

Goodrum, Katie

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WD0866

From: Katie Goodrum [REDACTED]
Sent: Monday, August 25, 2008 10:21 PM
To: NBAFProgramManager
Subject: NO to NBAF in Athens!

1| 5.2 | NO to NBAF in Athens! It is my [REDACTED] and Athens is a terrible
 choice for the facility. The site is near a major river as well as
 2| 12.2 | livestock research areas, so any escaped pathogens will spread easily.
 The community will greatly resent it. Please keep facilities such as
 3| 5.0 | these on islands, if you must keep them at all.
 Thank you,
 Katie Goodrum

Comment No: 1 Issue Code: 5.2

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

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's river concern. The NBAF EIS Section 3.7.3 describes the water resources at the South Milledge Avenue Site alternative and the potential construction and operational consequences including measures to prevent or reduce effects of stormwater runoff or spills.

DHS notes the commentor's views on risk. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen.

Comment No: 3 Issue Code: 5.0

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

Goza, Kenny

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WD0670

From: GOZA, KENNETH W [REDACTED]
Sent: Monday, August 25, 2008 3:01 PM
To: NBAFProgramManager
Subject: Support

Greetings

1|24.5; This letter is written in support of the National Bio and Agro-Defense facility, which is considering
 2|19.5; Flora, Ms as a possible construction site. We believe this would be a great site for this facility.
 As we understand this facility is safe and secure.

3|15.5; As for our State; we have a great quality of life and people will want to move here to work in
 collaboration with the NBAF. Also we would truly be interested in the opportunity for new jobs coming
 into our State.

1Cont.124.5; We would very much appreciate Mississippi being the site for this project.

Kenny Goza

Comment No: 1 Issue Code: 24.5

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

Comment No: 2 Issue Code: 19.5

DHS notes the commentor's support for the NBAF and understanding that the proposed research would be safely conducted at the Flora Industrial Park Site.

Comment No: 3 Issue Code: 15.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative. The quality of life of the three-county region is discussed in Section 3.10.5 of the NBAF EIS. The proposed action will create temporary jobs during the 4-yr construction phase and permanent jobs upon completion of the facility. The economic effects of the NBAF at the Flora Industrial Park Site are included in Section 3.10.5.

Graham, Cheri

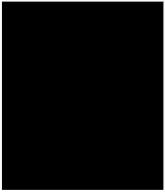
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WD0134

From: Cheri Graham [REDACTED]
Sent: Thursday, July 31, 2008 3:43 PM
To: NBAFProgramManager
Subject: Manhattan, Kansas

1|25.4; You get a STRONG "NO" vote from me. Keep it on Plum Island. I can not be persuaded.
2|24.1

Cheri Graham



Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 24.1
DHS notes the commentor's support for the Plum Island Site Alternative.

Graham, Cheri

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WD0761

From: Cheri Graham [REDACTED]
Sent: Monday, August 25, 2008 3:31 PM
To: NBAFProgramManager
Subject: Manhattan Kansas

1) 25.4 | No to NBAF on the mainland and especially not in Manhattan, Kansas. Human element is the greatest risk.
2) 21.4 |

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the five mainland site alternatives including the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 21.4

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

Graham, John

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PD0246

August 23, 2008

My name is John Graham and I'm calling in support of the Manhattan, Kansas location for NBAF.

1|24.4

After reading the environmental impact statement, I am convinced that Manhattan, Kansas is by far the strongest of the locations being considered. In fact near a perfect location with all the research and related activities that is going on at Kansas State University and the Manhattan area.

And wanted to register that support knowing that some of the opponents are providing information that is not accurate.

Comment No: 1

Issue Code: 24.4

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

Gray, Anna

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WD0752

From: Anna C. Gray [REDACTED]
Sent: Monday, August 25, 2008 2:55 PM
To: NBAFProgramManager
Subject: Concerning NBAF in Athens

1|25.2 Hello, I wanted to make this comment concerning the placement of the NBAF facility here in Athens, Georgia. I am adamantly against it being put into such a closely populated area of not only people but also the animals who live in the area.

