civilian officer of the United States, compensated annually in an amount at or above the amount payable at level IV of the Executive Schedule, to be responsible for implementation of this order within the agency, (ii) report such designation to the Director of the Office of Management and Budget and the Chairman of the Council on Environmental Quality, and (iii) assign the designated official the authority and duty to (A) monitor and report to the head of the agency on agency activities to carry out subsections (a) and (b) of this section, and (B) perform such other duties relating to the implementation of this order within the agency as the head of the agency deems appropriate;

(e) ensure that contracts entered into after the date of this order for contractor operation of government-owned facilities or vehicles require the contractor to comply with the provisions of this order with respect to such facilities or vehicles to the same extent as the agency would be required to comply if the agency operated the facilities or vehicles;

(f) ensure that agreements, permits, leases, licenses, or other legally-binding obligations between the agency and a tenant or concessionaire entered into after the date of this order require, to the extent the head of the agency determines appropriate, that the tenant or concessionaire take actions relating to matters within the scope of the contract that facilitate the agency's compliance with this order;

(g) provide reports on agency implementation of this order to the Chairman of the Council on such schedule and in such format as the Chairman of the Council may require; and

(h) provide information and assistance to the Director of the Office of Management and Budget, the Chairman of the Council, and the Federal Environmental Executive.

Sec. 4. Additional Duties of the Chairman of the Council on Environmental Quality. In implementing the policy set forth in section 1 of this order, the Chairman of the Council on Environmental Quality:

Davison, Heidi

Page 5 of 7

## WD0493

(a) (i) shall establish a Steering Committee on Strengthening Federal Environmental, Energy, and Transportation Management to advise the Director of the Office of Management and Budget and the Chairman of the Council on the performance of their functions under this order that shall consist exclusively of (A) the Federal Environmental Executive, who shall chair, convene and preside at meetings of, determine the agenda of, and direct the work of, the Steering Committee, and (B) the senior officials designated under section 3(d)(i) of this order, and (ii) may establish subcommittees of the Steering Committee, to assist the Steering Committee in developing the advice of the Steering Committee on particular subjects;

(b) may, after consultation with the Director of the Office of Management and Budget and the Steering Committee, issue instructions to implement this order, other than instructions within the authority of the Director to issue under section 5 of this order; and

(c) shall administer a presidential leadership award program to recognize exceptional and outstanding environmental, energy, or transportation management performance and excellence in agency efforts to implement this order.

Sec. 5. Duties of the Director of the Office of Management and Budget. In implementing the policy set forth in section 1 of this order, the Director of the Office of Management and Budget shall, after consultation with the Chairman of the Council and the Steering Committee, issue instructions to the heads of agencies concerning:

(a) periodic evaluation of agency implementation of this order;

(b) budget and appropriations matters relating to implementation of this order;

(c) implementation of section 2(d) of this order; and

(d) amendments of the Federal Acquisition Regulation as necessary to implement this order.

Sec. 6. Duties of the Federal Environmental Executive. A Federal Environmental Executive designated by the President shall head the Office of the Federal Environmental Executive, which shall be maintained in the Environmental Protection Agency for funding and administrative purposes. In implementing the policy set forth in section 1 of this order, the Federal Environmental Executive shall:

(a) monitor, and advise the Chairman of the Council on, performance by agencies of functions assigned by sections 2 and 3 of this order;

(b) submit a report to the President, through the Chairman of the Council, not less often than once every 2 years, on the activities of agencies to implement this order; and

(c) advise the Chairman of the Council on the Chairman's exercise of authority granted by subsection 4(c) of this order.

Sec. 7. Limitations. (a) This order shall apply to an agency with respect to the activities, personnel, resources, and facilities of the agency that are located within the United States. The head of an agency may provide that this order shall apply in whole or in part with respect to the activities, personnel, resources, and facilities of the agency that are not located within the United States, if the head of the agency determines that such application is in the interest of the United States.

(b) The head of an agency shall manage activities, personnel, resources, and facilities of the agency that are not located within the United States, and with respect to which the head of the agency has not made a determination under subsection (a) of this section, in a manner consistent with the policy set forth in section 1 of this order to the extent the head of the agency determines practicable.

Sec. 8. Exemption Authority. (a) The Director of National Intelligence may exempt an intelligence activity

## Davison, Heidi

## Page 6 of 7

## WD0493

of the United States, and related personnel, resources, and facilities, from the provisions of this order, other than this subsection and section 10, to the extent the Director determines necessary to protect intelligence sources and methods from unauthorized disclosure.

(b) The head of an agency may exempt law enforcement activities of that agency, and related personnel, resources, and facilities, from the provisions of this order, other than this subsection and section 10, to the extent the head of an agency determines necessary to protect undercover operations from unauthorized disclosure.

(c) (i) The head of an agency may exempt law enforcement, protective, emergency response, or military tactical vehicle fleets of that agency from the provisions of this order, other than this subsection and section 10.

(ii) Heads of agencies shall manage fleets to which paragraph (i) of this subsection refers in a manner consistent with the policy set forth in section 1 of this order to the extent they determine practicable.

(d) The head of an agency may submit to the President, through the Chairman of the Council, a request for an exemption of an agency activity, and related personnel, resources, and facilities, from this order.

Sec. 9. Definitions. As used in this order:

(a) "agency" means an executive agency as defined in section 105 of title 5, United States Code, excluding the Government Accountability Office;

(b) "Chairman of the Council" means the Chairman of the Council on Environmental Quality, including in the Chairman's capacity as Director of the Office of Environmental Quality;

(c) "Council" means the Council on Environmental Quality;

(d) "environmental" means environmental aspects of internal agency operations and activities, including those environmental aspects related to energy and transportation functions;

(e) "greenhouse gases" means carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride;

(f) "life-cycle cost-effective" means the life-cycle costs of a product, project, or measure are estimated to be equal to or less than the base case (i.e., current or standard practice or product);

(g) "new renewable sources" means sources of renewable energy placed into service after January 1, 1999;

(h) "renewable energy" means energy produced by solar, wind, biomass, landfill gas, ocean (including tidal, wave, current and thermal), geothermal, municipal solid waste, or new hydroelectric generation capacity achieved from increased efficiency or additions of new capacity at an existing hydroelectric project;

(i) "energy intensity" means energy consumption per square foot of building space, including industrial or laboratory facilities;

(j) "Steering Committee" means the Steering Committee on Strengthening Federal Environmental, Energy, and Transportation Management established under subsection 4(b) of this order;

(k) "sustainable" means to create and maintain conditions, under which humans and nature can exist in productive harmony, that permit fulfilling the social, economic, and other requirements of present and future generations of Americans; and

Davison, Heidi

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## WD0493

(l) "United States" when used in a geographical sense, means the fifty states, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the United States Virgin Islands, and the Northern Mariana Islands, and associated territorial waters and airspace.

Sec. 10. General Provisions. (a) This order shall be implemented in a manner consistent with applicable law and subject to the availability of appropriations.

(b) Nothing in this order shall be construed to impair or otherwise affect the functions of the Director of the Office of Management and Budget relating to budget, administrative, or legislative proposals.

(c) This order is intended only to improve the internal management of the Federal Government and is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by a party against the United States, its departments, agencies, instrumentalities, entities, officers, employees or agents, or any other person.

Sec. 11. Revocations; Conforming Provisions. (a) The following are revoked:

(i) Executive Order 13101 of September 14, 1998;

(ii) Executive Order 13123 of June 3, 1999;

(iii) Executive Order 13134 of August 12, 1999, as amended;

(iv) Executive Order 13148 of April 21, 2000; and

(v) Executive Order 13149 of April 21, 2000.

(b) In light of subsection 317(e) of the National Defense Authorization Act for Fiscal Year 2002 (Public Law 107 107), not later than January 1 of each year through and including 2010, the Secretary of Defense shall submit to the Senate and the House of Representatives a report regarding progress made toward achieving the energy efficiency goals of the Department of Defense.

(c) Section 3(b)(vi) of Executive Order 13327 of February 4, 2004, is amended by striking "Executive Order 13148 of April 21, 2000" and inserting in lieu thereof "other executive orders".

GEORGE W. BUSH

THE WHITE HOUSE,

January 24, 2007.

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Return to this article at:

<http://www.whitehouse.gov/news/releases/2007/01/20070124-2.html>

 CLICK HERE TO PRINT

**Davison, Heidi**

**Page 1 of 1**

**WD0496**

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**From:** HeidiDavison@co.clarke.ga.us  
**Sent:** Friday, August 22, 2008 1:29 PM  
**To:** NBAFProgramManager  
**Subject:** Athens, GA meeting

Mr. Johnson,  
Although probably not necessary or expected, I do wish to apologize for what I believe was the rude and boorish behavior of some members of the audience at last week's August 14th meeting. It was disappointing and embarrassing to witness this type of response from individuals who I consider friends and supporters.

Some of those folks are not Athens-Clarke County residents. Unfortunately, to my dismay, many of them are.

1| 4.2

Thanks for taking the time to visit Athens, again, and for your patience in providing information to our local citizens. I also appreciate the members of your team for their presentations and patience in answering the concerns of those who provided questions and comment.  
heidi

Mayor Heidi Davison  
301 College Avenue, Suite 300  
Athens, Georgia 30601  
Phone: (706) 613-3010  
Fax: (706) 613-3033

Comment No: 1      Issue Code: 4.2

DHS notes the commentor's statement. DHS is committed to providing public access to pertinent information and encouraging public input on matters of national and international importance.

Dayton, Susan

Page 1 of 2

NCD008

**BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE**www.BREDL.org PO BOX 88 Glendale Springs, North Carolina 28629 BREDL@skybest.com (336) 982-2691 office

July 29, 2008

U.S. Department of Homeland Security  
 Science and Technology Directorate  
 James V. Johnson  
 Mail Stop #2100  
 245 Murray Lane SW, Building 410  
 Washington, DC 20528  
 E-mail [nbafprogrammanager@dhs.gov](mailto:nbafprogrammanager@dhs.gov)

**Re: Comments on the National Bio and Agro-Defense Facility (NBAF), Draft Environmental Impact Statement (DEIS), Federal Register, Vol. 72, NO. 146, 31 July 2007**

Dear Mr. Johnson:

The Blue Ridge Environmental Defense League appreciates the opportunity to provide the following comments concerning the Draft Environmental Impact Statement (DEIS) for the National Bio and Agro-Defense Facility (NBAF). The League's founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. We have several hundred members and represent over 40 chapters residing in the southeast area of the United States.

1|2.0 The Department of Homeland Security states that this facility is needed in order to conduct research on animal diseases. Red flags are raised when the Department of Homeland Security acknowledges that 10% of these diseases have no vaccines, treatments or cures. There are twenty-four, Level 3 labs located in North Carolina completely capable of doing the same research on animal diseases. Additionally, the State Laboratory of Public Health operates several BSL-3 facilities with bio-terror response capability.

Red flags are raised again when it we learn that this facility is exempt from the federal Freedom of Information Act (FOIA). A true disease research facility requires open scientific debate and peer review. The FOIA exemption is doubly concerning as it successfully cuts out the public's right to obtain existing, unpublished records, and learn about what its government is doing.

Red flags are raised again when one looks at the two other locations that were proposed for this facility: Lawrence Livermore Laboratories (LL/CA) and Los Alamos National Laboratory (LANL/NM), the nation's two nuclear weapons labs. At the time the facility was proposed for Los Alamos, I was living in New Mexico, and I watched as citizens from around the state fought vehemently against the siting of this facility. People asked why a so-called "center for research on animal diseases" was proposed to be built at the

Comment No: 1 Issue Code: 2.0

DHS notes commentor's concern that NBAF not become involved in bioweapons research. Chapter 1, Section 1.1 of the NBAF EIS clearly identifies NBAF's mission as defensive which would preclude involvement in offensive bioweapons research or development. The international treaty known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies.

Dayton, Susan

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NCD008

1 cont.  
2.0

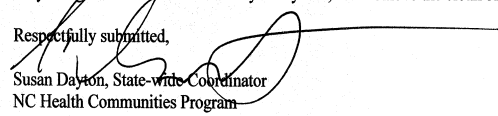
nation's premier nuclear bomb factory. Tonight we ask this same question as we are deeply troubled by the Department of Homeland Security's lack of public transparency.

The indications are strong that the National Bio and Agro-Defense Facility (NBADF) is really a Biological Weapons Laboratory in Disguise (acronym: "BWLID"). Why else would this proposal be administered by the US Department of Homeland Security instead of the Department of Agriculture? The Homeland Security Act transferred biological and chemical weapons programs to the Department of Homeland Security. If this is true, the Department of Homeland Security is in violation of the International Biological Weapons Convention of which the United States is a signatory.

The League stands firm in its conviction that the building of a biological weapons lab is not in keeping with our country's mission, and that any such facility should not be built in Butner, NC, in Georgia, in Mississippi, in Texas – or at Plum Island, New York. It should not be built, not here, not there, not anywhere.

Our final message to the Department of Homeland Security, tonight, is our request to you to remove the FOIA exemption in the spirit of openness and public transparency. If this is truly an agricultural research lab as you say it is, then remove the cloak of secrecy.

Respectfully submitted,

  
Susan Dayton, State-wide Coordinator  
NC Health Communities Program



De Jong, Nellie

Page 1 of 1

WD0332

**From:** Nellie De Jong [REDACTED]  
**Sent:** Monday, August 18, 2008 4:49 PM  
**To:** NBAFProgramManager

1|25.0; We don't want the lab here in NC, or anywhere. Just stop.  
 2|21.3; We do not want our lives, our children, our livestock, our water to  
 be at risk, contaminated, and infected.  
 Please  
 We don't want the lab in NC!!!!!!!!!!!!

Comment No: 1                      Issue Code: 25.0

DHS notes the commentor's opposition to the NBAF.

Comment No: 2                      Issue Code: 21.3

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 an accidental or deliberate pathogen release. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols 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.

Dean, Justin

Page 1 of 1

WD0579

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**From:** Justin Dean [REDACTED]  
**Sent:** Sunday, August 24, 2008 2:03 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Athens, GA

1| 24.2 | As a lifelong resident of [REDACTED] GA, I fully support NBAF coming to Athens.

NBAF would be a great asset to Athens as it would be close to the University and could potentially work with the University in its research.

2| 15.2 | Economically it would be good as it would bring more money to the area as well as create new jobs.

3| 8.2 | I know they wouldn't study the same things, but if they needed assistance from the CDC, it's only an hour drive away from Atlanta where the CDC is headquartered.

cont. | 1| 24.2 | Athens would be a great fit for NBAF.

Justin Dean  
[REDACTED] GA

Comment No: 1                      Issue Code: 24.2

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

Comment No: 2                      Issue Code: 15.2

DHS notes the commentor's support for the South Milledge Avenue Site Alternative. The economic effects of the NBAF at the are included in Section 3.10.3. Labor income during construction is projected at approximately \$150 million while operation of the NBAF would generate approximately \$28 million in wages annually.

Comment No: 3                      Issue Code: 8.2

DHS notes the commentor's statement.

Dees, Melinda

Page 1 of 1

WD0273

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**From:** Melinda Dees [REDACTED]  
**Sent:** Thursday, August 14, 2008 11:39 PM  
**To:** NBAFProgramManager  
**Subject:** Flora Bio Lab

1/24.5 I am a citizen of [REDACTED] and can say Flora would be a great place to locate a business. Employees would be easy to access and the area is growing by leaps and bounds, yet it is some what "rural". We welcome new jobs to our area. Yazoo county is within just a few miles of Flora and I hope this lab becomes a reality.

Melinda Dees  
[REDACTED]  
[REDACTED] MS [REDACTED]

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

DeGennaro, Matt

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WD0858

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**From:** [REDACTED]  
**Sent:** Monday, August 25, 2008 9:37 PM  
**To:** nbafprogrammanager  
**Subject:** DEIS Comments for Athens GA  
**Attachments:** DEIS Comments 8-25-08E.doc

Dear Mr. Johnson,

Please include the attached word document in the formal comments on the NBAF DEIS for Athens, GA.

Thank you,

Matt DeGennaro

DeGennaro, Matt

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WD0858

August 25<sup>th</sup> 2008

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

Matt DeGennaro

GA, [REDACTED]

Dear Mr. Johnson,

I would like to submit the following comments to be placed on the record for the Final NBAF EIS for the Athens, GA site:

As a resident of [REDACTED] GA, I reside approximately 6 miles from the proposed site. The issue of NBAF has only been recently addressed in the local media, and many residents of Oconee have no idea of the scope or the magnitude of the proposed NBAF. The Oconee County Board of Commissioners has not taken a formal vote on the project, even though the proposed site is adjacent to the county line.

1| 5.2 The world's largest BSL-4 lab should not be placed on 66 acres of unique and distinctive  
2| 13.2 pastureland located between a Botanical Gardens and Whitehall Forrest. It's very clear it is  
completely out of character with the area. It is not only my opinion that this is the wrong place  
for NBAF – it is also inconsistent with the Oconee County Future Land Use Map, specifically  
with regard to **Character Areas**. According to a document entitled "Community Assessment –  
Volume 1 Issues and Opportunities, the definition of **Character Areas** is as follows:

3| 6.2 "The Department of Community Affairs' (DCA) requires the identification of character areas  
covering the entire community including areas requiring special attention, and existing  
community sub-areas for which plans have already been prepared. A list of recommended  
character areas are provided in the State Planning Recommendations for suggestions. The  
recommended character areas may be represented wither as a separate map or as an overlay  
on the Existing Land Use Map. The "Local Planning Requirements," dated May 1, 2005  
describes what a character area is in Chapter 110-  
12-.09.

"Character Area" means a specific geographic area within the community that:  
Has unique or special characteristics to be prepared or enhanced (such as a  
downtown, a historic deistrict, a neighborhood, or a transportation corridor);  
Has potential to evolve into a unique area with more intential guidance of  
future development through adequate planning and implementation (such as

Comment No: 1 Issue Code: 5.2

DHS notes the commentor's opinion. 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: 2 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the site to the State Botanical Garden/Whitehall Forest Important Bird Area (IBA). As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden/Whitehall Forest IBA. Terrestrial, aquatic, and rare and endangered species that occur in the vicinity of the proposed NBAF are addressed in Sections 3.8.3.1.3, 3.8.3.1.4, and 3.8.3.1.5 of the NBAF EIS. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden/Whitehall Forest IBA. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the Botanical Garden and the Whitehall Forest IBA. Mitigation measures would include the use of low impact development (LID) techniques, which would minimize the potential for adverse impacts associated with stormwater runoff.

The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention (Centers for Disease Control and Prevention) in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction. Construction would occur primarily on pasture areas that lack trees. The project would impact a small portion (0.2 acre) of the forested area, and would impact a minimal number of trees.

Trees would not be removed from the remaining forested areas.

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 and loss of open space 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 specific design of the NBAF including its physical configuration will be determined during the final design phase.

DeGennaro, Matt

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*a strip commercial corridor that could be revitalized into a more attractive village development pattern); or*

*Requires special attention due to unique development issues (rapid change of development patterns, economic decline, etc.).*

*Each character area is a planning sub-area within the community where more detailed small-area planning and implementation of certain policies, investments, incentives, or regulations may be applied in order to preserve, improve, or otherwise influence its future development patterns in a manner consistent with the community vision.*

3 cont.| 6.2

*The following is a list of potential character areas, all of which include public and institutional uses. Many of these have been preliminary mapped, although several will have to be further developed during the Community Agenda portion of the Plan.*

*Agricultural Preservation*

*Areas where active agricultural and very low density residential in large-lot subdivisions will be preserved.*

*Rural Places*

*Areas that will retain their rural heritage and very low density residential character.*

*Country Estates*

*Large lot homesteads dispersed with "gentlemen and estate" farms, compatible agricultural activities.*

*Suburban Living*

*Low density residential areas, primarily single family detached.*

*Neighborhood Village Center*

*Small scaled local serving retail and services geared to meeting the convenience needs of nearby neighborhoods.*

*Community Village Center*

*Larger scaled retail and services geared to meeting the convenience needs of several neighborhoods or portions of the county. Housing may be an accessory use within this character area.*

*Cities—Watkinsville, Bishop Bogart, North High Shoals*

*A mix of uses that address the unique aspects of each city.*

*Civic Center*

*The mixed use area within the unincorporated county that includes many of the county's institutional uses and major shopping facilities, and potentially higher-density housing.*

*Technology Gateway*

*A mixed use area primarily office with research and development businesses in nature that capitalizes on its major transportation assets and market location. Housing may be an accessory use within this character area.*

*Workplace Center*

*Large scaled employment generators, such as office, distribution and industrial. Housing may be an accessory use within this character area."*

DeGennaro, Matt

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According to the Future Development Map:

<http://www.oconeecounty.com/Government/StrategicPlanning/Strategic%20PDFs/FutureDevelopmentMap2030.pdf>

3 cont.] 6.2 **THE AREA ADJOINING NBAF IN OCONEE COUNTY IS DEFINED AS “COUNTRY ESTATES” NOT “TECHNOLOGY GATEWAY” AND IS THEREBY INCONSISTENT WITH THE COMMUNITY’S LAND USE.** The Oconee County Government should have been taking steps to make sure their community is protected according to the plan, which was just released last summer.