2|21.2 I work in the summer months in the UK and was there in the spring and summer of 2002 when the outbreak of hoof and mouth disease devastated the agricultural landscape, ruined farm communities, destroyed rare breeds and cost the life of millions of healthy animals. Having had this experience, I was shocked to read that at one of the meetings this year concerning the placement of the facility here in Athens it was stated that the only disease that could effect humans was hoof and mouth disease and that would only cause minor flu like symptoms. What about the OTHER animals who live within a 5 mile radius of the facility. If the rules are the same for the US as they are for the EU, and I suspect they are, then every cow and sheep within a five mile radius of the facility would have to be culled and killed. That would not be acceptable to me. The risk is not acceptable to me. Human error is too much of a factor to take that risk other than seriously.

1|25.2 I say NO to the placement of the NBAF site in Athens.
 (cont.) Furthermore, if the city government and university powers that be are willing to make 58,000 gallons of water a day
 3|12.2 available for this facility then why were they not willing to do so for the struggling businesses that failed this past year due to the drought. Some of those businesses had been in Athens for over 35 years. Absolutely NO to the usage of so much water to such a facility when Athens businesses were allowed to dry up and die. Where is their loyalty? Where is the fair distribution of water for everyone.

4|5.2 And lastly, we do not need a high security facility near a state park facility, The State Botanical Garden. Again, too much human error with too much risk. Put the facility in an area where there is a reduced population of not only humans but animals. Let such a facility bring revenue to an area that is not so depressed by drought as the Athens area.

1|25.2 I say NO to the building of the NBAF site in Athens.
 (cont.) This message is sincerely from a human living within a 5 mile radius of the proposed NBAF site.

Anna C. Gray
 [REDACTED]

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 21.2

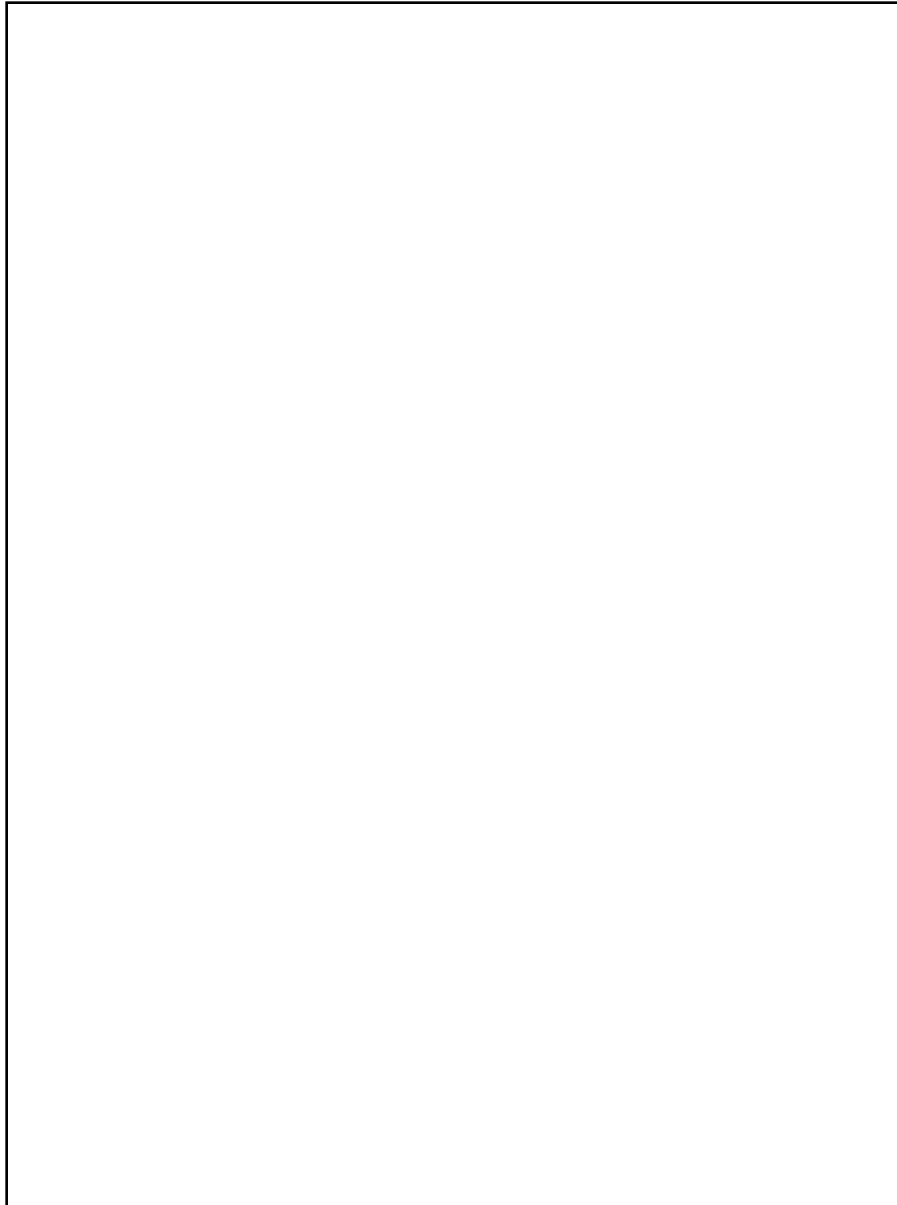
DHS notes the commentor's concern. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. As examined in Section 3.14 and Appendix E of the NBAF EIS, the risk of an accidental release of a pathogen is extremely low. DHS is aware of the historic biosafety lapses and will consider these events to improve the structural and engineered safety of the final NBAF design and to incorporate lessons learned from incidents of human error into the operating procedures. The EIS economic (Section 3.10 and Appendix D of the NBAF EIS) and risk analysis (Section 3.14 and Appendix E of the NBAF EIS) acknowledge and assess the accidental Foot and Mouth Disease (FMD) releases in Great Britain. The proposed NBAF design would incorporate engineering features and operational procedures to prevent or mitigate an accidental or deliberate pathogen release from any of the BSL laboratories within the NBAF. %Appendix B to the NBAF EIS describes biocontainment lapses and laboratory acquired infections in the United States and world-wide. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF then site specific protocols 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.

Comment No: 3 Issue Code: 12.2

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

Comment No: 4 Issue Code: 5.2

DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. A change in land use would occur; however, current zoning regulations allow for this type of development. The South Milledge Avenue Site is currently zoned as "Governmental", and construction and operation of the NBAF is consistent with this designation. However, the Clarke County Comprehensive Plan designates the South Milledge Avenue Site as "rural", so an amendment to the comprehensive plan may be required. This information has been added to the NBAF EIS in Section 3.2.3. DHS and USDA ensure that the NBAF operation at the South Milledge Avenue Site will comply with all applicable local, state, and Federal regulations and



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

Gray, Janet

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CD0403

From: [REDACTED] Janet Gray [REDACTED]
Sent: Tuesday, August 12, 2008 12:57 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1) 25.2 We are strongly opposed to having NBAF in our community of Athens, GA. The DEIS discloses an "insectary" where disease-spreading mosquitoes and other "vectors" will be bred. It also discloses that any release of pathogen, because of our warm, humid climate, could cause the disease to become permanently established in our community.

2) 21.2 How would DHS respond to a release of mosquitoes and other vectors? The EIS needs to show a detailed plan.

Sincerely,
 Janet Gray

PS I suffered from Lymes Disease for years. Rumor has it that it began at a facility such as this. I suffered ten years!