4] 4.2 For a project of this magnitude, a *site selection study* should have been performed *prior* to “requests for expressions of interest”. An environmental impact study should have been drafted as one of the first steps in the process, to identify the safest and best possible site for the world’s largest BSL-4 lab. “Interest” in a project should have **little weight** in this endeavor and should be weighed accordingly. (I may be interested in constructing a rocket launch pad in my backyard, but that doesn’t make it the best or safest place)

5] 19.2 Also, at a February 18<sup>th</sup> “Town Hall” meeting, the DHS informed the community that there would “**no human quarantine**” in the case of an accidental or intentional release of a pathogen from NBAF. Yet in Table 3.8.9-1 on page 3-216, we read that some of the plans involving a FMD outbreak may “*restrict human travel, activities, equipment and other property being moved out of the infected zone or the surveillance/movement control zone*”

6] 26.0 **PLEASE EXPLAIN IN DETAIL IN THE FINAL EIS ALL QUARANTINE - AND OR SURVEILLANCE/MOVEMENT CONTROL ZONES – THAT WOULD BE IMPOSED ON THE COMMUNITY FOR THE ACCIDENTAL OR INTENTIONAL RELEASE OF PATHOGENS FOR EVERY “DISEASE OF INTEREST” SLATED FOR STUDY AT NBAF. PLEASE DETAIL ALL QUARANTINE - AND OR SURVEILLANCE/MOVEMENT CONTROL ZONES – FOR HUMANS. PLEASE DETAIL ALL QUARANTINE - AND OR SURVEILLANCE/MOVEMENT CONTROL ZONES – FOR ANIMALS (LIVESTOCK, WILDLIFE AND PETS .)**

The following is a compendium of e-mail exchanges and writings I would like to submit for the record to demonstrate how little the surrounding communities knew of the NBAF project in 2007 - :

7] 27.0 The first I read of NBAF was in a July 12, 2007 Athens Banner-Herald story: “*UGA site finalist for biodefense lab -But does state have political clout to bring facility home?*” by higher education reporter Rebecca Quigley. In it we read:

*“UGA staff will review the South Milledge site to make sure there aren’t any problems or environmental issues that could hurt the proposal and also will step up efforts to meet with area residents to make sure they are comfortable with plan, Lee said.”*

Comment No: 4

Issue Code: 4.2

DHS notes the commentor’s concerns regarding the procedures for site selection and NBAF EIS preparation. 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 (DHS, U.S. Department of Agriculture [USDA], and Department of Health and Human Services [HHS]) 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. 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 a range of reasonable alternatives for locating, constructing and operating the NBAF and the No Action Alternative. As summarized in Section 3.1, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives.

DHS notes the commentor’s concerns regarding the extent of public participation in the site selection process, which is described in Section 2.3.1. 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. All comments received during the 60-day comment period on the NBAF Draft EIS, both oral and written, were given equal consideration in finalizing the NBAF EIS, regardless of how they were submitted. DHS’s responses to those comments are included in this Comment Response Document.

Comment No: 5

Issue Code: 19.2

DHS notes the commentor’s request for information on the provisions of the USDA emergency response plan for FMD. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the South Milledge Avenue 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, to include agricultural livestock. 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. Emergency response plans will include the current USDA emergency response plan for foot and mouth disease (FMD) which does not include



provisions for human quarantine.

Comment No: 6                      Issue Code: 26.0

DHS notes the commentor's concern. A site-specific emergency response plan would be developed and coordinated with the local emergency management plan regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF. The type of, duration, and geographical extent of quarantine would be determined by the appropriate authorities depending on the pathogen released and contamination level. Section 3.2 discusses land use and visual.

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. Section 3.2 discusses land use and visual resources for each site alternative.

Comment No: 7                      Issue Code: 27.0

DHS notes the information submitted by the commentor. 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. 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.

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 of the NBAF EIS.

DeGennaro, Matt

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WD0858

I wrote the following e-mail to Athens Banner-Herald Editor-In-Chief Jason Winders and reporter Rebecca Quigley that same day:

*"Mr. Winders,*

*Do you have any intention of reporting upon the history of Plum Island in your coverage regarding the movement of the facility to Athens? I strongly feel it is your obligation to inform local citizens of just what exactly happens at a Biodefense Lab.*

*Thanks,  
Matt*

*Below is an Editorial from the October 17th New York Times.*

7 cont. | 27.0

*Island Fever  
By MICHAEL CHRISTOPHER CARROLL*

*Published: October 17, 2004*

*Bellmore — This summer, the Plum Island Animal Disease Center off the east end of Long Island suffered two outbreaks of the foot-and-mouth virus, one of many microbes researched and stored there. Despite letters from federal, county and town officials, researchers from the Department of Homeland Security and the Department of Agriculture failed to disclose the outbreaks, which took place in June and July, until nearly a month after the second occurrence. The public learned of them only after an anonymous tip reached the ears of a reporter.*

*While the virus can cause illness in humans, it is not fatal. But these latest accidents raise the specter of a future outbreak of other germs with lethal consequences. They also represent another instance in a long history of failed and belated disclosures at Plum Island. Unless changes are made, the government should close the lab.*

*Plum Island has a long and checkered history. It began as the brainchild of a German biological warfare scientist, Erich Traub, who was secretly smuggled into the United States in 1949 to perform biological weapons research for the Central Intelligence Agency, the Army and the Navy. The laboratory was established in 1954 by the Army to research exotic germs for use against enemy food supplies.*

*In the mid-1950's, the Army turned over control of Plum Island to the Department of Agriculture, which in turn relinquished much of it to the Department of Homeland Security last year. A number of the germs researched on Plum Island are dangerous to humans and animals and some are lethal, including the mosquito-borne Rift Valley fever virus, which causes hemorrhagic fever akin to the Ebola virus and killed 600 people in Egypt in 1977 and 1978.*

*During the 1980's and early 1990's, Plum Island was charged with more than 260 violations of workplace safety law violations by the Occupational Safety and Health Administration, including improper disposal of virus syringes and radioactive cobalt-60, unlabeled and mislabeled hazardous chemical containers and workers bitten and trampled by test animals. In addition,*

DeGennaro, Matt

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according to the Environmental Protection Agency, from the mid-1990's to 2002 there were violations of state and federal environmental laws, including illegal animal sewage discharges into local waters under the Clean Water Act. The New York State Department of Environmental Conservation described the environmental pollution as troubling, and in December 2002, the island made the National Resources Defense Council's "Dirty Dozen" list of the 12 worst polluters in New York and New Jersey.

After the Sept. 11 attacks, a file with information on Plum Island was found by American forces in Afghanistan in the Kabul residence of Sultan Bashiruddin Mahmood, a former nuclear scientist from Pakistan whom American officials have identified as an associate of Osama bin Laden. Last year, the Government Accountability Office, the investigative arm of Congress, found that laboratory officials "have not adequately controlled access to the pathogens."

Ostensibly in response to this and concerns raised by elected officials, in July Plum Island bolstered the small 24-hour detail provided by a private security firm with part-time federally trained armed guards. Plum Island administrators claim that the laboratories are as safe "as a federal courthouse." They stress that the scientists work only on animal pathogens, particularly diseases that affect farm animals. They say that Plum Island is well protected, and that they meticulously detail biological safety and security practices to reporters with whom they've pledged to be forthright about problems that arise. They boast on their Web site that they are "proud" of their safety record.

But the foot-and-mouth outbreaks that occurred this summer raise important questions: How did it happen? Were proper safety measures followed? What is being done to prevent it from happening again?

To address some of these problems, several security measures should be taken. First, armed couriers should be employed to transport the foreign germs that arrive at nearby international airports and are carried along Connecticut and New York roads. Moreover, emergency first responders like county fire and police officials should be notified of each trip and be properly equipped and prepared to respond to a biological accident or terrorist attack. Second, the Department of Homeland Security must enforce a no-flight zone over Plum Island. And third, the department must re-establish full federal control of the island. Plum Island's biological containment, security, sewage and water systems are now run by a private contractor, but the work being done there is too dangerous to be in private hands.

By contrast, Plum Island's sister laboratory in Ames, Iowa, holds less dangerous germs and it is not privatized. In fact, in 2003, Senator Tom Harkin of Iowa blocked an effort to install private contractors there. The Ames laboratory, he said, is "a vital function of the federal government, and it should remain the responsibility of federal employees." New York's elected officials should follow Mr. Harkin's lead.

Until these steps are taken, Plum Island will remain a threat to its neighbors and a soft target for terrorism. The scientists at Plum Island need to recognize that their laboratory needs an overhaul, and our elected leaders need to force real change there, before we all have to pay the price.

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Michael Christopher Carroll is the author of "Lab 257: The Disturbing Story of the Government's Secret Plum Island Germ Laboratory."

[http://www.nytimes.com/2004/10/17/opinion/opinionspecial/17Llcarroll.html?ei=5070&en=606159e78c95ac23&ex=1184385600&pagewanted=print&position =](http://www.nytimes.com/2004/10/17/opinion/opinionspecial/17Llcarroll.html?ei=5070&en=606159e78c95ac23&ex=1184385600&pagewanted=print&position=)"

I received the following response from Rebecca Quigley on 7/16/07:

"Thanks for writing, Matt.

I understand your concern and am aware of the Plum Island situation. We will keep your inquiry in mind.

Cheers,

Rebecca

7 cont.| 27.0

Rebecca K. Quigley

Higher Education Reporter

Athens Banner-Herald

706-208-2228 (desk)

706-208-2246 (fax)

[rebecca.quigley@onlineathens.com](mailto:rebecca.quigley@onlineathens.com)"

To which I replied on the same day:

"Thanks for your response, Rebecca.

I sincerely hope you will do far more than keep my "concern" "in mind". This is not about me or my concerns.

All the coverage thus far on the NBAF – a facility that will house the world's most deadly diseases and is a potential terrorist target - has been basically centered on the opinions of the University, local economic organizations, and two political hopefuls. I would call this coverage "reporting", but the recording of a person's quotations is better defined as stenography. There has been no reporting on what impact the NBAF will have on the community. The community has no way to judge whether this is "good" or "bad" because they have zero information about just what a bio safety level 4 lab is, or its history at Plum Island.

Beside these extremely relevant safety concerns, it may be of interest to the community to look at just how many of these much ballyhooed jobs are being offered by this proposal. In Dum,

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*Wisconsin - a former contender for the NBAF - The DHS called for the NBAF to come fully staffed; basically all the jobs will be filled by everyone who works at the current Plum Island lab. The University there was offered NO contract to run the facility. Will the Athens-Banner Herald be reporting on this? And is it the same deal here?*

*There was once a law that required that foot and mouth disease could only be studied at Plum Island, due to it being located offshore. That law was changed in the 1990s, but why? The Department of Agriculture's website claims that "Today, modern biocontainment facility construction and rigorous biosafety operational standards allow such work to be safely done without fear of virus escape to the environment or harm to animal and/or public health.", but provides no specifics - especially with regard to the NBAF. Will the Athens Banner Herald be reporting on this?*

*Has there been a risk analysis done by UGA? What about the safety record of Plum Island? How often will these diseases be transported, and what will they be transported in? Are animal rights activists going to target the facility? Is it a good idea to put this right on the Oconee River?*

*Homeland Security in the next year will be looking to see what happens with studies of environmental impacts and community acceptance in its final five locations. The Banner-Herald yesterday endorsed the lab as a dream come true, without any apparent investigation of this project. How is the community to act with informed intelligence about this issue if journalists are turned into cheerleaders?*

*I am forwarding this e-mail to The Oconee Enterprise, The Flagpole and The AJC in the hope that this might be covered elsewhere, as the Athens Banner Herald's obvious bias has affected the reporting of this issue. You have done an outstanding job of recording the ecstatic responses of a select few, but that is neither journalism nor the news. That's marketing. The DHS and UGA all have public relations people assigned to task of promoting the NBAF. Since The Herald has so far not done any real reporting, the community is left with nothing.*

*Thanks,  
Matt DeGennaro"*

To which she responded on the same day:

*"I have reported on what the lab would involve when it first was in the news. We have written about what BSL level 4 means and also have related it to the Animal Health Research Center and the troubles it has gone through to get built, and what members of the community thought about that.*

*It is very difficult proposition to write stories that weigh heavily on the scare factor, esp. Plum Island, without being biased in the other direction, especially before it was known whether Athens was to be a finalist.*

*Now that the South Milledge site is a finalist, I have been planning a community response story for Thursday's paper. If you know anyone who lives down there or who frequents the botanical gardens, please have them contact me tomorrow.*

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Rebecca K. Quigley

Higher Education Reporter

Athens Banner-Herald

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[rebecca.quigley@onlineathens.com](mailto:rebecca.quigley@onlineathens.com)

To which I responded: (7/16/08):

"Rebecca,

Thanks for writing me back.

I have been trying in vain to use the search function on the Athens Banner Herald's website to find the article you are referring to. I've been typing in "NBAF" and have been getting no articles that mention what a BSL 4 is or how it's been related to the troubles over getting the Animal Research Center built. I don't know if it's me or the search engine that's at fault. Can you please provide me with a link to the story or stories you are referring to?

7 cont. | 27.0

I am in no way insinuating that this story be covered with a slant towards a "scare factor". I am just simply asking why it is not being fully covered. There are the people who want the NBAF built here, who we have heard from. There is the community, which we will hear from in Thursday's paper. And then there are the cold objective facts of just what is being proposed. All the questions I posed in the earlier e-mails were asked in an effort to get at these facts. At least two other communities have opposed the NBAF. That's not something to be reported on in an effort to scare people – that's a fact.

I do not personally know anyone who lives right near the proposed site. I would imagine their opinion would be indifferent at best, as they have had no easy access to an objective source of information over what the NBAF is. I would suggest that you extend your focus a little further that people in a 5 mile radius, as something of this magnitude affects the entire community of both Athens and Oconee County. (You might want to talk to the gentleman who run Peppino's Pizza. His business is literally right across the street on Whitehall Road.)

Again, this should not be about any "scare factor", it should just be about what is going on. This whole NBAF issue seems to be an example of people in power spinning the facts, before the facts were even reported. Again, how can anyone in the community judge when they have not been informed?

I look forward to your coverage.

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Thanks,  
Matt”

To which she responded (7/16/07):

“I’m sorry Matt. I can’t help it if people don’t try to inform themselves beyond what I have the space to print. I will try to find those old stories for you --- our search function isn’t a very good one. Little would come up by searching “NBAF” because that’s a simplified abbreviation that I don’t use. I always use “NBADF” because “defense” is a separate word, but never in print.

Rebecca K. Quigley

Higher Education Reporter

Athens Banner-Herald

706-208-2228 (desk)

706-208-2246 (fax)

[rebecca.quigley@onlineathens.com](mailto:rebecca.quigley@onlineathens.com)”

In the meantime – I was trying to contact the consortium for information about NBAF. Under the heading “Find Out More” on their webpage they listed [nbaf@uga.edu](mailto:nbaf@uga.edu) as the email address to send queries to. On 7/16/07 – I wrote the following to that address:

“Hello,

*I was wondering if the NBAF proposal includes a specific amount of jobs that would be required to be filled if in fact the facility is built here. I have been hearing that having the NBAF here wouldn’t actually create any jobs, as as they would all be filled by the current staff of Plum Island.*

Thanks,  
Matt DeGennaro”

I received the following in response:

“This is an automatically generated Delivery Status Notification

Delivery to the following recipient failed permanently:

[nbaf@uga.edu](mailto:nbaf@uga.edu)

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*Technical details of permanent failure:**PERM\_FAILURE: SMTP Error (state 13): 550 <[nbaf@uga.edu](mailto:nbaf@uga.edu)>... No such mailbox"*

I tried several more times and received the same "No such mailbox" error reply.

**HOW COULD THE CONSORTIUM BE INTERESTED IN INFORMING THE COMMUNITY ABOUT NBAF IF THEY DIDN'T EVEN TAKE THE TIME TO PROPERLY SET UP AN EMAIL ACCOUNT FOR PUBLIC INQUIRY?**

I wrote to Terry Hastings – the consortium media contact on 7/16/07. The exchange is as follows:

"Dear Ms. Hastings,

I addressed this question to the [nbaf@uga.edu](mailto:nbaf@uga.edu) address, but it was returned ("no such mailbox"). I was wondering if you could answer it for me.

I was wondering if the NBAF proposal includes a specific amount of jobs that would be required to be filled if in fact the facility is built here. I have been hearing that having the NBAF here wouldn't actually create any jobs, as as they would all be filled by the current staff of Plum Island.

Thanks,  
Matt DeGennaro"

"Matt,

It is our understanding that the NBAF will employ from 250 to 350 people in research/science jobs as well as support jobs, ranging from research technicians to office staff to facility support and more. No exact number or type of jobs has been provided. It is certainly possible that some of the Plum Island staff would move from that facility to take jobs at the new NBAF. However, it would be highly speculative at this point to estimate how many and which jobs would be filled by those people, as the facility will not be completed until 2013-2014.

As we get more information, we will pass it along to our community. Thank you for your question. Please let me know if you have other questions.

Terry Hastings"

"Terry,

Thanks for writing me back. I do have two other questions.

If no exact number or type of jobs have been provided to UGA, where does the 250-350 number come from? Also, if it is highly speculative to estimate just how many and what kind of jobs

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will be provided by the NBAF, on what information are you basing your understanding that they will be "research/science jobs as well as support jobs, ranging from research technicians to office staff to facility support and more"

Thanks,  
Matt DeGennaro"

"Matt,

DHS has said that 250 to 350 people would be employed by NBAF. No list of jobs has been provided, but it is clear that operating a facility of this nature would require employing people in a range of jobs. That is not speculation; what is speculative is guessing how many jobs and which ones would be filled by Plum Island employees six or seven years from now.

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For more information, see Staffing on [http://www.dhs.gov/xres/labs/gc\\_1181073261627.shtm](http://www.dhs.gov/xres/labs/gc_1181073261627.shtm).

I hope this answers your questions.

Terry Hastings"

---

On July 17, 2007 Athens Banner-Herald Editor-In-Chief Jason Winders wrote on his blog (in part):

*"You could just feel it coming.*

*Only moments after Athens ended up on the shortlist for the National Bio and Agro-Defense Facility, my inbox was flooded with the usual suspects begging us to "do our homework" and "tell the truth" about the proposed facility. Thanks for the heads up, folks"*

For some reason, one was not allowed to comment on the blog. I informed Winders of [this in an e-mail on 7/18/07](#). The exchange is as follows:

*"Mr. Winders,*

*The comments on your blog seem to be broken. I was wondering if you might post the following.*

*Thanks,  
Matt DeGennaro*

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First off, under the "Find Out More" page on the UGA "valuable site for reference" there is an e-mail address ([nbaf@uga.edu](mailto:nbaf@uga.edu)) which bounces back your e-mail. Want to "find out more?" You'll get your mail returned with the message "No Such Mailbox"

Secondly, I am not one of the "usual suspects" you refer to. I moved to Oconee County almost 3 years ago, and this is the first time I have written to you or any other local newspaper.

Regarding safety concerns, I think you are confusing what you call "fear-mongering" with the simple reporting of facts. So far, The ABH has only reported on people's reactions to the proposal - but very little about just what the NBAF is. To glibly accuse the community of playing a "fear card" when all they ask of their local paper is an objective report on what is being proposed is shameful. People are looking to your paper for information about the NBAF, only to find ecstatic reactions, pie in the sky predictions and unsubstantiated promises. The hype generated about the NBAF has become the story.