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 21.2

DHS notes the commentor's concerns regarding an accidental release of a vector, such as a mosquito, from the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections, vector escape and accidental releases. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the South Milledge Avenue Site is specifically addressed in Section 3.8.9 and Section 3.10.9.1 as well as in Section 3.14.4.1 (Health and Safety). Section 3.10.9.1 discusses the relative suitability of the regional climate of the South Milledge Avenue Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.3.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Greene, Jean

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WD0720

From: [REDACTED]
Sent: Monday, August 25, 2008 12:47 PM
To: NBAFProgramManager
Subject: Athens

1|25.2 | Please don't move the lab to Athens. Other than the college and the Chamber of Commerce, we don't want it or need it. The old lab can be torn down and a new one built on the same secure site.

2|24.1 | I just don't get why there needs to be a new site and I don't support the move. It sounds like the techs want to move to a fun warm place. Go somewhere else!!

Jean Greene

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

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 24.1

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.

Greer, Tiffany

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FD0064

Tiffany Greer

August 25, 2008

US Dept of Homeland Security
Science & Technology Directorate
Mr. James V. Johnson
Mail Stop #2100
245 Murray Lane, SW
Building 410
Washington, DC 20528

Sent via Fax # 1-866-508-6223

Dear Sir:

1) 24.5 I am writing to you in regards to the NBAF proposed site at Flora, MS. Mississippi will truly embrace the opportunity of new jobs. We have a great quality of life and people will want to move here to work in collaboration with the NBAF.

Sincerely,


Tiffany Greer

Comment No: 1

Issue Code: 24.5

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

Griffith, Eric

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WD0855

From: [REDACTED] Eric Griffith [REDACTED]
Sent: Monday, August 25, 2008 9:23 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

NBAF Program Manager,

- 1| 15.2 I am opposed to having NBAF in Athens, Georgia. I wish to be clear on this point - I am not merely somewhat opposed, but rather I am vehemently and adamantly opposed to NBAF.
- 2| 15.2, 19.2 I attended the final DEIS meeting in Athens recently, and was unconvicted by the DHS presentation. NBAF presents a multitude of risks for our quality of life and safety, and your reassurances are not credible. Although some UGA and local government officials are pursuing NBAF for the sake of prestige and money to the detriment of our community, you should know that a significant number of Athens residents strongly oppose NBAF.
- Here are just a few reasons why I oppose NBAF being located in Athens:
- 3| 19.2 1) The potential release of a dangerous pathogen -- whether through technological failure, human error, malicious action by a rogue employee, or terrorist incident -- presents a grave danger to the health and safety of the Athens community.
- 4| 13.2 2) The warm climate and abundant insects and wildlife in Athens pose a significant opportunity for the spread of diseases to be studied at NBAF, and for the establishment of a permanent reservoir of disease in our local ecosystem.
- 5| 2.2 3) The Department of Homeland Security does not have evidence that foot-and-mouth disease research can be conducted on the U.S. mainland without significant risk of an animal epidemic, according to the Government Accountability Office.
- 6| 13.2, 10.2 4) NBAF would forever destroy the pristine character of the land surrounding the State Botanical Garden of Georgia. The large size of the facility, light pollution, noise pollution, and other factors make NBAF entirely inappropriate for this environmentally sensitive location. I have many friends who take much pleasure in kayaking and canoeing along this stretch of the Oconee River, an area whose beauty would be irrevocably marred by NBAF.
- 7| 7.2
- 8| 12.2 5) Athens is in the grip of a long-term drought. State Climatologist David Stooksbury wrote on July 24, 2008:
 "Exceptional drought has returned to northeast Georgia, and continuing dry weather has spread drought conditions to southeast Georgia... Exceptional drought conditions now are occurring north and east of a line from Wilkes to Oglethorpe to Clarke to Jackson to Hall to Lumpkin to Union counties, inclusive. This includes 16 counties in northeast Georgia. Exceptional is the worse drought category. During exceptional drought, many of the drought indicators are at levels seen only once in 50 to 100 years."
- 9| 12.2 With NBAF projected to consume up to 275,000 gallons of water per day, it would be stupendously misguided to place NBAF in Athens. We are already struggling to conserve our limited water supply and cannot support NBAF's water demands.
- 10| 18.2 6) Disposal of enormous numbers of infected animal carcasses, whether by incinerating them or dissolving them in an acid bath, is a horrifying prospect.

Comment No: 1 Issue Code: 5.2

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

Comment No: 2 Issue Code: 15.2

DHS notes the commentor's concern. Adverse effects to quality of life resources would not be expected with any of the site alternatives and are discussed in Section 3.10.

Comment No: 3 Issue Code: 19.2

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, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 4 Issue Code: 13.2

DHS notes the commentor's concerns regarding an accidental release of a vector, such as a mosquito, from the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. The NBAF would provide state-of-the-art operating procedures and biocontainment features to

minimize the potential for outside insect vector penetration, laboratory-acquired infections, vector escape and accidental releases. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the South Milledge Avenue Site is specifically addressed in Section 3.8.9 and Section 3.10.9.1 as well as in Section 3.14.4.1 (Health and Safety). Section 3.10.9.1 discusses the relative suitability of the regional climate of the South Milledge Avenue Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.3.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Comment No: 5 Issue Code: 2.0

DHS notes the commentor's opposition to the five mainland site alternatives and reference to the U.S. Government Accountability Office report (May 2008) as justification. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable it to be safely operated on the mainland. 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.

Comment No: 6 Issue Code: 10.2

DHS notes the commentor's noise concerns. Section 3.5.3 of the NBAF EIS describes the potential construction and operational consequences of NBAF on the acoustic environment at the South Milledge Avenue Site. Minor noise impacts would result from an increase in traffic and operation of the facility's filtration, heating, and cooling systems. Section 3.5.5.3 describes noise-attenuating

design features that would minimize noise emissions. NBAF's routine operations are not anticipated to have significant noise impacts; however, in the event of a power outage, operation of back-up generators could have short-term noise effects.

Comment No: 7 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. DHS notes the commentor's concern regarding potential noise affects. As described in Sections 3.5.3.2 and 3.5.3.3 of the NBAF EIS, most audible operational noises would emanate from traffic and the facility's heating, cooling, and filtration systems; and the four year construction period would result in temporary noise consequences.

Comment No: 8 Issue Code: 12.2

DHS notes the commentor's drought 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 the amount consumed by 228 residential homes.

Comment No: 9 Issue Code: 12.2

Please refer to the reponse in Comment No. 8.

Comment No: 10 Issue Code: 18.2

DHS notes the commentor's concern about animal carcass disposal. NBAF EIS Section 3.13 explains that a number of different technologies (compared in Table 3.13.2.2-4) including incineration, alkaline hydrolysis, and rendering are being considered for disposal of euthanized animal carcasses. Before infected animals would be destroyed using any of the technologies being considered, they would be euthanized in accordance with practices recommended by the NBAF's Institutional Animal Care and Use Committee and regulations promulgated under the Animal Welfare Act.

Griffith, Eric

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WD0855

11| 5.2 | I could go on to cite numerous other objections, but you get my point. The citizens of Athens do not want NBAF
12| 5.1 | here, despite the overtures made by UGA and local government officials. Please build a new facility for NBAF in
the safest location, which is Plum Island.

Sincerely,

Eric Griffith
[REDACTED]

Comment No: 11 Issue Code: 5.2

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

Comment No: 12 Issue Code: 5.1

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

Griffith, M. Smith

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WD0669

From: [REDACTED]
Sent: Sunday, August 24, 2008 11:49 AM
To: NBAFProgramManager
Subject: M.Smith Griffith's letter to Secretary Chertoff dated March 25, 2008--Please add this to the record as an NBAF DEIS comment from Athens, GA.