So what is the NBAF?

The NBAF that is being proposed for the corner of South Milledge and Whitehall is actually a relocation of the Plum Island Animal Disease Research Center (PIADC). Diseases studied there are foot-and-mouth disease, classical swine fever, and vesicular stomatitis virus. The PIADC was a Bio Level 3 Lab, The NBAF will be a Bio Level 4 and will provide a place for scientists to research zoonotic diseases such as the West Nile Virus, avian influenza and anthrax. According to UGA's site, "**BSL-4** labs are used to study agents that pose a high risk of life-threatening disease for which no vaccine or therapy is available. Lab personnel are required to wear full-body, air-supplied suits and to shower when exiting the facility."

Once upon a time, there was a law that prohibited studying foot-and-mouth disease on the United States mainland in order to prevent an outbreak. The PIADC was the only laboratory in the U.S. to do this, as they were located offshore.

But "In 1990, the original 1884 statute was amended, 21 U.S.C. 113a, to authorize the Secretary of Agriculture to issue a permit for FMD live virus work on the U.S. mainland when necessary and in the public interest." And I guess that permit is about to be issued for the NBAF. According to this USDA document, "Today, modern biocontainment facility construction and rigorous biosafety operational standards allow such work to be safely done without fear of virus escape to the environment or harm to animal and/or public health."  
(<http://www.usda.gov/documents/07title7.doc>)

As a side note, it's interesting to see the Department of Homeland Security say this in a June 6, 2003 Fact Sheet regarding the transition of Plum Island:

"The island setting and biocontainment facilities of PIADC permit safe and secure research. PIADC biocontainment facilities operate at a Biosafety Level 3. DHS has no plans in the near or long term for a Biosafety Level 4 facility"

[http://www.dhs.gov/xnews/releases/press\\_release\\_0176.shtm](http://www.dhs.gov/xnews/releases/press_release_0176.shtm)

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*Plum Island did not have the best of safety records. This is not an opinion, this is a fact. From a 2003 article from The Scientist:*

*"The probe revealed that USDA officials once allowed eight foreign scientists free rein in the biocontainment area where diseases are stored, even though they had never undergone mandatory federal background checks. Foreign students attending classes at the facility never underwent such checks either. Because guards carried unauthorized firearms, local police departments refused to agree to provide assistance during potential bioterrorist attacks."*

*It's not fear-mongering to report that the previous home of the NBAF was a potential terrorist target, it is a fact: "After the Sept. 11 attacks, a file with information on Plum Island was found by American forces in Afghanistan in the Kabul residence of Sultan Bashiruddin Mahmood, a former nuclear scientist from Pakistan whom American officials have identified as an associate of Osama bin Laden. Last year, the Government Accountability Office, the investigative arm of Congress, found that laboratory officials "have not adequately controlled access to the pathogens.""*

*<http://www.nytimes.com/2004/10/17/opinion/opinionspecial/17Lcarroll.html?ex=1184558400&en=730afc1e19fa66f0&ei=5070>*

*And regarding all those 250-300 "high paying" jobs we keep hearing being ballyhooed about? Well, that's what I was writing the UGA NBAF site about. After my e-mail was bounced back, I contacted a Ms. Hastings, who is listed on the site as a media contact and was kind enough to write me back. I wanted to find out where the 250-300 number originated, and if what other towns were saying was true - that having the NBAF here wouldn't actually create any jobs, as they would all be filled by the current staff of Plum Island. Here is the response I received:*

*"It is our understanding that the NBAF will employ from 250 to 350 people in research/science jobs as well as support jobs, ranging from research technicians to office staff to facility support and more. No exact number or type of jobs has been provided. It is certainly possible that some of the Plum Island staff would move from that facility to take jobs at the new NBAF. However, it would be highly speculative at this point to estimate how many and which jobs would be filled by those people, as the facility will not be completed until 2013-2014."*

*When I responded with:*

*"If no exact number or type of jobs have been provided to UGA, where does the 250-350 number come from? Also, if it is highly speculative to estimate just how many and what kind of jobs will be provided by the NBAF, on what information are you basing your understanding that they will be "research/science jobs as well as support jobs, ranging from research technicians to office staff to facility support and more"*

*I received this:*

*"DHS has said that 250 to 350 people would be employed by NBAF. No list of jobs has been provided, but it is clear that operating a facility of this nature would require employing people in a range of jobs. That is not speculation; what is speculative is guessing how many jobs and which ones would be filled by Plum Island employees six or seven years from now.*

*For more information, see Staffing on [http://www.dhs.gov/xres/labs/qc\\_1181073261627.shtm](http://www.dhs.gov/xres/labs/qc_1181073261627.shtm)."*

*So the DHS has said that 250 to 350 people would be employed by NBAF, but does not say how many jobs will be staffed locally. There seems to be no guarantee that this would bring any employment to Athens, yet it is reported as such. There is also no guarantee that the 1000 construction jobs will be filled*

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locally or instead by our good friends at Haliburton. Also, it is unclear if UGA will be given a contract to run the NBAF, or if it will run by The Department of Homeland Security.

And the biggest questions of all remain unanswered. Why is the Plum Island Animal Disease Research Center being relocated in the first place? Why is it suddenly O.K. for FMD to be studied on the mainland in a highly populated area? Has there been a risk analysis done by UGA? What about the safety record of Plum Island? How often will these diseases be transported, and what will they be transported in? Are animal rights activists going to target the facility? Is it a good idea to put this right on the Oconee River?

This is not fear-mongering. This is what a newspaper is supposed to do."

Reply:

"Hmmm. I cannot post either. Better get the tech guys involved in this process. Thanks, Matt.

7 cont.| 27.0

J.

**Jason Winders**

Athens Banner-Herald, executive editor"

(NOTE: My comments were never posted)

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On 7/23/07 I wrote to reporter Rebecca Quigley. The exchange is as follows:

"Rebecca,

Did I miss the story you had planned for the community's reaction regarding the NBAF?

Thanks,  
Matt"

Reply:

"No story because no community reaction: everyone I talked to said they didn't know enough yet to comment... they didn't even express any uninformed concern about it. Of course, there aren't many people who live out there... I'll probably follow up once UGA does a public forum.

Rebecca K. Quigley

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**THIS SHOWS THAT ON 7/23/07 THE SURROUNDING COMMUNITY STILL DID NOT KNOW ABOUT NBAF. BY SAYING "THERE AREN'T MANY PEOPLE WHO LIVE OUT THERE" IT ALSO SHOWS THAT THE REPORTER IS UNAWARE OF NEIGHBORHOODS WITHIN A ONE-MILE RANGE OF THE PROPOSED SITS.**

7 cont.| 27.0

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On 7/20/07 to 7/23/07 I had the following correspondence with Terry Hastings and David Lee:

"Hello,

Can you tell me when the next community meeting regarding the NBAF will be scheduled?

Thanks,

Matt"

"Matt,

We are planning some meetings, and when they are definite (dates, places, etc.) we will make them widely known through media and the [www.upa.edu/nbafe](http://www.upa.edu/nbafe) web site and listserv.

Terry"

"Terry,

Is it possible to get a copy of the minutes of the following meetings:

**February 13, 2007**    *Athens Kiwanis Club*

**April 4, 2007**    *University Roundtable*

**June 21, 2007**    *Northeast Georgia Regional Development Center*

**August 17, 2006**    *University Heights Neighborhood Information Session on the Animal Health Research Center and the proposed National*

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*Bio and Agro-Defense Facility*

*Also, according to the Athens Banner-Herald, DHS Homeland Security spokesman Chris Kelly said:*

*"UGA leaders must incorporate feedback from residents within a 60-mile radius of the site and show that they have either received community input or have a specific plan to draw feedback from area residents."*

*What information thus far has been supplied by UGA to the DHS regarding feedback of residents within a 60-mile radius?*

*Thanks,  
Matt"*

*"Hi Matt,*

*As Terry is on the verge of leaving for vacation, she forwarded your email to me.*

*To obtain minutes from the meetings you have listed it will be necessary for you to contact the individual groups directly. We do not have copies of any minutes and I am unsure as to whether or not they exist in each case.*

7 cont.|27.0

*Re the purported Chris Kelly quote, I contacted the NBAF Program Manager as soon as this was brought to my attention, as I was completely unaware of any such requirement (and of course I wanted to be sure that we met any requirements). I was told that this quote was misinformation and that there was no such requirement. Consistent with this instruction, this purported requirement has never been raised by DHS in any of our interactions or during the site visit in April. I have no idea how this misinformation arose.*

*David*

*David Lee, PhD  
Vice President for Research  
University of Georgia  
609 Boyd Graduate Studies Research Center  
Athens, GA 30622-7411*

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706-542-5969 (voice)  
706-542-5978 (fax)

"Hi David,

Below is the article I was referring to. The Kelly quote is the last line. Since you say this information is wrong, can you tell me what requirements UGA has regarding community feedback?

Thanks,  
Matt

7 cont.| 27.0

## **Officials inspect biodefense sites**

### **Athens lab proposed**

By Rebecca K. Quigley | [rebecca.quigley@onlineathens.com](mailto:rebecca.quigley@onlineathens.com) | Story updated at 11:55 PM on Wednesday, April 25, 2007

A team of Homeland Security officials inspected two sites in Athens on Tuesday as they consider 17 proposals from 11 states for a new National Bio- and Agro-Defense Facility.

In March 2006, Gov. Sonny Perdue's office, the University of Georgia and the state Department of Economic Development submitted two proposals to homeland security to build the facility on UGA-owned properties off College Station Road and South Milledge Avenue.

The center will provide research and development space to combat bio- and agro-terrorism threats and emerging disease pandemics, especially those, such as avian flu, that can transfer from animals to humans.

Tuesday's visitors, led by James Johnson, head of the U.S. Department of Homeland Security's office of national laboratories, met with representatives of the Georgia Consortium for Health and Agro-Security, led by David Lee, UGA vice president for research.

Sometime next week, the Homeland Security undersecretary will visit the sites, Lee said.

UGA's main proposal offers up a \$13.3 million, 72-acre natural area between the North Oconee River, a federal poultry research laboratory and the Richard B. Russell Research Center off College Station Road.

The team is expected to announce three to five finalists at the end of June and a final site in October 2008. Construction is expected to begin in 2010 and open in 2013.

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*Members of the team refused to comment about Tuesday's visit and their meetings at UGA were conducted behind closed doors because the law allows government officials to discuss real estate acquisition in private, said Homeland Security spokesman Chris Kelly.*

*The team heard presentations from UGA scientists and President Michael Adams, Gov. Sonny Perdue, University System Chancellor Erroll Davis, Athens Technical College President Flora Tydings, Athens-Clarke Mayor Heidi Davison, and representatives from Emory University, the state Department of Economic Development, the Georgia Research Alliance, the Georgia Poultry Federation, Georgia Power Co. and Athens-based animal vaccine company Merial.*

*"What I wanted to convey to them was that this is a good community to live in," Davison said.*

*Davison told the visitors that UGA leaders have done a good job keeping people informed about the proposal and because Athens has a very educated and engaged citizenry, the public has kept a close eye on the proposal and what it will mean for the community, she said.*

*In Perdue's prepared statement to the visitors, he touted Georgia's fast-growing population, the proposed site's proximity to Hartsfield-Jackson Atlanta International Airport, and the plethora of innovations Georgia researchers have made in bio-technology, agriculture and animal and human disease prevention.*

*"I don't think our story was dramatically different" from the materials the consortium submitted so far, Lee said. "(But) I think they wanted to hear it first hand."*

*The visit gave consortium members the chance to demonstrate, in person, how they and other health and agricultural organizations in Georgia have a history of working together on many projects, Lee said.*

*Homeland Security officials briefed the Georgia group about the site selection process and then allowed them to present selling points, including the proposed sites' proximity to a trained workforce and research facilities.*

*The Homeland Security visitors didn't indicate whether they liked Georgia's proposal, but Lee said he wasn't expecting any feedback.*

*The University System of Georgia Board of Regents last week agreed to deed either of the two proposed UGA sites to Homeland Security should federal officials choose a site at UGA.*

*UGA officials have said they plan to partner with Athens Technical College to train some of the workers the facility will need.*

*UGA leaders must incorporate feedback from residents within a 60-mile radius of the site and show that they have either received community input or have a specific plan to draw feedback from area residents, Kelly said.*

7 cont. | 27.0



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Published in the Athens Banner-Herald on 042507  
[http://onlineathens.com/stories/042507/news\\_20070425061.shtml](http://onlineathens.com/stories/042507/news_20070425061.shtml)"

"Matt, the same response from DHS indicated that each situation is different, hence they were not going to set artificial requirements but rather leave it to the better judgement of each consortium. We are now working out our plan. Thanks. David

David Lee, PhD  
 Vice President for Research  
 University of Georgia  
 609 Boyd Graduate Studies Research Center  
 Athens, GA 30622-7411  
 706-542-5969 (voice)  
 706-542-5978 (fax)"

7 cont.| 27.0

**THE CONSORTIUM HAD NO PLAN TO** "incorporate feedback from residents within a 60-mile radius of the site and show that they have either received community input or have a specific plan to draw feedback from area residents". The first meeting that was open to the entire community was held on August 30, 2007. The 4 meetings held prior to this date-

August 15, 2007 Athens-Clarke County and Oconee County Commissioners and Senior Staff

June 21, 2007 Northeast Georgia Regional Development Center

April 4, 2007 University Roundtable February 13, 2007 Athens Kiwanis Club  
 August 17, 2006 University Heights Neighborhood Information Session on the Animal Health Research Center and the proposed National Bio and Agro-Defense Facility

were NOT open to the public.

Yet, Despite lack of community knowledge or acceptance, when the DHS came to inspect the sites six months earlier (April 24, 2007) Mayor Davison told the DHS "that UGA leaders have done a good job keeping people informed about the proposal and because Athens has a very educated and engaged citizenry, the public has kept a close eye on the proposal and what it will mean for the community, she said." (ABH)

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On July 25<sup>th</sup> 2007 I had the following exchange with Athens-Clarke County Commissioners Andy Herod and Doug Lowry:

"Gentlemen,

I was wondering if you had any information on an August 16th, 2006 "University Heights Neighborhood Information Session on the Animal Health Research Center and the proposed National Bio and Agro-Defense Facility"

I am looking for either a transcript or minutes of the meeting, or the e-mail address of someone who might have these. I'm interested in what information has been presented to the community so far by UGA with regards to the NBAF.

Below is an excerpt from a letter I just sent to The Flagpole.

Thanks,  
Matt DeGennaro

"It's interesting to compare the coverage of The Columbia Daily Tribune – the local paper of Columbia, Missouri, a town that was formerly in the running for the NBAF – with that of The Athens Banner-Herald. When Columbia was first discussing the NBAF proposal, residents of the town were informed of a public meeting by their newspaper. On March 21, 2006 – more than a year ago - The Columbia Daily Tribune ran a story titled *"Biomedical Facilities to Be Discussed"*, printing the date and time of the meeting. Two days later they ran a follow-up story *"Defense Lab Plan Spooks Neighborhood"*, which described the community's reaction and included an e-mail address for "Anyone interested in commenting to university officials about proposed research facilities"

The Athens Banner-Herald has covered none of the four meetings listed on the UGA website set up for NBAF information.

In June, 2007, The Department of Homeland Security released a list of eight "diseases of interest" that could be studied at a National Bio- and Agro-Defense Facility. The Columbia Daily Tribune ran them with the headline *"List of Diseases Shows Possible Contents of Lab."* They talked to an animal disease researcher at the University of Missouri, (who said he wasn't even familiar with some of the more unusual diseases on the list) and printed detailed descriptions of the diseases, devoting a paragraph to each.

The Athens Banner-Herald did not report the list of diseases. During the course of reporting about the NBAF, its headlines read *"Senators Hoping Georgia's 'Assets' Will Win Fed Lab"* and *"UGA Chief Likes Biodefense Chances"*. On the editorial pages of The Columbia Tribune, you find columns with titles such as *"Proposed Lab Puts Residents At Risk"*, *"Lab's Safety Rests on Too Many Unknowns"*, and *"Death Lab' Isn't the Growth We Need"*. On the editorial pages of the Banner-Herald you'll read columns titled *"Leaders Should Come Together to Gain*

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Facility" *"Defense Facility Seems a Natural Fit for University"* and *"Biotechnology Dreams Could Become Reality"*

The residents of Columbia were well informed of The Department of Homeland Security visiting potential NBAF sites through their local paper. The visit was mentioned in 4 separate stories in the 13 days before the inspection team arrived on May 10<sup>th</sup> and 11<sup>th</sup>, 2007. A headline in the May 11<sup>th</sup> Tribune read *"Protests Greet Visitors"*. One of the criteria the DHS uses in evaluating proposals is that of "Community Acceptance".

The Athens Banner-Herald only reported on the inspection team after it left.

The newspaper in Columbia printed 8 letters to the editor regarding the NBAF. They were mostly against the site with titles like *"If Laboratory is Unsafe in New York, it's Unsafe Here,"* *"Probably Safe Doesn't Justify Disease Lab Plan"* and *"Short-Term Rewards Not Worth Lab's Risks,"* but they published proponent's views also.

To date (July 25), The Athens-Banner Herald has not published one letter to the editor concerning the NBAF. Jason Winders complains of his inbox being "flooded" with reader's comments. Where are they?"  
(THE LETTER TO THE FLAGPOLE WAS NOT PUBLISHED.)

Reply:

"Hi Matt: Thanks for the email. I do not have a copy, and suspect Doug does not either, as this date is before either of us was elected to the Commission. I would suggest contacting Pat Allen. He is UGA's point-person on this. The ACC manager's office may have something, but I doubt it.

UGA does have a webpage at <http://www.uga.edu/nba/>

Best,

Andy  
Andy Herod  
District 8 Commissioner  
Unified Government of Athens-Clarke County'

\*Matt:  
You'll need to contact Pat Allen at UGA about this University Heights meeting.  
Pat's e-mail is: [patallen@uga.edu](mailto:patallen@uga.edu)

Doug"

I sent a query to Patrick Allen. To which he responded:

7 cont.] 27.0

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"Matt, sorry for the delay in responding. I was out of town on vacation last week.

There are no minutes or transcripts of the meeting – it was an informational session and designed as a 2-way conversation. However, I'll be glad to give you my recollections of the conversations.

The meeting began with an overview by VP of Research David Lee. This same information (and much more than what was covered that evening) is on the NBAF website, [www.uqa.edu/NBAF](http://www.uqa.edu/NBAF). After a rather lengthy Q/A time the group toured the Animal Health Research Center, the Vet School's new BSL3 lab.

7 cont.| 27.0

During the Q/A time there was very little concern expressed over the safety of the facility. The majority of the conversation focused on two areas:

(1) The orientation of the building on the property. Neighbors were concerned that the building would be visible from the neighborhood and cited their disappointment with the placement of the EPA building (adjacent to the proposed site.)

(2) Traffic. Neighbors were concerned with the volume of new traffic on College Station Road.

I'm sure you are aware of a community meeting being organized by the Department of Homeland Security for September 20, 7:00 PM at the GA Center. This will be an opportunity to hear directly from DHS and to ask specific questions and/or express desires or concerns.

Pat Allen

C Patrick Allen  
Director of Community Relations  
Office of Government Relations  
The University of Georgia  
Athens, GA 30602-6407  
706-227-7151  
706-202-9273"

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On 7/31/08 I tried to get a copy of the Carl Vinson financial forecast for NBAF. I wrote to the Associate Director Karen Baynes at the Institute (and cc'ed the following email addresses: [allen@cviog.uga.edu](mailto:allen@cviog.uga.edu), [pou@cviog.uga.edu](mailto:pou@cviog.uga.edu), [trigg@cviog.uga.edu](mailto:trigg@cviog.uga.edu)) The exchange is as follows:

"Ms. Baynes,

I was wondering if I could get a copy of the analysis/study done by The Institute regarding the National Bio and Agro-Defense Facility. I looked online, but suspect I am looking in the wrong place.

Thanks,  
Matt DeGennaro"

"Mr. DeGennaro,

The Institute's work concerning the facility was limited to providing some figures requested within the university. Those are the figures cited at [http://uga.edu/nbaf/about\\_NBAF.html](http://uga.edu/nbaf/about_NBAF.html). **There was no formal, published study.**

Joycelyn Trigg"

"Ms. Trigg,

Thanks for writing back.

Is it possible to obtain the data used to arrive at these figures? I would like to know what data was used in coming up with the figures cited in the statement - "the 20-year impact at \$1.5 billion in wages and salaries and an estimated \$3.5 billion overall economic impact."

Matt DeGennaro"

(No further response from CVIOG)

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On 8/3/07 I had the following correspondence with Sam Fahmy *UGA Public Affairs/News Service*)

"Mr. Fahmy,

I sent the following to the [nbaf@uga.edu](mailto:nbaf@uga.edu) address a few days ago, but so far have received no response. I was wondering if you could help me with my question:

I was wondering if you might provide me with some information regarding the Carl Vinson Institute of Government (CVIOG) analysis done for NBAF.

7 cont.| 27.0

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I was looking for a copy of the analysis, but was told by the institute that "their work concerning the facility was limited to providing some figures requested within the university", and that no formal study was done.

Is it possible to obtain the data used to arrive at these figures? Specifically, I would like to know what data was used in coming up with the figures cited in the statement - "the 20-year impact at \$1.5 billion in wages and salaries and an estimated \$3.5 billion overall economic impact."

Thanks,  
Matt DeGennaro"

"Hello Matt,

7 cont. | 27.0

The NBAF webmaster forwarded me your query, and I'm sorry to keep you waiting for so long. The person who did the analysis is no longer with the university, so now I'm waiting to hear from the co-author. I'm hoping he'll get back to me by the end of the day so that I can give you an answer. I know they used a modeling program known as the Georgia Economic Modeling System (<http://www.cviog.uga.edu/services/research/gems/index.php>), but I'm still waiting to hear what their source data was.

They were right in telling you that the analysis isn't as detailed as full study (for an example of a GEMS study, visit: <http://www.cviog.uga.edu/services/research/gems/healthcare.pdf>).

I'll keep you posted on what I find. Thanks again for your interest.

Sincerely,

Sam Fahmy

*Sam Fahmy*

*Science writer*

*UGA Public Affairs/News Service*

*Hodgson Oil Building, Suite 200N  
286 Oconee Street  
Athens, GA 30602-4999*

*(706) 542-5361*

*sfahmy@uga.edu"*

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“Sam,

Thanks for writing me back so quickly. I'll be looking out for your e-mail.

One other thing - The Flagpole mentioned last week that UGA would be holding a NBAF public information meeting in mid August. Has any date been set yet?

Thanks again,  
Matt”

Hello Matt,

I still haven't heard from my contact at CVIOG, so it's unlikely that I'll be able to get an answer to you today. I'll be out of the office all of next week, but will be checking my e-mail occasionally, and hopefully at least daily. As soon as I hear anything, I'll send the information your way.

The date for the UGA public information meeting hasn't been finalized yet, but the DHS has just announced the details of its scoping meeting. More details can be found at this link: [http://www.dhs.gov/xres/labs/editorial\\_0803.shtm](http://www.dhs.gov/xres/labs/editorial_0803.shtm). As soon as we finalize our meeting date, we'll post it to the Web site, [www.uga.edu/nbaf](http://www.uga.edu/nbaf) and put something out on the listserv.

Thanks again for your interest. I'll be in touch,

Sam

*Sam Fahmy*

*Science writer*

*UGA Public Affairs/News Service”*

Hello Matt,

I've heard back from the Vinson Institute, and have written a summary:

The analysis of the economic impact of the National Bio and Agro-Defense Facility (NBAF) conducted by the UGA Carl Vinson Institute of Government used inputs including the investment required for construction, purchase of equipment, and infrastructure improvements, as well as information on the workforce the facility will require (number and types of jobs, and payroll). Those data were used to model the economic impacts to Athens-Clarke County, the surrounding area, and the state as a whole.

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The analysis was completed using the Georgia Economic Modeling System (GEMS), a county-based economic model of the entire United States created by the CVIOG and Regional Dynamics, Inc. that measures the impact of investments such as the NBAF. In doing so, the GEMS takes into account existing businesses and their locations, population demographics, and transportation infrastructure to forecast the effects the new facility will have on suppliers to that industry and increased demand for services (e.g. dry cleaning, restaurants, retail outlets, etc). The model utilizes population and workforce data from the Bureau of Labor Statistics and the Census Bureau, and county-level economic data on nearly 800 industry categories from the U.S. Department of Commerce.

7 cont. | 27.0

In one sense, the forecast can be seen as a conservative estimate of the impact of the proposed facility since it does not model the impact that would result from related bioscience businesses that might locate or expand in the Athens area. Just as the addition of an auto manufacturing plant to a region, for example, tends to attract auto parts suppliers and other related businesses, NBAF would likely add to the region's reputation as a hub of infectious disease research and attract more bioscience businesses to the region.

Hope this helps,  
Sam"

"Sam,

Thanks for taking the time to look into this. I really do appreciate it.

Unfortunately, these are not the answers I have been looking for. In your summary it reads that the CVIOG analysis used "information on the workforce the facility will require (number and types of jobs, and payroll)."

I have been told that no exact number or type of jobs have been provided by the DHS. Therefore, I was asking how CVIOG arrived at "\$1.5 billion to \$2.5 billion in wages/salaries, and an estimated \$3.5 billion to \$6 billion in overall economic impact." Simply put, if no number or type of jobs have been provided by the DHS, what data was CVIOG using in coming up with this estimate?

If you have any information on the data used by CVIOG, I would appreciate if you would pass it along. I thank you once again for taking the time to look into this.

Matt"

"Hello Matt,

This has taken a little longer than I had hoped, but I wanted to double check to make sure I was right. DHS hasn't given the exact number of people to be employed at the facility, but they have said the facility will likely create between 250 and 350 permanent jobs. Using the conservative estimate of 250 full-time employees, the CVIOG analysis arrived at an estimated economic impact of \$1.5 billion to \$2.5 billion in wages/salaries and an estimated \$3.5 billion to \$6 billion in overall economic impact. Like weather forecasts, economic forecasts always have some degree of uncertainty. But we believe the \$1.5 to \$2.5



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billion figure gives a good sense of the economic impact of the facility. As I mentioned earlier, the figure is likely on the conservative side because it doesn't model the impact of related bioscience businesses that might locate or expand in the area.

I hope this helps.

7 cont.|27.0

Best,

Sam

*Sam Fahmy*

*Science writer"*

On

August 13, 2007 I sent the following to Athens Banner-Herald editorial page editor Jim Thompson, who was heading up a search for new columnists for the newspaper.

"Mr. Thompson,

I would like to submit the following for consideration in the new local columnists search. I am working on another column that details my experience in finding about "all those jobs" NBAF is supposed to bring to the area, but wanted to see if you would be interested in posting columns like the one below for readers to vote on.

Please let me know.

Thanks,  
Matt DeGennaro

It's not easy for someone to "find out more" about the National Bio and Agro-Defense Facility that is being proposed for Athens, GA. A few weeks ago, under the "Find Out More" page on the University of Georgia's informational site regarding the Biodefense lab, the "General Questions" e-mail address bounced back any queries. If you wanted to "find out more", you'd get your e-mail returned with the message "No Such Mailbox".

Jason Winders, executive editor of The Athens Banner-Herald, doesn't seem too interested in providing his readership with any real information either. After an editorial entitled "Biotechnology dreams could become reality" appeared in the July 15th Banner-Herald, Winders mocked his critical readers ("the usual suspects") the next day on his blog for filling his inbox with objections and concerns. Readers who were interested in basic information about the facility were basically told to calm down, and that's it's all going to be O.K...."The site will be announced in October 2008, enough time to "have plenty of opportunity to dig in and start asking the tough questions about what this facility means – both pro and con – to our community." Well, since the whole playing field has been narrowed from 18 sites to 5, and the next event listed on The Department of Homeland Security website's Selection Process is "Complete EIS/Announce site selection" for October 2008, perhaps we should start asking questions now.

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It's interesting to compare the coverage of The Columbia Daily Tribune – the local paper of Columbia, Missouri, a town that was formerly in the running for the NBAF – with that of The Athens Banner-Herald. When Columbia was first discussing the NBAF proposal, residents of the town were informed of a public meeting by their newspaper. On March 21, 2006 – more than a year ago - The Columbia Daily Tribune ran a story titled "*Biomedical Facilities to Be Discussed*", printing the date and time of the meeting. Two days later they ran a follow-up story "*Defense Lab Plan Spooks Neighborhood*," which described the community's reaction and included an e-mail address for "Anyone interested in commenting to university officials about proposed research facilities"

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7 cont.| 27.0

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To date, The Athens-Banner Herald has not published one letter to the editor concerning the NBAF. Jason Winders complains of his inbox being "flooded" with reader's comments. Where are they?

The hype generated about the NBAF has in fact become the story. It's like reporting on a fire by only describing the smoke. The Athens Banner-Herald has done an outstanding job of recording the ecstatic responses of a select few supporters, but that is neither journalism nor the news. That's marketing. The DHS and UGA both have public relations people assigned to task of promoting the NBAF. Since The Banner-Herald has not yet done any real reporting, the people of the community are left with nothing.

On August 14, 2007 – I had the following exchange with Athens Banner-Herald editorial page editor Jim Thompson:

"Mr. Thompson,

This question is in regards to the column entry I sent you yesterday. For the local columnists search, will columns dealing with The National Bio and Agro-Defense Facility be considered? I just wanted to know before I submitted another one.

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Thanks,  
Matt DeGennaro"

"Sure. We'll consider anything on any topic – with the exception of abortion, since the arguments on both sides of that issue have been made repeatedly, and no one's mind is likely to change on the subject.

Jim Thompson"

"Mr. Thompson,

Below is the my second entry in the call for new local columnists. (I was going to write about the potential NBAF jobs, but have not heard back yet from the NBAF programmer.)

Can you tell me if both columns will be posted online for reader feedback?

Thanks,  
Matt DeGennaro

7 cont.| 27.0

You know something's up when you look at their website.

Google up UGA's website on The National Bio and Agro-Defense Facility. You'll be treated to enough sugary pastoral scenes to be thrown into diabetic shock. Three children holding hands in a green field walking towards a herd of cows. An elderly man petting a dog in a green field. More children – this time two young girls, one white and one black – hold hands while flying a kite... in a green field. Lots of smiles, livestock and green. Whatever could be wrong with a proposal that would bring so much joy and interracial harmony to the area?

But if you look a little closer, you may have some questions. First among them might be, just what the hell is a National Bio and Agro-Defense Facility?

Well, the idea for such a project comes from the mind that brought you such hits as the Iraq war, Abu Ghraib, The Patriot Act, and the days long response to Hurricane Katrina. In a 2002, George W. Bush decided that *"Bioterrorism is a real threat to our country. It's a threat to every nation that loves freedom. Terrorist groups seek biological weapons; we know some rogue states already have them....It's important that we confront these real threats to our country and prepare for future emergencies."* This conclusion was probably driven by the anthrax attacks of the previous year. Though the strain of nthrax used was identical to that of one at a Ft. Detrick Army biolab, the crime has remained unsolved. (The FBI file on the case is dubbed "Amerithrax")

So in 2004, the former head cheerleader of the Phillips Academy stickball team signed Homeland Security Presidential Directive 9, which paved the way for the construction of a brand spanking new facility to replace another government germ lab. According to the Department of

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Homeland Security website, the old joint - The Plum Island Animal Disease Center - "is nearing the end of its lifecycle, and is too small to meet the research needs of the nation." They also say that Plum Island, N.Y., does not have Bio Safety Level 4 capabilities. The PIADC is a Bio Level 3 Lab, and some of the diseases housed there are foot-and-mouth disease, classical swine fever, and vesicular stomatitis virus. The new NBAF will be a Bio Level 4 and will provide a place for The Department of Homeland Security to research zoonotic (animal- to- human) diseases such as the West Nile Virus, avian influenza and anthrax.

So the The National Bio and Agro-Defense Facility that is being proposed for the corner of South Milledge and Whitehall in Athens - on pastureland bordering the Oconee River - right across the street from Peppino's Pizza, is actually a relocation of the Plum Island Animal Disease Research Center . But wait, why were they studying all this nasty stuff on an island to begin with?

Well, once upon a time, there was a law that prohibited studying foot-and-mouth disease on the United States mainland in order to prevent an outbreak. (The law reads that " no live virus of foot-and-mouth disease may be introduced for any purpose into any part of the mainland of the United States ("except coastal islands separated therefrom by water navigable for deep-water navigation and which shall not be connected with the mainland by any tunnel.") The PIADC was the only laboratory in the U.S. to do this, as it was located on an otherwise uninhabited island, with the employees ferried in and out on a daily basis.

But "In 1990, the original 1884 statute was amended, 21 U.S.C. 113a, to authorize the Secretary of Agriculture to issue a permit for FMD live virus work on the U.S. mainland when necessary and in the public interest." And I guess that permit is about to be issued for the NBAF. According to a USDA document (Title VII Research – under "Foreign Animal Disease Research"), "Today, modern biocontainment facility construction and rigorous biosafety operational standards allow such work to be safely done without fear of virus escape to the environment or harm to animal and/or public health."

Yes, foot and mouth disease could never escape such a strongly contained lab in this day and age. At least not in America . Last week the dreaded FMD hit two farms in England, resulting in the culling of more than 500 farm animals. Those silly limeys got all in a huff because the last time Foot and Mouth Disease broke out it cost the country around 16 billion dollars. The cause? According to The UK Telegraph, it was most likely "A major lapse in security at a Government research laboratory complex" located three miles from the farms.

Maybe we should tell the kids in the green field to bring in the kite."

"Mr. DeGennaro,

I imagine we will publish both columns. However, to be perfectly candid, we're looking for columnists with more than a single-issue interest. I'd much prefer seeing something from you on a subject other than NBAF.

7 cont.| 27.0

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Jim Thompson"

"Mr. Thompson,

Thanks for writing me back.

I have many other interests besides the NBAF, but the reason I choose to write about it is because it seems to be the story that no one is really talking about. There are many issues about the proposed facility that have not been addressed:

Jobs - We hear 250-300 jobs. We used to hear 500. When you contact the people at UGA they tell you that no exact number or types have been provided by the DHS. When you ask for a copy of the CVIOG study we always see in press releases ("20-year impact at \$1.5 billion to \$2.5 billion in wages/salaries, and an estimated \$3.5 billion to \$6 billion in overall economic impact") they tell you no formal study has been done, so no copy exists. When you press them on what numbers they used to come up with their figures, they can only tell you what the DHS told them - which is 250-300 jobs and that's it. But when you read the a DHS FAQ where someone asked if the Plum Island people would be transferred over, they answer that the Plum Island programs will be transferred, but never answer the question.

"Big Bio" - A billion dollar industry that once was concerned with the promotion of genetic foods changed direction after 9/11 and now are in the business of subcontracting out the running of bio labs like the NBACC in Maryland. The University will not be running NBAF, so who are these people?

Transparency - how much will the community will told over just what the NBAF will study, and how much will not be withheld due to concerns over National Security? This thing is being proposed with no specifics - how will these diseases be transported, what the design is of the building that we are told is safe, who is responsible for safety security. How can the community make an informed decision if we don't have these facts?

Does this create more of a problem rather than solve it? - A few years ago, 700 scientists signed a letter where they said the DHS is creating more of a threat by introducing all these Biolabs. They also said a lot of money is being spent the research of potential minor threats rather than the stuff that is already here. Plus, does having more bioresearch in Athens make it a terrorist target?

The difference between "offensive" and "defensive" research - The former director of Plum Island said that there really is no difference. How close is the United States coming to violating the Biological Weapons Conventions, if it hasn't already?

Upcoming Meetings - The DHS scoping one is scheduled for September 20th, the UGA one that was supposed to be in mid August has not been announced yet.

7 cont. | 27.0

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Sure, I have other interests. I'd like to write about the Good Ol' Boy cover up at Moore's Ford Bridge. I'd like to do a piece over why people seem to cheer Mike Gravel and Dennis Kucinich so loudly at the debates, but why that enthusiasm never transfers to the voting booth. (Hell, I agree with everything they say but would be hard pressed to actually vote for them.) I'd like to do a column on "townie bars" versus "college bars" in Athens. I'd like to get to the bottom of why Oconee County will never have a bar. I'd like to ask Paul Broun just what he talks about with Jesus every day.

It's just that I think that right now - and until October 2008 when the NBAF site is announced - that a DHS biolab is far more important than those other things.

Thanks,  
Matt"

(Although my two sample columns generated a tremendous amount of comments pro and con online, and was a top vote getter among readers, I was not hired as a columnist for the Banner-Herald, and received no explanation why not.)

7 cont.|27.0

On 9/05/07 the first letter to the editor regarding NBAF was published in The Athens Banner-Herald:

"Chuck Murphy: Serious questions remain on planned biodefense lab  
| | Story updated at 7:25 PM on Wednesday, September 5, 2007

The headline on Friday's front-page story on the National Bio- and Agro-Defense Facility, "Biodefense lab pitched as no threat," is correct: The Thursday presentation at the University of Georgia's Center for Continuing Education portrayed the facility as being safe, with nothing to worry about from the standpoint of biohazards.

However, the presentation was a "pitch." It clearly was a presentation in favor of the facility, with no mention of any possible negative effects. And there's always another side to the story. Regarding the question mentioned in the first paragraph of the story, "What's the worst that could happen?" I don't feel we ever really got a clear answer Thursday. As a resident of metro Athens, I think there are still questions that need to be answered before we can feel safe about this facility being constructed in Athens-Clarke County, if this is the location eventually chosen for the facility.

The NBAF will replace an aging facility on Plum Island, New York. Not mentioned at Thursday's meeting was the fact the Department of Homeland Security, which will operate NBAF, recently decided to consider locating the new facility on Plum Island. This potential location is in addition to Athens and the four other sites on the short list. However, as one indication of local sentiment about this proposal, both of New York's senators and the local congressman have opposed it. Sen. Hillary Clinton said it's too close to New York City. If the 85 miles from Plum Island to Manhattan are too close, shouldn't we be taking a closer look at whether we want this facility five miles from the center of Athens-Clarke County?

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Chuck Murphy”

On 9/12/07 I had the following exchange with Athens Clarke County Commisioner Doug Lowry, (after writing the entire commissioner and mayor)

“To all Athens and Oconee County elected officials:

Last month's Foot and Mouth disease outbreak in the UK has not been contained. There was a new case reported this morning:

<http://www.telegraph.co.uk/news/main.jhtml?xml=/news/2007/09/12/nfoot312.xml>

7 cont.| 27.0 Please consider all the facts when weighing your support for NBAF.

Thanks,  
Matt DeGennaro”

“Mr. DeGennaro:  
What specific points do you see as relevant between the proposed NBAF and last month's Foot and Mouth disease outbreak in the UK?  
What exactly are the facts that you believe we are not considering in our determinations?

Thank you,

Doug Lowry”

Mr. Lowry,

Thanks for writing me back.

My specific concerns regarding FMD being studied at NBAF are as follows:

1. The public is not being informed of just how contagious FMD is at public meetings, nor are they told of the implications of an outbreak. Dr.Brown, who spoke at the last meeting, had no trouble illustrating the disease for the Atlanta Journal Constitution. ( "...she has her students imagine that she is a pig with foot-and-mouth, and that they are cloven-hoofed animals. In the five minutes it takes her to describe the virus, they will have the disease."It is the most contagious virus known to man," Brown says. "Period.") But, at the meeting, this vital information was not presented. How can the public make an informed decision when answers are not forthcoming ? (This is just FMD - it looks like the DHS will never provide UGA with an actual specific list of what else will be studied there)

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2. At the meeting, when the UK outbreak was discussed, we were basically told "Don't worry - that facility was old". Yet I read this in an English paper, which talks about the official report - "Floodwater from persistent rain in July is suspected of having surged up through sewers at the laboratories and then been carried off of the site by the builders' vehicles."

[http://www.surreyad.co.uk/news/2014/2014749/foot\\_mouth\\_blamed\\_on\\_lack\\_of\\_lab\\_checks](http://www.surreyad.co.uk/news/2014/2014749/foot_mouth_blamed_on_lack_of_lab_checks)

The public has not been presented with any specifics as to building plans, what will be studied there, and why it's being studied. I just don't see how anyone can support NBAF on the vague promises of the DHS.

Thanks,  
Matt DeGennaro"

On 9/13/07 Commissioner Lowry responded:

"Mr. DeGennaro:  
It took me some time to put this together, but I believe it answers your questions. Let me know if I can help you with another issue.

7 cont.| 27.0 I welcome you to attend the NBAF session at 6pm on Sept. 20 at the Georgia Center. Here you will be able to direct questions to the DHS representative and other officials who are knowledgeable about these diseases. UGA infectious disease experts, including Dr. Brown, will also be on hand and available to those in attendance to discuss these issues in more detail and with a level of expertise that I am not qualified to provide.

Doug Lowry  
A-CC Commissioner, District 1

1.) At the meeting for environmental groups, in response to the question, "What's the worst case scenario?", Dr. Brown said FMD would be the worst case -- for animals. A pathogen that is extremely contagious is not necessarily a threat to humans. FMD is extremely contagious -- the most contagious virus known -- to cloven-hoofed animals. FMD does not represent a threat to humans. While humans might unwittingly carry the virus on their clothing or perhaps in their nasal passages for a short period of time and so infect another herd. There is no infection of humans due to this eventuality. The virus does not get into the human system to cause disease. It is important to note that agricultural associations throughout Georgia support the NBAF because they understand that it will help to protect agriculture in the state.

Dr. Brown also said that NBAF will study other diseases that may infect humans; this conclusion is based on the list of diseases that DHS has said would potentially be studied. Dr. Lee showed this list in his presentation. In addition, information about the diseases that may be studied at the NBAF has been made available in other ways. In the materials for the scoping meetings (on its web site), DHS lists the diseases that may be studied at the NBAF and briefly describes the animals they infect, and whether or not humans are infected. The [www.uga.edu/nbaf](http://www.uga.edu/nbaf) web site also lists the diseases and includes links to information about the diseases from authoritative sources.

DHS has provided a list of possible diseases for study; Dr. Lee explained in his presentation that the NBAF must be flexible if it is to respond to the latest threats. Just as the CDC, the human equivalent of NBAF, must be ready to respond to an outbreak of a new or re-emerging threat of human disease -- whether it is anthrax or SARS or mad cow disease or tuberculosis or the next new disease -- NBAF must also be able to respond to emerging foreign animal disease threats as they arise. The facility will not be operational until 2013; new or different diseases may present greater threats by then.



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2.) This is correct, the reports indicate that heavy rains did contribute to the FMD outbreak in UK. It is also true that the Pirbright facility is old. Aging infrastructure (including drainage) was a major factor contributing to the outbreak. A direct comparison to what happened at Pirbright and what COULD happen at NBAF is difficult to make. Here's why: Three laboratories share the Pirbright facility: a government research laboratory, a small biotech company that works on stabilizing vaccines, and a large vaccine manufacturing facility. The research lab, which is what NBAF would be, has been cleared of contributing to the outbreak in the FMD investigation. The final reports conclude that the release was most likely due to escape of live virus from the drainage system that connects the vaccine production plant to the sodium hydroxide treatment tanks on another part of the Pirbright site. From there, it is believed that trucks carried the virus outside of the facility. The differences in the operations, including disinfection procedures, equipment and, as Dr. Lee pointed out in his presentation, the quantities of FMD virus used, are very different in the types of facilities. For example, the research facility and biotech company handle orders of magnitude -- greater than one million -- less live virus than the vaccine production plant. The fact that huge quantities of live virus were being grown in the commercial facility amplified any weaknesses in the old and apparently poorly maintained drainage system used at Pirbright. There is no reason for this to happen at NBAF.

7 cont. | 27.0

To address your last questions:

Building plans: There are none, yet. Dr. Lee explained at the meeting that DHS has hired a design firm for a conceptual design, but the architectural design is not possible until the site is selected; what will work at the site in Mississippi might not work in Athens. A question for DHS might be whether they can share at this point what some of the elements of the conceptual design might be.

What will be studied there: I think this is answered above.

Why it's being studied: These diseases represent threats to U.S. agriculture and public health, whether they occur naturally or are deliberately introduced. If introduced to this country, they have the potential to severely disrupt our food supply, cause long-term economic damage in the billions of dollars, and as well as threaten the public's health."

On 9/24/07 I had a letter printed in The Athens Banner-Herald

Matt DeGennaro: Local media dismissive of opposition to NBAF

At the Department of Homeland Security hearing in Athens last week on the proposed National Bio- and Agro-Defense facility, local resident Pat Priest equated the proliferation of labs housing the world's most infectious agents with the nuclear arms race. The more labs, the more vulnerable to terrorists or human error we might become.

Was she one of those "idiots" the mayor of Flora, Miss., which is also in the running as a potential site, couldn't NBAF-educate? The "pitchfork- and torch-carrying" type ("always against everything") described by WGAU-AM's Tim Bryant? A "fear-monger" from Banner-Herald Executive Editor Jason Winders' blog or a clown in Banner-Herald reporter Blake Aued's blog reference to an anticipated NBAF hearing "circus?" Perhaps just Banner-Herald Editorial Page Editor Jim Thompson's gauzy dreamer, offering "words without an echo?"

During the local NBAF hearing, hundreds of protesters were meeting in Boston to support a lawsuit to halt construction of a Biosafety Level 4 lab at Boston University. On Oct. 4, the U.S.

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House of Representatives Committee on Energy and Commerce will hold a hearing: "Germs, Viruses, and Secrets: The Silent Proliferation of Bio-Laboratories in the United States." (Proliferation? Is there an "echo" in here?)

Subcommittee chair Rep. Bart Stupak, D-Mich., asks, "Is there a point at which there are so many labs doing this research that you actually increase the chances of a catastrophic release of a deadly disease? We want to know the answer or whether anyone in the administration has even seriously considered the question."

Idiots, clowns, and usual suspects have until Friday to submit NBAF Environmental Impact Statement input to [nbaiprogrammanager@dhs.gov](mailto:nbaiprogrammanager@dhs.gov). It could become the tipping point for selection of the NBAF site.

7 cont. | 27.0 Or, you could be one of the "educated" ones and not say anything at all.

**Matt DeGennaro**

Watkinsville

On 9/26/07 The Athens Banner-Herald printed this letter:

Grady Thrasher: Real concerns on NBAF trivialized in column

In his Sunday column, "Words won't change course of development," Banner-Herald Editorial Page Editor Jim Thompson seems to have missed the entire point of the Thursday public meeting held by the Department of Homeland Security regarding the proposed location for the National Bio- and Agro-Defense Facility.

As explained by DHS on its Web site, [www.dhs.gov](http://www.dhs.gov), the National Environmental Policy Act of 1969 requires preparation of an environmental impact statement by DHS regarding the proposed site for NBAF. The DHS site further informs us, "Congress enacted NEPA to ensure that, before any action is taken, federal agencies consider the potential environmental impacts of their proposed actions and alternatives that would avoid or minimize adverse effects upon the quality of the environment."

The meeting was held to give the public an opportunity to give their comments directly to DHS to "aid the agency in determining alternatives, issues and potential environmental impacts to be analyzed." These were the matters concerned citizens spoke to with passion at the meeting. There are real environmental issues associated with NBAF, a massive project the size of several Wal-Marts, being located near the Oconee River next to the State Botanical Garden.

Athens Area Chamber of Commerce President Doc Eldridge's quote at the meeting that seems to echo repeatedly in Thompson's head "If not this, then what?" was not even relevant to the

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purposes of the meeting, nor - as Thompson suggests - was an answer to that irrelevant question required of those in attendance to validate their expressed concerns.

Thompson is wrong in attempting to trivialize residents' involvement in governmental decision-making processes affecting our fragile environment. We are not, as he says, "an ad hoc nuisance to be laughed off and rolled over." But, then, if Thompson were a serious journalist rather than just a laughable ad hoc mouthpiece for this newspaper's point of view, he already would have known that.

**Grady Thrasher**

Kathy Prescott

7 cont. | 27.0 Published in the Athens Banner-Herald on 092607"

On 9/27/07 The Athens Banner-Herald published another letter:

"Pat Priest: NBAF opponents are taking rational stance  
| | Story updated at 7:35 PM on Wednesday, September 26, 2007

The mesmerizing pull of the repeated refrain of "jobs terrorism jobs terrorism jobs terrorism" is hard to resist when considering whether it's in our community's best interest to bring highly infectious agents for which there is no cure to our town.

Proponents keep calling for opponents to rationally seek out the facts about the National Bio- and Agro-Defense Facility rather than responding with the knee-jerk reaction they characterize us as having as "activists."

It's true; digging up all the facts has taken a little time, as they aren't readily available in our local paper or at the public hearings.

With a little research, we find that there have been scores of problems at Level 3 and 4 labs around the country.

And away from the pull of "jobs terrorism," we have more time to think about the wider dangers of proliferating infectious agents and of cinching our community in to the military-industrial (and increasingly educational) complex that diverts funds from other important social initiatives and is opaque in its operation.

I'm reminded of the wonderful ending of "A Wrinkle in Time," where the girl could only resist the pulsing forces of seemingly rational groupthink by fiercely remembering the things she loved.

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If we speak out, our concern for our families and our environment - portrayed as irrational - might protect us from the purportedly rational stance taken by the activists working to bring a Level 4 facility to Athens and claiming that it will make us safer.

Pat Priest

Published in the Athens Banner-Herald on 092707"

On October 18<sup>th</sup>, 2007 I tried to get a forum piece in The Athens Banner-Herald in response to Chamber of Commerce president Doc Eldridge's question of "If not this, then what?"

The ABH did not respond, so in late November I sent the following document to my friends in hopes of receiving a reply:

7 cont.| 27.0

**HELP**  
MATT  
GET AN ANSWER  
FROM  
THE ATHENS-BANNER HERALD

☺ (me) vs. ☹ (them)

**Me ☺** - On October 18<sup>th</sup>, in trying to publicize a lecture by Dr. Steven Stice, I sent the following to Athens Banner Herald Executive Editor Jason Winders:

Jason,

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I would like to submit the following as a forum piece. (It started as a letter to the editor, but then got out of hand)

Thanks,  
Matt

"If not this, then what?"

Doc Eldridge, Athens Area Chamber of Commerce president, threw down the gauntlet at the September 20 th Department of Homeland Security NBAF meeting. An Associated Press story described his words as "an almost frustrated plea" to the proposed facility's detractors. Athens Banner- Herald's Jim Thompson chimed in a few days later, calling for alternate ideas from otherwise "ad hoc nuisances to be laughed at and rolled over."

7 cont.| 27.0 All right, then. Eldridge's question may have been answered on a Sunday afternoon in a Watkinsville library a few weeks back.

Dr. Steven Stice, one of the world's leading researchers in cell therapeutics gave a lecture to about twenty people that afternoon. He explained that embryonic stem cell research has the potential to cure or ameliorate hundreds of serious diseases – everything from Parkinson's and Alzheimer's to spinal cord injury and heart disease. It was like hearing about the potential of some faraway scientific miracle, except the work is already being done right in our own backyard in a UGA lab.

Stice is especially valuable because he combines an entrepreneurial focus with leading-edge scientific research. His lab is one of only a handful that teaches people how to grow embryonic stem cells, and his fledgling business will provide other scientists with a product to be put to work in exciting research projects around the world. But this preeminence is endangered because of restrictions on funding and limitations on stem cell sources in America, where our President has twice vetoed needed stem cell legislation. Meanwhile, the British government funnels funds to researchers and has set up a stem cell "bank" providing scientists with easy access to stem-cells, and Cambridge University is home to a multi- million dollar research center. In 2001, Singapore opened a 287 million dollar government biotech lab called "Biopolis" which focuses chiefly on stem cell research.

We have a world-class researcher in our midst who desperately needs funding and support. But the Georgia state legislature will see in 2008 a continuing attack on so-called "pro-life" issues. Reading about this, I learned of a new term - "personhood". At first I thought it may have been a new phrase coined by Stephen Colbert, but is actually a word invented by proponents of something called the "paramount human life amendment". A resolution proposed last Spring in the Georgia legislature aims at amending the state constitution to establish the "personhood" of each of its citizens "including unborn children at every state of their development, including fertilization." This type of amendment could possibly impact everything from embryonic stem cell research to living wills.

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With this kind of "support," how long will it be before Dr. Stice decides to pack up and take his research and business elsewhere?

Instead of using old tired labels like "pro-choice" and "pro-life" to define each other, perhaps some new ones are in order. Maybe we should start characterizing those who blindly oppose embryonic stem-cell research as "pro-heart disease", "pro- Parkinson's" and "pro-Alzheimer's." We need to intelligently address the ethics and morality of embryonic stem-cell use if we are going to play a leading role in helping mankind with eradicating diseases. Stice explained that stem cells that could be used for research are removed from human embryos that are unsuitable for fertility treatments because of improper development, and earmarked for disposal. He pointed to a recent poll in which 67% of participating Georgians support research with embryonic cells that would otherwise be discarded. The more people learn about the process, the clearer its moral basis becomes. Even National Institutes of Health (NIH) director Elias Zerhouni,--breaking with President Bush-- says, "All avenues of research need to be pursued."

If we attract yet more biolabs like NBAF to Athens, might we soon be known as "The germ capital of world – the most dangerous place on earth"? There is already the genesis of a cutting-edge biotech industry here. Why not focus on being the capital of stem cell research? Let's support bringing life-affirming companies like Stice's to Athens. We would not have to ask some Homeland Security guy about the " worst-case release scenario" if a discarded embryo were to escape, and perhaps we would all feel a sense of pride in the knowledge that our town is doing something to help mankind. We can put fear on the back burner. America can be number one in world respect again, and Athens can lead the way.

And that would do wonders for all our "personhoods."

Anyone in interested in hearing Dr. Steven Stice speak can do so this Monday, October 22, at 5:30 in the Animal and Dairy Science Complex auditorium (Room 101) River Rd., on the UGA campus, near the Ramsey Center.

**Them ☹** - *Later that day Jason responded (The mention of "comix" is in reference to some comic books I sent him the previous week.):*

Thanks, Matt. I'll pass along to JT. Got the comix Thursday. Will dive in this weekend. As for the podcast, consider any comix-related commentary (no need to peg onto your comic). Just a thought.

Cheers,

J.  
Jason winders  
Executive editor

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☺ **Me** – *Not having heard anything back, I sent the following to Editorial Page editor Jim Thompson on October 21 at 8:35 A.M.:*

Jim,

Just a quick note to make sure you received the following Forum submission (Jason said he would forward it to you last Thursday). Dr. Stice will be speaking tomorrow night.

Thanks,  
Matt

*October 22<sup>nd</sup> the paper comes out. No me in it. Worst yet – less publicity for that night's lecture. Hating to see it go to waste, (and equally hating being called "an ad-hoc nuisance to be laughed at and rolled over") I send the forum piece to all local elected officials I could think of and my anti-NBAF friends.*

*I send the following to Jim Thompson:*

Jim,

I was wondering if you might share with me the reasons why you decided not to publish my forum piece.

Thanks,  
Matt

*I receive no response. The next Sunday I notice Jim Thompson is starting a "What's your beef" type column (called "What the Problem Is") and encourages readers to send in their suggestions. On October 28<sup>th</sup> I send him the following:*

What the Problem Is...

Jim,

The Editorial Page Editor of my local paper wrote a column last month where he said:

*"..what came from opponents of NBAF Thursday was their absolute shock - shock, they said - that something like NBAF was considered a proper fit for this community. What didn't come from them was an answer to Eldridge's question. And that's what they need to come up with, if they want to be considered a force to be reckoned with rather than an ad hoc nuisance to be laughed off and rolled over."*

*I thought this was an interesting point. I wrote a response and submitted it as a forum piece. It was not published, and when I e-mail him to ask why, he does not respond. Can you help? (I can give you the gentleman's contact information if necessary.)*

Thanks,

7 cont. | 27.0

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Matt

 **Them** – On October 31<sup>st</sup>, Jim writes me back:

Matt,  
Sorry to be so late in getting back to you. I've been trying since I received your e-mail to find a few minutes to respond.

There are a couple of reasons I've opted not to use your Forum submission.

The first is related to your suggestion of Steve Stice's research as an alternative to NBAF. I'm just uncomfortable with putting Stice in the forefront of this argument without knowing his position on NBAF, which, for all I know, he might support. Did you talk with him to discern his position on NBAF? Also, how do we know, as you contend, that Stice "desperately needs funding and support." Hasn't he received assistance from the University of Georgia in incubating a couple of businesses related to his research?


7 cont.| 27.0

The second reason is related to a single sentence in your submission, which reads, "Instead of using old tired labels like "pro-choice" and pro-life" to define each other, perhaps some new ones are in order." As a matter of policy, the Banner-Herald doesn't publish letters, forums or editorials that mention the abortion issue. Obviously, abortion isn't the focus of your Forum, but your reference to the subject would certainly prompt responses that would focus on that issue. As a point of information, the reason we don't publish opinion pieces on abortion is our view that it's an issue on which most people have made up their minds, and nothing is going to persuade people to take a different position.

All that said, I'd be more than willing to publish a Forum piece from you that makes the point that alternative biotech pursuits, like embryonic stem cell research, represent a sensible alternative to NBAF. As I've noted, I'd just be more comfortable with a piece that didn't specifically push Stice to the forefront, and that avoided language like "pro-choice" and "pro-life."

I hope this is responsive to your concerns. If you have additional questions or comments, please feel free to e-mail me, or give me a call at (706) 208-2222.

Jim

 **Me** – To which I reply to on November 3<sup>rd</sup> at 8:05 A.M.:

Jim,



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Thanks for explaining why you didn't run my Forum piece before Dr. Stice's speech at UGA. Luckily, it is still relevant. To respond to the points you raise:

I've been trying to remain blissfully ignorant regarding Dr. Stice's support for NBAF. The previously submitted forum piece makes no mention as to whether he is for or against the facility – and in writing it I took great caution in presenting it as MY opinion (as befits a Forum piece) and not the opinion of Dr. Stice. As you know, it was written in response to the question of "If not this, then what"? – A question addressed to opponents of NBAF and not to Dr. Stice.

I would guess that as an employee of UGA, Dr. Stice is "for" NBAF. But I would not ask him his opinion on NBAF. It would be besides the point (why should I ask him if my own opinion is valid?) And there is such strong support for the lab by the University's administration that I would never want to put him in any sticky political mess. Once again, the forum piece is MY opinion about the direction in which Athens should be headed with regard to NBAF, not Dr. Stice's endorsement or opposition to the lab. It would have never been written unless Doc Eldridge's question was amplified by your own column. I thought I would try to provide one answer.

Responding to your concern about Dr. Stice, I added the following paragraph to clarify:

"I have no idea of what Dr. Stice thinks of the proposal to bring NBAF to Athens; this Forum is just one person's thoughts as I weigh the relative merits of supporting two very different types of commerce in our town. Obviously, one won't cancel out the other in the equation, "If not this, what?"

My contention that Dr. Stice "desperately needs funding and support" is supported by attending two lectures in which he talked at length about the lack of federal funding for embryonic stem cell research. Yes, he has received some UGA support, but nowhere near all the hoopla and hundreds of millions of dollars that surround NBAF.

But, responding to your criticism, I did change the line to read "We have a world-class scientist in our midst who needs funding and support."

Regarding the use of the sentence "Instead of using old tired labels like "pro-choice" and pro-life" to define each other, perhaps some new ones are in order." - I am attempting to reframe the discussion over stem-cell research. When people think of stem cells, they automatically have a knee-jerk reaction to that and think "abortion" "cloning" or life being somehow sinisterly created to be destroyed for scientific purposes. I was trying to pre-empt this by commenting on the labels we always use to define each other and to call attention to the fact that what Stice talked about in both lectures was using discarded embryos for research. I didn't know this fact, and am trying to share it with others.

But when you say "As a matter of policy, the Banner-Herald doesn't publish letters, forums or editorials that mention the abortion issue," I'm confused. Using the Banner-Herald's website's search engine, I found many letters, forums and editorials that do mention the abortion issue over the past few years (see below.)

7 cont.| 27.0

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If this is the paper's policy, where exactly is it printed to warn any potential writer that a piece will not be considered due to the subject of abortion? I failed to see it. Are there any other issues that will not be given consideration for publication in the Banner-Herald?

Why should the abortion discussion have ended anyway? I personally believe that so many people are against stem-cell research precisely because they tie it up with the abortion issue and are not informed of what it actually entails. Once again, I did not mention the word "abortion", I just mentioned the labels people use to define each other. I'm commenting on the debate itself and the language we use when enter such a discussion.

When you say my "reference to the subject would certainly prompt responses that would focus on that issue," what would be wrong with that? I thought that was what a Forum was supposed to be about – an exchange of ideas. I say one thing, and then someone can write in and say "What Matt fails to realize is..." and give their view.

To meet your reputed policy, the phrases "pro-choice" and pro-life" have been removed.

I hope you will take the time to read the attached resubmitted forum piece. Please let me know if you intend to publish it or if any other changes are needed.

Thanks,  
Matt

Links to letter, editorials and columns that mention abortion:

2000 - [http://www.onlineathens.com/stories/100700/opi\\_1007000041.shtml](http://www.onlineathens.com/stories/100700/opi_1007000041.shtml)

2001 - [http://www.onlineathens.com/stories/112601/let\\_letter5.shtml](http://www.onlineathens.com/stories/112601/let_letter5.shtml)

2001 - [http://www.onlineathens.com/stories/110901/let\\_letter3.shtml](http://www.onlineathens.com/stories/110901/let_letter3.shtml)

2002 - [http://www.onlineathens.com/stories/021002/opi\\_0210020015.shtml](http://www.onlineathens.com/stories/021002/opi_0210020015.shtml)

2003 - [http://www.onlineathens.com/stories/012403/let\\_letter5.shtml](http://www.onlineathens.com/stories/012403/let_letter5.shtml)

2003 - [http://www.onlineathens.com/stories/021203/let\\_20030212030.shtml](http://www.onlineathens.com/stories/021203/let_20030212030.shtml)

2003 - [http://www.onlineathens.com/stories/022203/let\\_20030222100.shtml](http://www.onlineathens.com/stories/022203/let_20030222100.shtml)

2003 - [http://www.onlineathens.com/stories/112503/let\\_20031125003.shtml](http://www.onlineathens.com/stories/112503/let_20031125003.shtml)

2006 - [http://www.onlineathens.com/stories/110806/opinion\\_20061108054.shtml](http://www.onlineathens.com/stories/110806/opinion_20061108054.shtml)

2006 - [http://www.onlineathens.com/stories/112606/opinion\\_20061126059.shtml](http://www.onlineathens.com/stories/112606/opinion_20061126059.shtml)

2007 - [http://www.onlineathens.com/stories/032507/news\\_tant.shtml](http://www.onlineathens.com/stories/032507/news_tant.shtml)

2007 - [http://www.onlineathens.com/stories/080207/opinion\\_20070802013.shtml](http://www.onlineathens.com/stories/080207/opinion_20070802013.shtml)

2007 - [http://www.onlineathens.com/stories/080707/living\\_20070807002.shtml](http://www.onlineathens.com/stories/080707/living_20070807002.shtml)

2007 - [http://www.onlineathens.com/stories/051207/opinion\\_20070512026.shtml](http://www.onlineathens.com/stories/051207/opinion_20070512026.shtml)

2007 - [http://www.onlineathens.com/stories/042207/opinion\\_20070422002.shtml](http://www.onlineathens.com/stories/042207/opinion_20070422002.shtml)

2007 - [http://www.onlineathens.com/stories/071207/opinion\\_20070712018.shtml](http://www.onlineathens.com/stories/071207/opinion_20070712018.shtml)

7 cont.| 27.0

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2007 - [http://www.onlineathens.com/stories/032207/letters\\_20070322022.shtml](http://www.onlineathens.com/stories/032207/letters_20070322022.shtml)  
 (If you use the onlineathens.com search, you will also find several letters that use the terms "pro-life" and "pro-choice")

## Them -

*The next day in Sunday's paper we read Don Nelson's column in the business section:*

### **Stem cells also might help area**

**Biotechnology**  
 By Don Nelson

Recent biotechnology debates in our town have centered on the proposal to locate the National Bio and Agro-Defense Facility - a huge animal disease research lab - in Athens. Some people question the need to bring the facility here.

Whether or not we need NBAF offers a good, and healthy, debate. On one hand, Athens has survived without the facility so far, so likely could continue without it. On the other hand, NBAF promises a bounty of high-paying jobs and the potential for creating many small businesses. In addition, NBAF could provide the key to paving Georgia Highway 316 with biotech industry between Athens and Atlanta.

Then, of course, there is the burning question about whether or not NBAF would put Athens residents in danger from the strains of animal diseases that will be studied there. Despite the assurances of officials that the high-level security facility would provide more than ample safeguards, even the slightest risk of releasing a dangerous pathogen convinces some to oppose the facility.

Regardless of the NBAF question, however, there is a private research firm much closer to home that needs the attention of Athens and Georgia officials.

University of Georgia stem cell researcher Steven Stice started up his Aruna Biomedical company in 2003 through a licensing agreement with UGA Research Foundation, allowing the university to benefit from Aruna's sales.

Stice's company has developed a way to quickly grow billions of embryonic stem cells into nerve, brain and spine cells using neural progenitor cells from lines registered with the National Institutes of Health.

The small company Stice runs sells a kit containing a vial of cells and a lab manual on how to grow the cells to other research facilities. The potential for revenues exceeds hundreds of millions of dollars.

Aruna's process shortens the time and expense other researchers need to grow their own stem cells to work on cures for diseases such as Alzheimer's, Parkinson's and spinal cord injuries. It also could speed up the discovery of those cures.

7 cont.| 27.0

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The company also has found a way to use the neural cells to serve as a portable chemical weapons detection system to be used in the field and detect the presence of chemical agents, similar to the way canaries were used in mines to detect toxic gas.

Stice recently gave a PowerPoint presentation that covered Aruna and stem cells. About 50 people, including several business and elected officials from Athens-Clarke and Oconee counties attended.

It was an impressive and enlightening talk that also covered the political and ethical dynamics of stem-cell research. Stice pointed out that despite a study that 67 percent of people polled approved of research use of embryonic stem cells from fertility clinics, some state politicians still want to ban them. We're talking about nonviable stem cells normally discarded by the fertility clinics.

Aruna now employs eight people, and Stice needs to hire a senior manager to run the company and help with the marketing and production of the cell products. Continued growth means hiring more people for good pay.

"It's strange to be involved in a company that's selling a product," the researcher said.

What would be strange is if we let this company get away from us. Already there are economic enticements from Wisconsin to lure Stice away.

Existing companies like Stice's need the economic and political capital of our state and local officials to help them grow and in turn help our communities grow with safe and promising research.

Let's hope moralistic politicians don't run Stice off and ruin a potential golden goose.

Published in the Athens Banner-Herald on 11/04/07

*Now, I am not saying they ripped off my idea. My idea wasn't even that original. Lisa Majersky had this letter published in the ABH way back on September 26th, 2007:*

Maybe Editorial Page Editor Jim Thompson, who paraphrased some of my comments at last week's hearing on the National Bio- and Agro-Defense Facility in his Sunday column, didn't hang around to hear my later comments, where I answered to the question, "If not this, then what?"

I suggested that instead of NBAF, perhaps eventually a larger-scale stem-cell research industry could be developed locally, instead of working with dangerous pathogens.

Friday's Atlanta Journal-Constitution included an article about pioneering University of Georgia stem-cell researcher Steve Stice, who is working with the U.S. Naval Research Laboratory to develop a portable chemical detection device for protection of troops on the battlefield, using neural progenitor cells derived from the few lines of embryonic stem cells permitted for research by the government.

It's a shame that with so many of our young soldiers coming back from the war with nerve damage, paralysis, brain damage and burns, and so many people suffering from Alzheimer's and

7 cont. | 27.0

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other degenerative diseases, that so much time and human brainpower is not being used to concentrate on looking for cures, now that the possibilities of stem cells are widely suspected.

There are many other branches of biotechnology that could come to Athens. The big drug companies that have opted against locating on the local "Orkin tract" must have their own reasons for not wanting to do so. I suspect it's our water supply, more than anything, at this point.

How about a synthetic water factory? Good luck with that one!

...so they do publish stuff about NBAF and Stice.

☺ **Me** – So I took one more shot at this a few days ago (November 12<sup>th</sup>):

Jim,

Just a quick note to ask if you ever intend to publish my forum piece. I noticed last Sunday the business columnist wrote about stem cells, NBAF, and Dr. Stice - which seems strange to me because one of the reasons you rejected my original piece was :

"I'm just uncomfortable with putting Stice in the forefront of this argument without knowing his position on NBAF"

Remember that I added to my revised piece that I did not know if Dr. Stice supported NBAF, and removed the words "pro-choice" and "pro-life" to fit your stated criteria for having a forum published. This was well in advance of last Sunday's business column.

When you said:

"All that said, I'd be more than willing to publish a Forum piece from you that makes the point that alternative biotech pursuits, like embryonic stem cell research, represent a sensible alternative to NBAF. As I've noted, I'd just be more comfortable with a piece that didn't specifically push Stice to the forefront, and that avoided language like "pro-choice" and "pro-life.""

I took you at your word.

Matt

*("I took you at your word" – how cryptically grim of me.)*

So,

7 cont.| 27.0

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*If you would be so kind as to e-mail Mr. Thompson to ask him just why he will not publish my forum piece, that would be quite cool of you. I'm out of gas. You can even tell him that I asked you to do so – there's no reason to be sneaky. I would just really like to know why.*

7 cont.| 27.0

## Contact:



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me - [mattdegennaro@gmail.com](mailto:mattdegennaro@gmail.com)

On 9/27/07, I submitted the following 43 questions as scoping comments to The NBAF Program Manager through email and the Postal Service. I am resubmitting them in the hopes of getting direct and concise replies to each question in the FEIS:

1. In the DEIS and FEIS, the assessment of likely impacts upon the environment must be as free from bias as possible. Describe the formal mechanism for assessing the adequacy and objectivity of information and analysis provided in the document.

8| 4.0

2. Explain the methodology of prediction and evaluation of cumulative, short and long term environmental impacts, and in the discussion of each, whether /how each impact will be avoided or ameliorated. Identify any experts used in the EIS process to analyze the environmental impacts and documentation submitted by DHS.

3. Alternatives, mitigation and monitoring plans for each type of impact should be included. Explain how the five (or six) site finalists will be compared, and how much weight various factors will receive in choosing the final site, including what factors would contribute to a No Action option for any or all of the sites.

4 cont.| 4.2

4. The Athens community should have the ability and opportunity to submit exhibits from its own experts in the fields of wildlife, engineering and hydrology, architecture, biolab safety, etc. However, in order for the general public and experts to evaluate the information provided by the DHS in the DEIS, UGA should make available to the public and its experts a number of opportunities for guided or unguided tours of the site. These "open house" dates should be scheduled as soon as possible (in time for comments in the FEIS) in order for the public and experts to be able to access the same "level playing field" as the DHS, whose representatives have previously been presented with a visit to the site. No such opportunity has existed for the public, and yet the Athens community is being asked to weigh information and formulate

Comment No: 8

Issue Code: 4.0

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 list of preparers and experts used in the EIS process to analyze the environmental impacts are included in Chapter 6.0 of the EIS. The primary objective of the EIS is to evaluate the environmental impacts of a range of reasonable alternatives for locating, constructing and operating the NBAF and the No Action Alternative. 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. For each resource area analyzed, a description of the methodology used for evaluating affected environment information and for assessing potential environmental impacts on the resource is included at the front of the respective resource subsection in the NBAF EIS and/or in supporting appendices. Potential mitigation measures for avoiding or minimizing potential environmental impacts are discussed throughout the resource subsections of the NBAF EIS, with a more detailed discussion of mitigation measures included in Section 3.15. Several factors will affect the decision on whether or not the NBAF is built, and, if so, where. The EIS itself will not be the sole deciding factor. The decision will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable Federal, state, and local laws and regulatory requirements; 4) consultation requirements among the Federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment. 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.

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- 4 cont. | 4.2 relevant questions for examination in the environmental impact document. DEIS and FEIS comment period deadlines should be extended until there has been an adequate opportunity for these site visits and development of expert opinion to be transmitted to DHS.
- 6 cont. | 26.0 5. Please publish all expenditures by the federal government in regards to DHS site selection process, scoping process and Environmental Impact Statement process for Athens, GA. for the period from the original "Notice of Request for Expression of Interest for Potential Sites for the NBAF" published January 19, 2006 until the end of the public comments on the scoping document, September 28, 2007.
- Since the DHS site selection process, scoping process and Environmental Impact Statement process were paid for by taxpayers, are there any federal monies available to the community in order to hire independent experts in the fields of wildlife, engineering and hydrology, architecture, biolab safety, etc? Please provide any information that would guide the community in obtaining federal funds to hire its own experts.
- 9 | 23.0 6. Based on recent build-out activity of bio-labs in the past several years, present a REALISTIC detailed calendar of construction plans for the community's consideration.
7. In order to fully establish the environmental impact that NBAF will have on the surrounding community, please provide a complete list of every virus, disease and pathogen or any agent that will be studied or considered for study at the NBAF. Please describe each virus, disease, pathogen or infectious agent and the reason for study.
8. Please define what a "select agent" is and if such agents be studied at NBAF.
- 10 | 19.0 9. What is the worst case release scenario if a virus, disease, pathogen or infectious agent escapes from NBAF? What is the worst case release scenario for humans? What is the worst case scenario for animals?
10. In regards to a worst case release scenario, please describe in detail the differences of disease transmission in relation to NBAF. What viruses, diseases, pathogens or infectious agents can be spread through direct or indirect contact? Please include all possible methods of transmission (direct, indirect, droplet contact, airborne transmission, fecal-oral transmission, vector-borne transmission) in relation to each virus, disease, pathogen or infectious agent.
- 11 | 2.0 11. Will the scientific work performed at NBAF be published or will it be classified? Since the facility falls under the purview of DHS, will research be kept from the public in the interest of national security? How transparent will NBAF be?
- 12 | 8.2 12. Please specifically define the relationship that NBAF will have the University of Georgia. Will students be guaranteed educational opportunities at the lab? Will University students and professors have access to the lab to utilize NBAF for research purposes? How open will NBAF's door be to UGA in terms of a partnership?

Comment No: 9 Issue Code: 23.0

DHS notes the commentor's concern that a detailed construction schedule is 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 protocols, including detailed construction plans, would be developed 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.

DHS notes the commentor's concern that all possible pathogens to be studied at the NBAF are not listed in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Chapter 2, Section 2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluate of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required."

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.

DHS notes commentor's concern that the NBAF will be staffed with the appropriate personnel to safely and efficiently operate the NBAF. DHS and USDA have minimum standard qualifications for technical personnel and require stringent training in laboratory safety. In addition to the scientific and administrative staff of the laboratory, the proposed NBAF facility would employ technicians, veterinary staff, building engineers and security. All laboratory staff would have thorough training in handling hazardous infectious agents, understanding primary and secondary biocontainment functions of standard and special practices, and an understanding of biocontainment equipment and laboratory characteristics. Laboratory staff would be supervised by trained and experienced scientists. The NBAF safety and biosafety staff would review and approve of proposed protocols and SOPs for the laboratory prior to use. Laboratory staff working in the proposed NBAF would use the standards and procedures recommended for all institutions engaged in biological research.

DHS notes the commentor's concern. Section 3.13 of the NBAF EIS describes the processes that

would be used to control and dispose of liquid and solid waste from the NBAF, with Sections 3.3 and 3.7 of the NBAF EIS describing the standard methods used to prevent and mitigate potential effects of spills and runoff. Since the method of carcass disposal has not yet been determined, the effects of alkaline hydrolysis, incineration, and rendering were included in the analysis presented in Section 3.13 of the NBAF EIS. Incineration has the potential to affect air quality, so the evaluation in Section 3.4 (Air Quality) of the NBAF EIS assumed only incineration would be used to assess the greatest adverse effect. Alkaline hydrolysis would have the greatest effect on sanitary sewage capacity, Section 3.3, so the sanitary sewage effects were determined using this method.

A discussion of select agents is included in Appendix E.

DHS notes the commentor's opposition to the five mainland site alternatives. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF. No-fly zones would be considered along with other security measures for the proposed NBAF regardless of the site selected.

DHS acknowledges and agrees with the commentor's statement that no mention of a Sensitive Compartmented Information Facility (SCIF) conference room is in the NBAF EIS.

Comment No: 10                      Issue Code: 19.0

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. 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. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in 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, 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: 11                      Issue Code: 2.0

DHS notes the commentor's questions regarding the public availability and transparency of NBAF research. There would no classified research at the NBAF, however there may occasionally be classified FBI forensics cases. Currently, the PIADC facility publishes research in publicly available research journals; NBAF would publish its research in publicly available research journals as well. Section 3.13 of the NBAF EIS addresses waste management at the proposed NBAF.

Comment No: 12                      Issue Code: 8.2

DHS notes the commentor's question regarding the possible association between local area businesses and the NBAF, if located at the South Milledge Avenue Site. 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, and a discussion of any potential associations between local area businesses and DHS relative to the NBAF is beyond the scope of the NBAF EIS.

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

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- 12 cont.| 8.2 | 13. The Merial vaccine plant is eight miles away from the proposed NBAF site and is being heavily pitched as a major selling point to have the facility located in Athens, GA. Why? Please describe in detail the relationship that NBAF would likely have with Merial if the facility is located in Athens, GA.
- 7 cont.| 27.0 | 14. How many gallons of Foot and Mouth disease live virus are required to manufacture a vaccine? Please describe in detail the process for manufacturing a Foot and Mouth disease vaccine, and what new safety and security measures would be taken if the Athens Merial plant were to produce vaccines in conjunction with NBAF research.
- 7 cont.| 27.0 | 15. Plum Island currently houses The North American Foot and Mouth Disease Bank which keeps vaccine for the United States, Canada and Mexico. Will the Vaccine Bank be moved here? Please describe in detail the contents of the Vaccine Bank and the potential hazard to the environment if its contents are released.
16. The scoping materials read:  
"Athens-Clarke County (ACC) has ample water and sewer capacity to serve the NBAF. ACC can withdraw 35 million gallons per day (MGD) from Bear Creek reservoir and another 28 MGD from the North and Middle Oconee Rivers."  
Yet, currently the area is experiencing a severe drought. Athens Clarke-County, Barrow, Jackson and Oconee counties, draw water from Bear Creek Reservoir. They enacted total outdoor water bans after the Upper Oconee Watershed Authority declared a Level 4 drought in September, 2007. The reservoir has enough water to last about six weeks under current conditions, and the Middle and North Oconee rivers are too low to draw water from regularly or refill the reservoir.
- 13| 12.2 | Include a detailed analysis of the NBAF water requirements, and justify locating it in Athens, GA in the face of extreme extended drought conditions.
- 14| 15.2 | 17. If an outbreak of foot and mouth disease were to occur in Athens or Watkinsonville, would the Department of Homeland Security handle the situation? Who are the first responders in case of an outbreak? Is it Federal or Local? How would quarantine zones be determined? How large a quarantine area would be needed? How many animals would be destroyed? What would be the restrictions on movement into and out of the quarantine area? How would those restrictions economically affect local business and farmers? Would human beings also be quarantined?
- 9 cont.| 23.0 | 18. James Johnson, the NBAF program manager, said at the Manhattan Kansas Scoping Meeting that upwards of 50 armed guards will be assigned to the facility. Would this be true if the lab were located in Athens? Will these be Federal Protective Service agents or hired from a private security firm like Blackwater?
19. Describe the job requirements and screening procedures for these guards, and what type and capabilities of weapons they will be issued. How far from the facility will guards be stationed,

Comment No: 13 Issue Code: 12.2

DHS notes the commentor's water supply and quality concerns and DHS acknowledges current 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 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, an amount consumed by 228 residential homes. The NBAF would be required to comply with numerous regulations that address the risk of pollutants or hazardous substances getting into local surface waters. 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 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 14 Issue Code: 15.2

DHS notes the commentor's concern. A site-specific emergency response plan will be developed and coordinated with the local Emergency Management Plan regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF. Emergency response plans will include the current USDA emergency response plan for foot and mouth disease (FMD) which does not include provisions for human quarantine.

The potential costs for building additional infrastructure would vary with the location and would depend on the capacity of the existing infrastructure to supply the proposed NBAF. How a jurisdiction would choose to finance the construction of the new infrastructure would depend on the current financial health of the jurisdiction and the laws and regulations that govern the financing of capital projects. 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 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.

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9 cont.| 23.0 | and how will they handle innocent intrusions by walkers, hikers, bikers or others-- for example, along the river?

7 cont.| 27.0 | 20. The potential NBAF is being compared to another lab in Athens that already has BSL-3 capabilities, and also to the CDC in Atlanta. Do these facilities also require 50 armed guards? If not, why does NBAF?

9 cont.| 23.0 | 21. Along the perimeter of another biodefense facility at the Dugway Proving Ground in Utah, there are signs that read "Warning Restricted Area. Use of Deadly Force Authorized." Will these signs be posted around NBAF and if so, please define the perimeter around the facility where citizens should be concerned with their safety. What are the indications for the use of deadly force?

22. Where there be a no-fly zone around the facility?

23. We've been told that no animals used for research at NBAF will come out alive. What breeds of animals will be involved in research, where will they be procured, and how many will be killed per month? What will be the medical impacts to the lab animals including their method of destruction and disposal?

4 cont.| 4.2 | 24. One of the criteria the DHS uses in evaluating proposals is that of "Community Acceptance." Earlier this year, according to an April 25th story in the Athens Banner-Herald linked from the UGA NBAF web site, DHS spokesman Chris Kelly is quoted as saying "UGA leaders must incorporate feedback from residents within a 60-mile radius of the site and show that they have either received community input or have a specific plan to draw feedback from area residents" Apart from letters and statements from those with either a financial or political interest in NBAF, how is "community acceptance" defined now? Why was the original plan changed, and why was a distance of 60 miles picked? How was information made available to and feedback drawn from ordinary residents as compared to the Consortium members, who apparently had much earlier detailed knowledge of the proposed facility?

15| 15.0 | 25. Construction jobs and employment are major selling points of NBAF. So far, no exact number or type of jobs has been provided but the DHS to the community. When will we know exactly how many jobs NBAF will provide for local people, and how many workers will transfer from Plum Island? What construction jobs might be handled by federal contractors like Haliburton? What is the likely staffing plan for the facility, listed with pay grades and pay scales? How many positions at the NBAF are expected to be filled by managers, scientific staff (by area of interest; i.e., microbiologists, chemists, etc), clerical staff, building maintenance staff?

26. The Animal Health Research Center for the Veterinary school at UGA is a BSL-3ag facility that was originally proposed in 1978. "The building - designed for the study of infectious diseases in animals and diseases that can spread from animals to humans - took more than a decade to complete while workers rebuilt poorly designed facilities, attorneys battled over who was at fault, and UGA officials looked for money to cover rising costs." ("Beleaguered Animal Facility Awaits University Approval to Open" - Athens Banner Herald, 8/20/07).

Comment No: 15

Issue Code: 15.0

The number of short-term and permanent jobs are discussed in Chapter 3, Section 3.10 of the NBAF EIS. It is expected that approximately 2,700 direct temporary jobs (2,100 for the Plum Island Site) would result from construction of the NBAF, with many of the jobs being filled locally. Between 250-350 permanent jobs would result from operation of the NBAF, with much of the scientific work force relocating to the region.

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According to The Animal Health Research Center's website: "The Center's Biosafety Level 2 (BSL-2) and Level 3 (BSL-3) laboratories on the second floor were fully operational in the summer of 2006. The BSL-3 laboratories and BSL-3-Agricultural animal rooms on the first floor are undergoing commissioning and we expect them to be operational by the fall of 2007."

9 cont.| 23.0 During the construction of NBAF, will there be phased checks of completed sections - ("commissioning") - testing of completed sections rather than just having the facility checked after the whole thing is built?

6 cont.| 26.0 27. In the Athens, GA EIS proposal on page 20, under the section "Favorable Building Costs and Experienced Builders, it says, "Building NBAF in Georgia will result in more facility for the \$451M budgeted due to a low installation cost" and lists several factors, one of them being "successful completion of multiple BSL-3, BSL-3AG and BSL-4 facilities in Georgia, reducing the "fear factor" that escalates costs elsewhere in the country"

Please define what is meant by a "fear factor" and why it would escalate building costs elsewhere in the country?

7 cont.| 27.0 28. Will all the trouble with the construction and completion of The Animal Health Research Center be a factor in the DHS's consideration of Athens for NBAF? How can the consortium promise "low installation cost" when The Animal Health Research Center went \$43 million dollars over budget and is still not fully operational?

2 cont.| 13.2 29. UGA's State Botanical Garden and Whitehall Forest were designated Georgia's 47th Important Bird Area (IBA) in 2006. The Audubon Society's IBA program is a global effort to identify and protect areas important for maintaining bird populations. IBAs are critical to birds during some part of their life cycle.

Since UGA sought this designation, how will it protect the IBA ? The NBAF site area is between the Botanical Garden and Whitehall Forest. Are there any federal, state or local regulations that would prohibit destruction of IBA habitat or wildlife habitat?

30. All onsite bird and wildlife corridors should be identified. How will displaced species be dealt with? EIS should provide a detailed accounting of wildlife species affected by the development of this property, including any which are rare or endangered, and explain how it will avoid or mitigate destructive impacts to wildlife.

16| 18.2 31. The Plum Island lab has "its own drinking wells, oil storage tanks and sewer treatment plant." Under a state permit, it can dump 60,000 gallons of effluent into Long Island Sound each day." Where will the NBAF, a 500,000 square foot facility, dump its waste? What new utilities or upgrades will be necessary, and how will these be financed?

6 cont.| 26.0 32. One of the aesthetic considerations for the Athens community is the viewscape from the adjoining roads, homes and businesses. The DEIS should contain photographs and topographical diagrams showing the existing green space and elevations, and all projected

Comment No: 16 Issue Code: 18.2

DHS notes the commentor's waste disposal concern. Section 3.13 of the NBAF EIS addresses waste management at the proposed NBAF. Waste management impacts common to all of the alternative sites are addressed in Section 3.13.2, waste management impacts under the No Action Alternative (i.e., at the existing Plum Island Animal Disease Center) are discussed in Section 3.13.3, and waste management impacts at the South Milledge Avenue Site are discussed in Section 3.13.4. Operation of the NBAF at the South Milledge Avenue Site would generate wastewater; waste solids; and medical, hazardous, and industrial solid wastes. Impacts related to these wastes are similar under all action alternatives and are described in Section 3.13.2.2 along with proposed treatment methods for animal carcasses and pathological wastes. Specific information regarding disposal of sanitary wastewater and disposal of waste solids at the South Milledge Avenue Site is presented in Section 3.13.4.2.

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6 cont. | 26.0 | clearing lines and construction to scale, including all surrounding walls or security fences. It should present several alternatives for construction design of the structures and parking facilities--one of which should be an underground option for the research buildings and for parking.

17 | 7.2 | 33. Will there be 24 hour lighting? Show proposed lighting alternatives on detailed maps, including the light pollution aspects of lighting on nearby businesses, roads and residences.

2 cont. | 13.2  
9 cont. | 23.0 | 34. Athens-Clarke County is designated a Tree City by the Arbor Day Foundation. How many trees will be removed from the site? Detail any regulations concerning the size and species of any specimen trees that must be left onsite. Provide a detailed landscaping plan and lists of the size and species of replacement trees and shrubbery, and lists of screening materials to be used on border areas.

18 | 22.2 | 35. A mitigation plan for impacted cultural resources should be provided. An archaeological survey should be performed and found historical resources should be excavated and safeguarded. Historic and cultural sites should be identified and construction in these areas avoided.

1 cont. | 5.2 | 36. Justify why this piece of land contain less--even up to half the acreage--of other sites under consideration, including one that is an island.

Why was Whitehall Farm, a pristine agricultural area bordering a river proposed for the project, instead of an industrial or business park? Please explain in detail why this is the safest and most appropriate place in the Athens area in which to locate this facility.

19 | 6.2 | 37. In exchange for environmental destruction of property bordering the State Botanical Garden, show on any remaining project site land any area that will be devoted to greenspace / passive outdoor recreation for employees and/or the public, should NBAF be built in Athens.

3 cont. | 6.2 | 38. What will become of the equine facility and classrooms just constructed a few years ago on this site? In an extended drought, using the pastureland for grazing for UGA's stable of horses would appear to be the "highest and best use" of this property, which actually is its current use. Explain why the 500,000 sq ft NBAF facility, with all the attendant environmental destruction, would instead be the "highest and best use" of this property.

39. Since this site was chosen instead of an industrial park or site many miles away from public view, the surrounding neighborhood must be taken into consideration when designing the facility, from an aesthetic viewpoint. Since it adjoins the equine facility, please present as one alternative a plan that would complement that building in color, materials and exteriors. (Think "red barn" instead of industrial metal box)

20 | 17.2 | 40. What changes will be made to the already dangerous triangle at the intersection of Whitehall, South Milledge and Simonton Bridge? What traffic studies will be done, and how will downtown Watkinsville be impacted during and after construction?

Comment No: 17 Issue Code: 7.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature including at night due to lighting and would alter the viewshed of the area. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigative measures, such as shielded lighting, will be considered in the final design of the NBAF.

Comment No: 18 Issue Code: 22.2

DHS notes the commentor's concerns regarding cultural resources. Section 3.9 discusses cultural resources. Coordination letters with the State Historic Preservation Officers are included in Appendix G.

DHS notes the commentor's concerns. Section 3.6 describes the potential impacts to surface water.

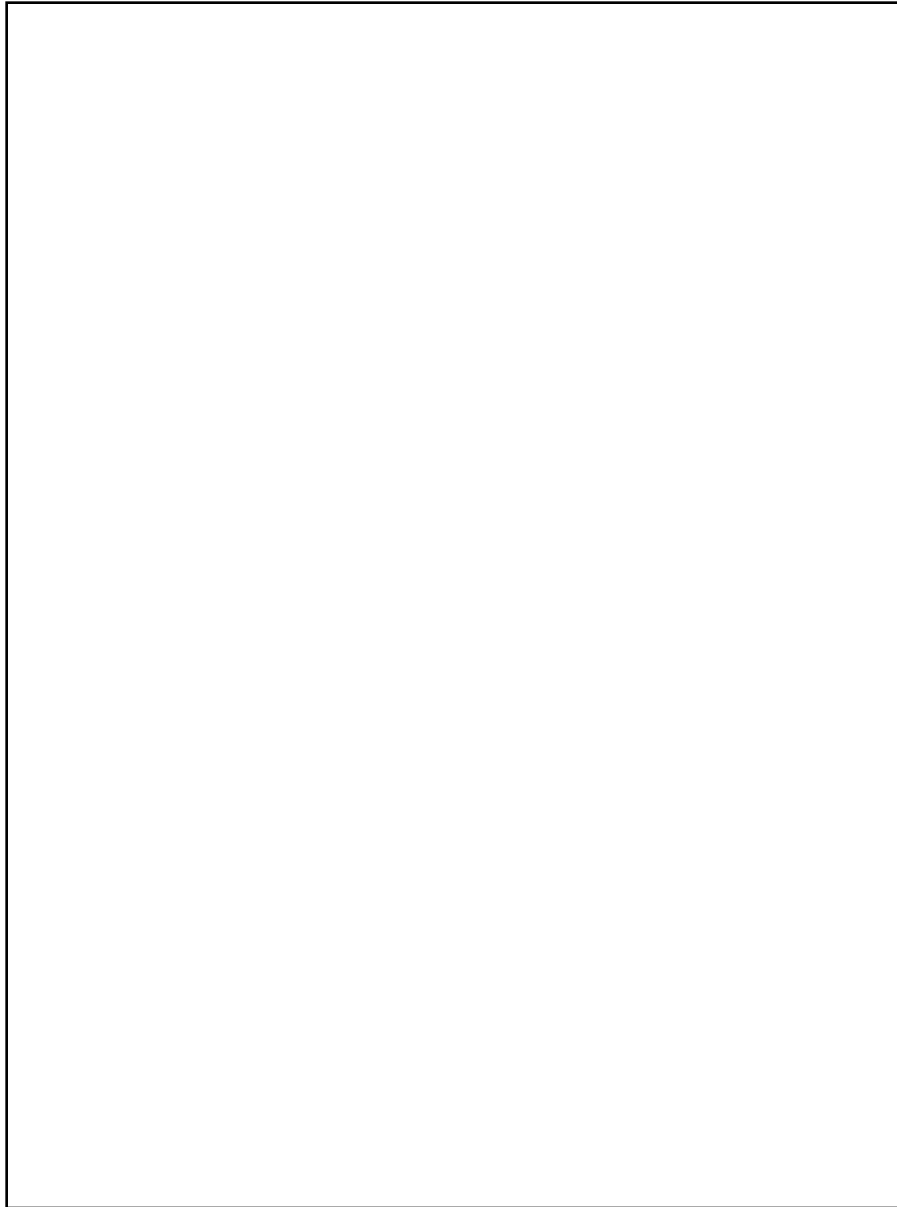
Comment No: 19 Issue Code: 6.2

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.

Comment No: 20 Issue Code: 17.2

DHS notes the commentor's concern about the traffic congestion in the area of the South Milledge Avenue Site Alternative and the future impact of the NBAF operation on the area's transportation infrastructure. A discussion of the planned improvements to the area's primary transportation corridors of South Milledge Avenue and Whitehall Road to alleviate current and future traffic congestion resulting from the NBAF operation at the South Milledge Avenue Site Alternative is located in Section 3.11.3.3.1 of the NBAF EIS. All planned improvements are per the recommendations of the Department of Transportation and the Public Works Department.

DHS notes the commentor's concerns regarding the handling and transport of packages containing pathogens. The general regulations governing the required NBAF transport of packages containing pathogens, and a discussion of the low risk associated with the shipment of infectious materials is provided in Section 3.11.9 of the NBAF EIS. More detailed information on the regulatory requirements, packaging / handling procedures, documentation / labeling procedures, and notification requirements for the transport of pathogens is provided in Section 2.2.2.3 of the NBAF EIS. Additionally, an analysis of accidental releases during transportation is provided in Section 3.14,



Health and Safety and Appendix E of the NBAF EIS. In terms of notification, the Centers for Disease Control and Prevention and the recipient of the package will be the only ones notified when pathogens are shipped. Information regarding the existing road conditions and potential effects to traffic and transportation from the South Milledge Avenue Site is provided in Section 3.11.3 of the NBAF EIS.

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13 cont. | 12.2 | 41. Calculate the amount of impervious surface that will be created onsite, and detail the hydrological impacts of the subsequent runoff as well as consequences to the Oconee River and its inhabitants for the pollution and soil erosion created by construction. Detail the short, long-term and cumulative impacts upon the river and its inhabitants, and present a mitigation plan.

18 cont. | 22.2 |  
20 cont. | 17.2 | 42. What provisions will be made for the importation of pathogens from Plum Island or elsewhere? How will these be transported, and will the process be made public? How will the community's right to know be balanced with security against terrorism concerns during transporting processes? Explain why the proposed lab would not present an attractive terrorist target, and/or how such attacks could be avoided or mitigated short of a No Action option in Athens.

14 cont. | 15.2 | 43. Discuss how the local taxpayer will be financially impacted by the pre-construction area upgrades, construction and operation of the NBAF lab, and present a detailed justification for the claims of short- and long- term economic benefits of this project to the Athens metropolitan area.

I submitted the following commentary to our local alternative newspaper Flagpole on 7/18/08. It was not published:

7 cont. | 27.0 | Last week, government watchdog/author Russ Kick posted the NBAF feasibility study on his blog "The Memory Hole." The 366-page document was prepared for the Department of Homeland Security by the NBAF Design Partnership – an ad-hoc Atlanta-based group of architectural engineers that was awarded 2.4 million dollars to do conceptual design work for the proposed facility.

Kick obtained the document through a Freedom of Information Act request. I'm kind of envious because a few months ago I filed a FOIA to try to get hold of a letter the DHS sent out in March asking NBAF finalists to sweeten the pot. Word had leaked out that DHS was asking all the candidates for their best final offers of – additional requirements they would need to bring the 525,000 square foot germ lab to a town near you - and they had until the end of the month to reply. The answer I received from DHS was not as forthcoming as Kick's. It contained three exemptions explaining why the feds were not obligated to release the list of requirements (it would mess up the bidding process, don't 'cha know). They did release a cover letter – informing UGA's Dr. David Lee that since March 30<sup>th</sup> fell on a Sunday, the postmarked due date was officially extended to the 31<sup>st</sup>.

In short, I got squat.

So it was with great interest that I perused the document which Kick says he was "surprised and delighted" to receive in completely uncensored form. There's lots of stuff here that's included in the nearly impenetrable behemoth of the recently released Draft Environmental Impact Study, and some stuff that's not (mention of Avian Influenza, Newcastle Disease and White Tailed Deer being studied at NBAF is all new to me) but there's one thing that grabbed my attention right off the bat.

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In the table of acronyms, there was something called a "SCIF".

Later on, under the section for Engineering, the feasibility study says that "*Security for the National Bio and Agro Defense Facility (NBAF), as outlined below, will be based on the following standards and guidelines: Director of Central Intelligence Directive (DCID) 6/9, Physical Security Standards for Sensitive Compartmented Information Facilities (SCIFs), effective 11/18/2002, with administrative corrections dated 12/23/2002.*"

It goes on to say: "*NBAF will have one central SCIF conference room.*"

So what the hell is a SCIF?

7 cont.,| 27.0

A SCIF (pronounced "skiff") is a "Sensitive Compartmented Information Facility" which would house SCI (I don't know how this is pronounced. "Sigh"?). - "Sensitive Compartmented Information". The government defines Sensitive Compartmented Information as "***Classified information concerning or derived from intelligence sources, methods, or analytical processes, which is required to be handled exclusively within formal control systems established by the Director of Central Intelligence.***" *Newbold's Biometric Dictionary for Military and Industry* tells us "***Moreover, programs handled under the SCI paradigm are normally not acknowledged by the US government.***"

I remember when Ed Hammond of The Sunshine Project was here in Athens and said the new NBACC (pronounced "En-Back" -the soon-to- be-opened National Biodefense Analysis and Countermeasures Center at Fort Detrick in Fredrick, Maryland ) would be a SCIF. According to the Washington Post in 2006: Homeland Security officials plan to operate all 160,000 square feet of NBACC as a SCIF. "Because of the building's physical security features -- intended to prevent the accidental release of dangerous pathogens -- it was logical to operate it as a SCIF," said Maureen McCarthy, Homeland Security's director of research and development.

During the past year, transparency has been a big selling point to quell any fears the community may have about the Department of Homeland Security bringing NBAF to Athens. At the DHS hosted February 19<sup>th</sup> Town Meeting, a slide in the presentation by The Department of Homeland Security read:

*"Would the NBAF research be conducted in secret?"*

- There would be no classified research, but occasionally the NBAF could support classified FBI forensic investigations.*

- Just as at PIADC, (Plum Island) research at the NBAF would be published in publicly available scientific journals."*

Commissioner Elton Dodson has told us "All the work will be transparent. The results of these studies will be peer- reviewed and published in research journals. The public will have full



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knowledge of the activities. If the feds suggest that this will not happen, my support will likely change."

The UGA website reads: "There will be no classified work at the NBAF."

7 cont. | 27.0

So despite assurances from The DHS, our local officials and UGA that NBAF will be transparent and that all research will not be classified, it turns out this may not be the case after all. What will go on in the SCIF conference room? If the proposed SCIF *is* intended for forensic FBI investigations and we don't know the scope of such activities, couldn't any kind of stuff that suits the needs of both agencies – the DHS and the FBI - be researched at NBAF in secret?

And in the end, is any agency "transparent" when it doesn't disclose programs which it can not even admit exist in the first place? Is not the ultimate secret not even admitting you have one?

I could find no mention of the SCIF conference room in the DEIS.

Lots of things have changed since we first learned of NBAF:

- First they told us teaspoons of live virus would be used there; now it's liters.
- The billions of economic development shrank to millions, while the water usage grew to an additional 10 to 20 million gallons per year.
- We were told all questions submitted during the scoping period would be answered in the DEIS, but many weren't. The DEIS doesn't even tell us what method will be used for infected animal disposal.
- The *Red and Black* reported details of a lawsuit filed against the University by a visiting scientist, alleging that UGA used "fabricated data from published research resulting in more than \$1 million in federal grants for the University," and allegedly casting an air of distrust around the entire NBAF process.
- Another DHS slide at the February Town Meeting read "A total of about 250 to 350 employees would be employed at the NBAF, many from the local community." But DEIS figures show that those "many" jobs are now estimated at 69 positions.
- And though no one saw fit to bring it up, we really should have know that to study deadly viruses carried by mosquitoes, you're going to need lots of mosquitoes to infects with deadly viruses. And ticks. And black biting flies and other vectors. All of which will be housed in NBAF's insectary.

So with all these changes, who's to say whether the SCIF mentioned in the feasibility study for NBAF will just remain one conference room, or at some point expand to include the entire facility, just like NBACC?

We'll all have one more chance to have our questions heard by DHS come the August 14<sup>th</sup> meeting. From what we've learned so far, it's highly unlikely those questions will actually be *answered*. But perhaps we should take a shot anyway by asking DHS just what they mean by "transparent" this time around.

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*Matt DeGennaro is a freelance writer who lives within the dreaded "Infected Zone." To see if you do too, go to the DEIS and check out Figure 3.14.4.1-2 — Far Field Distribution of Viral Pathogens Based On Time-Integrated Atmospheric Transport.*

I submitted the following oral comments at the August 14<sup>th</sup>, 2008 DEIS meeting. I would like to submit them as written comments as well:

1 cont. | 5.2 | You were misled by the consortium on one of the criteria for selecting a site for NBAF. There was – and continues to be - no community acceptance of this project.

On January 16, 2006 The Department of Homeland Security published a request for Expressions of Interest in The Federal Register. It called for proposals from "Federal agencies, State and Local governments, industry, academia, interested parties and organizations for potential locations that would accommodate the construction and operation of the NBAF"

The Federal Register said "DHS will evaluate each EOI submission using 4 site criteria categories (research capabilities, workforce, acquisition/construction/operating and **community acceptance**) to determine if it should be further evaluated as part of the site planning process."

NBAF was described in the Federal Register as "an integrated human, foreign animal, and zoonotic disease research, development and testing facility" Interested parties had until March 31, 2006 to submit their Expression of Interest to the DHS.

Governments across the country scrambled to establish groups to lure NBAF to their towns. They had only three months to come up with their best pitch. In Georgia, The Georgia Consortium for Health- and agro-security was thrown together. They pitched two sites in Athens – College Station Rd. as their "primary site" with south Miledege as their secondary site.

In the Executive Summary for Georgia's expression of interest it states "Importantly, Georgia also has an appropriate local work force and **broad-based community support** to guarantee the success of NBAF" Later on, under the heading "Community Acceptance" we read "**Georgia wants NBAF**" In letters of support attached to the expression of Interest, addressed to Homeland Security director Michael Chertoff, our local officials from our governor to our mayor welcomed NBAF. As our representatives, all used to word "we" in their support and welcome. Mayor Davison wrote "we stand ready to accept this facility and are prepared to assist in anyway we can"

Well, in March 2006 Georgia not only didn't want NBAF, we had no idea what the hell NBAF was.

The first meeting that was open to the entire community was held almost a year and a half later on August 30, 2007.

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Despite lack of community knowledge or acceptance, when the DHS came to inspect the sites six months earlier (April 24, 2007) Mayor Davison told the DHS “that UGA leaders have done a good job keeping people informed about the proposal and because Athens has a very educated and engaged citizenry, the public has kept a close eye on the proposal and what it will mean for the community, she said.” (ABH)

Informing the community did seem to be part of the plan at one point. That same ABH article says Homeland Security spokesman Chris Kelly saying that “UGA leaders must incorporate feedback from residents within a 60-mile radius of the site and show that they have either received community input or have a specific plan to draw feedback from area residents,”

When I asked David Lee about this in an email exchange and at the August 30<sup>th</sup> meeting, he called this “misinformation”

And factual information was hard to come by. Jeff Wilson publisher of our local paper The Athens Banner is on the board of The Athens-Clarke County Economic Development Foundation – which itself is a member of the Georgia consortium. With news headlines like “UGA touts sites for defense lab as Chambliss visits” and “UGA chief likes biodefense chances” “Senators hoping Georgia’s assets’ will win fed lab” and editorials tilted “Defense facility seems a natural fit for university” and “Biotechnology dreams could become reality”

The community was never presented with a clear picture of what NBAF was or what potential risks it might have. We were just told what a great thing it would be, even up to this morning’s paper. With the discovery yesterday of a captured terrorist possessing maps of Plum Island - The news this morning might read “NBAF a possible terrorist target” instead it reads “NBAF Salaries at top end of local scale”

21| 25.2 | But make no mistake – you have been grossly misinformed – when the consortium told the DHS there was “broad based community support” there wasn’t even community knowledge. And if Athens is selected as the site to build the world’s largest bsl-4 lab, this community will do whatever it takes to prevent this from happening.

In closing I would like to submit the following internet link as a comment:

[http://www.youtube.com/watch?v=xJB\\_QS93KBY](http://www.youtube.com/watch?v=xJB_QS93KBY)

7 cont.| 27.0 | It is an AP Video from April 11, 2008 entitled “Plum Island: Deadly Diseases on the Move?” where former Plum Island director Roger Breeze is quoted as saying “It goes against the main aspect of the safety program for the past 50 years” and “it seems a little bit odd to be relocating the lab in an agricultural area where there are lots of animals”

Comment No: 21

Issue Code: 25.2

DHS notes the information submitted by the commentor.

**DeGennaro, Matt**

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**WD0858**

Respectfully submitted,

Matt DeGennaro

DeLong, Janet

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WD0338

**From:** Janet DeLong [REDACTED]  
**Sent:** Monday, August 18, 2008 10:02 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF Proposed Site in Manhattan KS

1|25.4; I want to vote "No" on putting the NBAF facility in Manhattan KS. I feel the possible health  
 2|21.4 risks to the community at large outweigh any economic gain. Quality of life is more important  
 than money.

Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 21.4

DHS notes the commentor's concern. Chapter 1, Section 1.1 of the NBAF EIS identifies DHS's mission as the study of foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The goal or benefit of NBAF is to prevent these animal diseases from spreading in the United States through research into the transmission of these animal diseases and the development of diagnostic tests, vaccines, and antiviral therapies. DHS also notes the commentor's concerns regarding the risks associated with the proposed NBAF operation at the Manhattan Campus Site. 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. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in 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, 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.

DePaola, Brett

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WD0615

**From:** DePaola, Brett D. [REDACTED]  
**Sent:** Saturday, August 23, 2008 2:46 PM  
**To:** NBAFProgramManager  
**Subject:** NBAF in Manhattan, KS -- NO!

To Whom It May Concern,

1|25.4 | I was invited to write to you by the KansasBio organization. They have in mind that I should write something in support of their proposal to have the NBAF located in Manhattan, KS. In fact, I would prefer to do the opposite.

2|21.4 | I believe it is true that Manhattan and Kansas State University will provide the infrastructure that you may be looking for. However, my concerns of containment loss greatly outweigh those considerations. Look, we already have a level 3 facility here, and that already scares me. In no way do I want to go to level 4! We are sitting in the middle of an extremely important agricultural area. It makes no sense at all to risk contamination of this region with even the remote possibility of loss of containment of diseases that we \*know\* will cause utter devastation!

It seems to me that you should put a facility like this in some barren wasteland, not in the middle of the most at-risk regions of the US!

I know all about the supposed safeguards. We've had all of that explained to us. (Of course, similar safeguards existed at what we know know was the "home" of the anthrax problem!) We recently had a tornado come through Manhattan, KS. It did severe damage to our reactor building. I was not worried about health risks because of the very nature of our type of reactor. On the other hand, having a facility like NBAF getting hit by a tornado is extremely frightening to me! (Air dispersal of pathogens!!) Also, I never underestimate the power of people, even top scientists, to screw up. It happens all the time in facilities across the country. I myself am a scientist and I am the first to admit that, unfortunately, these things happen.

Do we really want it to happen, as it ultimately will, right in a region where such an accident could cause the greatest damage??? I think not.

Anyhow, these are my opinions and the opinions of many of my colleagues, both scientist and non-scientist. (I note that nobody in either the university, state, or city administration sought our opinions before they submitted their proposals...)

I urge you NOT to place the NBAF facility in Manhattan, KS \*or\* anywhere else where significant damage to our agricultural well being can happen\* from an ultimately inevitable accident.

Sincerely,

Brett DePaola  
 [REDACTED]  
 [REDACTED] KS [REDACTED]

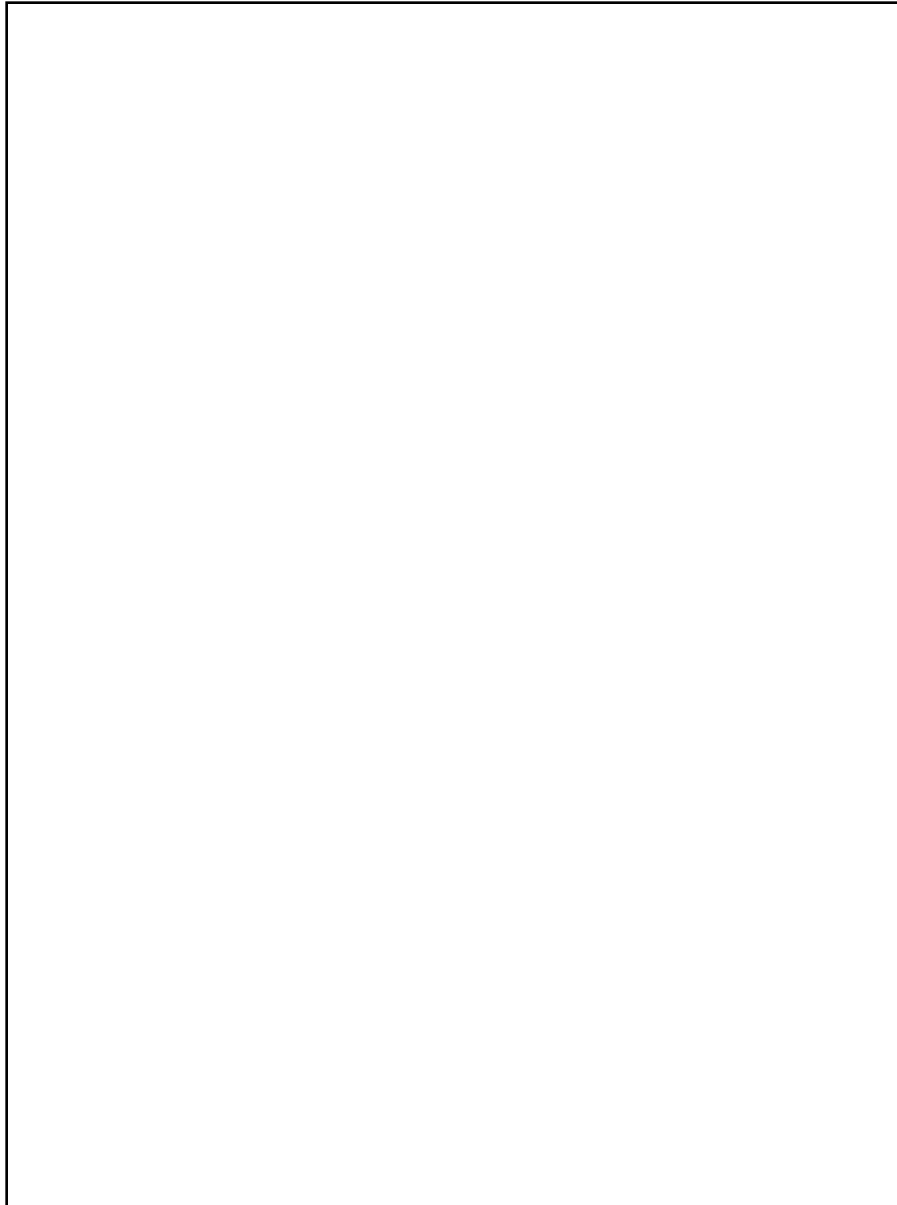
Comment No: 1                      Issue Code: 25.4

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

Comment No: 2                      Issue Code: 21.4

DHS notes the commentor's concern regarding the potential consequences from a NBAF accident or pathogen release as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B of the NBAF EIS provides a comprehensive list of BSL-3 and BSL-4 laboratory accidents results, and consequences of the accidents Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. 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. 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, 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.

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



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

Derry, Jeff

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WD0115

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**From:** jeff derry [REDACTED]  
**Sent:** Saturday, July 26, 2008 4:56 PM  
**To:** NBAFProgramManager  
**Subject:** Butner, NC site

1| 24.3 | I vote 'FOR' the site of the National Bio and Agro-Defense Facility (NBAF) being located in Butner North Carolina.

Jeff Derry  
[REDACTED] NC

Comment No: 1      Issue Code: 24.3  
DHS notes the commentor's support for the Umstead Research Farm Site Alternative.



Diaz, Ane

Page 1 of 1

WD0427

**From:** ane diaz [REDACTED]  
**Sent:** Thursday, August 21, 2008 2:24 PM  
**To:** NBAFProgramManager  
**Subject:** WE DO NOT WANT YOU ION OUR COMMUNITY < STAY AWAY FROM ATHENS

To Whom It Might Care about Community:

It is obvious to me that the people that are supporting this monstrosity being place in Athens , have no concern or respect of our community.

1| 15.2

They also seems to be unaware that they could esaely bankrupt the county that is solely dependent on their tax payers ( home /business owners ) to support and maintain our beautiful town. The University already does not pay for utilities and water, so all the expenses go to the real citizens of athens ( neither students or UGA pay for what makes this town so special). Our children's educational system is one of the worst in the nation, but the despot Mayor, UGA, DHA and NBAF are more concern of their immediate cash flow and salaries , than any of the issues that this irresponsible Mayor and some of the commissioners were hired to take care of. As a home owner and tax payer, I see Athens having very immediate needs and YOU are not one of them. What makes you people think that with the economic conditions , all your lies about jobs, all your promises about " all will be OK" and all your secrecy, that anyone would trust you would take care of the

2| 2.0

community in case of an emergency.... and please, do not mention FEMA , the whole nation knows what they can do....NOTHING!!!

3| 25.2

YOU ARE NOT WELCOME TO OUR COMMUNITY!

DO THE RESPONSIBLE THING AND STAY OUT!!!!!!!

Sincerely,

Ane Diaz  
 [REDACTED] GA

Comment No: 1                      Issue Code: 15.2

DHS notes the commentor's statement. A discussion of socioeconomic is presented in Section 3.10 of the NBAF EIS.

Comment No: 2                      Issue Code: 2.0

DHS notes the commentor's lack of confidence in the DHS. DHS has made every effort to explain the operational aspects and potential impacts of NBAF and has conducted a thorough and open public outreach program in support of the NBAF EIS that exceeded NEPA requirements. 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.). Since the inception of the NBAF project and beginning with the release of DHS's request for Expressions of Interest (EOI) on January 19, 2006, DHS has supported a vigorous public outreach program and has been as forthcoming as possible in disseminating information about NBAF as program planning has matured over time.

The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the NBAF EIS. The risk of an accidental release of a pathogen is extremely low. Once the Record of Decision has been signed and prior to the initiation of NBAF operations, a site-specific emergency response plan will be developed and coordinated with the local Emergency Management Plan regarding evacuations and other emergency response measures for all potential emergency events including accidents at the NBAF.

Comment No: 3                      Issue Code: 25.2

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

Dickerson, Harry

Page 1 of 1

WD0591

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**From:** [REDACTED]  
**Sent:** Sunday, August 24, 2008 11:13 AM  
**To:** NBAFProgramManager  
**Subject:** Support for NBAF in Athens GA site.

Dear Dr. Johnson:

1|24.2 | I am writing in support of building the proposed DHS NBAF in Athens, GA. This site has the science as well as local government and community support for this facility.

Harry W. Dickerson


Comment No: 1

Issue Code: 24.2

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

Diedrich, Guy

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TXD011

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<p>Texas A&amp;M University                  Prairie View A&amp;M University                  Tarleton State University                  Texas A&amp;M International University                  Texas A&amp;M University-Corpus Christi                  Texas A&amp;M University-Kingsville                  West Texas A&amp;M University                  Texas A&amp;M University-Commerce                  Texas A&amp;M University-Texarkana                  The Texas A&amp;M University Health Science Center                  Texas Agricultural Experiment Station                  Texas Engineering Experiment Station                  Texas Cooperative Extension                  Texas Forest Service                  Texas Engineering Extension Service                  Texas Transportation Institute                  Texas Veterinary Medical Diagnostic Laboratory</p>	<p>124.6 218.6 11</p>	<p>August 6, 2008</p> <p>The Honorable Jay Cohen                  Undersecretary for Science &amp; Technology,                  And Selection Authority, National Bio and Agro Defense Facility                  Department of Homeland Security                  245 Murray Lane Southwest, Building 410                  Washington, D.C. 20528</p> <p>Dear Admiral Cohen,</p> <p>Thank you for the opportunity to express The Texas A&amp;M University System's strong support of the location of the National Bio and Agro Defense Facility (NBAF) in San Antonio, Texas.</p> <p>The Texas A&amp;M University System is one of the largest systems of higher education in the nation, with a statewide network of nine universities, seven state agencies and a comprehensive health science center. The A&amp;M System educates more than 105,000 students and reaches another 15 million through service each year. With nearly 27,000 faculty and staff, the A&amp;M System has a physical presence in 248 of the state's 254 counties.</p> <p>The A&amp;M System encourages innovation and discovery. Faculty in the A&amp;M System had more than \$627 million in research expenditures in FY2007.</p> <p>The A&amp;M System has many resources that will naturally tie into the location of the National Bio and Agro Defense Facility in San Antonio. A few examples of areas that can provide support through students, staff, research collaborations are:</p> <p><b>The College of Veterinary and Biomedical Sciences:</b></p> <ul style="list-style-type: none"> <li>• The College of Veterinary Medicine and Biomedical Sciences was established in 1916 and today is one of the top five in the country.</li> <li>• Access to students - One of every 10 practicing veterinarians in the United States has an Aggie diploma. The faculty and staff of the college are committed to exceptional teaching, research and patient care. Our students are truly the "best" from the nearly 500 carefully selected students in our DVM program, to the 2250 students in our superb undergraduate Biomedical Science Program to the 150 outstanding graduate students participating in quality research programs throughout the college. Our research addresses significant problems in both animal and human health, which impacts both Texas and the entire nation.</li> </ul>
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Comment No: 1                      Issue Code: 24.6  
 DHS notes the commentor's support for the Texas Research Park Site Alternative.

Comment No: 2                      Issue Code: 8.6  
 DHS notes the information provided by the commentor.

Diedrich, Guy

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**Texas A&M University Institute for Preclinical Studies (TIPS)**

- Located near the College of Veterinary Medicine & Biomedical Sciences and the headquarters for the Texas A&M System Health Science Center, the facility slated to be completed in June 2009 will focus on research and education and will feature a vast array of multi-disciplinary programs that will play a key role in training veterinarians, physicians, scientists, engineers and technicians in a variety of medical and research-based initiatives.
- The TIPS facility is focused on translational research that will enable breakthroughs in new discoveries, especially medical devices and therapies, so that they can move more quickly from concept to the marketplace.

**Texas Institute for Genomic Medicine (TIGM)**

- The Texas Institute for Genomic Medicine is currently in operation at the Institute for Biosciences and Technology in Houston with its College Station facility opening by the end of the year. The new facility is adjacent to the College of Veterinary Medicine & Biomedical Sciences and the Texas A&M University Institute for Preclinical Studies. Their combined libraries will constitute the largest knockout mouse embryo library of its kind in the world.

**Texas A&M University - San Antonio**

- New university campus that will one day serve 25,000 students in San Antonio. It currently operates as a Center under the Texas A&M University-Kingsville.

**Texas A&M University - Agriculture Program**

- One of the premier agriculture programs in the United States with over 6,000 students currently enrolled in degrees ranging from Animal Science to Biological and Agricultural Engineering to Plant Pathology and Microbiology.

The A&M System looks forward to providing all the necessary resources through students, staff and collaborative efforts to support the location of the National Agro and Bio Facility in San Antonio, Texas.

Respectfully submitted,



Guy K. Diedrich  
Vice Chancellor for Federal Relations and  
Technology Commercialization

2/8.6  
cont.

02/20