[REDACTED]
 March 25, 2008

Secretary Michael Chertoff
 Department of Homeland Security
 Washington, D.C. 20528

Dear Secretary Chertoff,

I am engaged in a spirited and broad-based community effort to protect Athens from what we believe to be poor judgment and misplaced priorities on the part of the administration of the University of Georgia and our elected representatives regarding the Department of Homeland Security's proposed National Bio and Agro Defense Facility.

- 1) 13.2 | The University has offered up to DHS 66 acres of beautiful land along South Milledge Avenue, adjacent to the State Botanical Garden, overlooking the Middle Oconee River and close to our neighborhoods, schools and places of worship, to site this giant, environmentally invasive, degrading and potentially dangerous proposition. Why NBAF should be located where proposed in the middle of our community has not been answered by UGA or DHS other than "for convenience". Fortunately, an environmental impact statement is being prepared which, if competently and honestly done, should underscore how wrong this location is for such an undertaking.
- 2) 6.2 |
- 3) 4.2 |
- 4) 25.2 | Enclosed are copies of two letters I have written, one to our Mayor and one to the President of our Chamber of Commerce, in opposition to this project. The letters provide a broader introduction to me as well as a more detailed explanation of the concerns of the Athens citizenry, both as to the project and the process by which Athens became "short-listed" by DHS as a potential NBAF location.

Please take our concerns to heart. The people of Athens do NOT accept NBAF, and we are prepared to fight by all legal means its imposition on our community.

Sincerely,

Comment No: 1 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the Botanical Garden and the Middle Oconee River. 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. 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 South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with Whitehall Forest. 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. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9 of the NBAF EIS. Although the NBAF EIS acknowledges the potential for significant wildlife impacts in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 2 Issue Code: 6.2

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

Comment No: 3 Issue Code: 4.2

DHS notes the commentor's statement regarding the preparation of 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 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.

Comment No: 4

Issue Code: 25.2

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

Griffith, M. Smith

Page 2 of 2

M. Smith Griffith

cc: James Johnson, NBAF Program Manager

Griffith, M. Smith

Page 1 of 4

MD0079

February 11, 2008

Re: Bio-Terror Lab in Athens?

Dear Mayor Davison:

11/27.0

I like to think that I stay fairly well informed with what is happening in Athens, but I was taken aback when I learned that Athens was being considered by the Department of Homeland Security as a site for the National Bio and Agro Defense Facility (NBAF), a Bio-Safety Level 4 installation, the most dangerous of bio-labs, that will house some of the planet's deadliest, most infectious and incurable pathogens. And it would be bigger than two and a half Super Wal-marts, taking over 66 acres of that beautiful property adjacent to the Georgia Botanical Garden overlooking the Oconee River! If anything of this magnitude and consequence to our fair city had been reported in the press, I had missed it. I was aware of and following with interest and enthusiasm the effort to attract a branch of the Georgia Medical College to Athens. Also, of course I was acutely aware of the severe drought we in Athens and northeast Georgia were suffering and are continuing to experience.

I definitely needed to know more about NBAF. When I heard that Edward Hammond of the Sunshine Project had accepted an invitation to come to Athens and give a talk about the proliferation of these high-risk bio-containment facilities like NBAF in the U.S., I decided he could tell us more than anyone in the Athens media or government had done. His credentials were impressive: he had monitored accidents related to, and potential abuses by governments and universities of these BSL 3 and 4 laboratories in the U.S. and worldwide for years, usually having to resort to the Freedom of

Comment No: 1

Issue Code: 27.0

DHS notes the information submitted by the commentor.

Griffith, M. Smith

Page 2 of 4

MD0079

Information Act in the U.S. to obtain any the information. He had testified before the House of Representatives Committee on Oversight and Investigations (an investigation at which the Department of Homeland Security was asked to testify, and its officials failed to appear). Without hesitation, I marked my calendar for January 22. None of us knew what to expect for this community meeting, and I and many friends and acquaintances came away with even more questions and concerns about NBAF. Those questions and concerns are still running rampant throughout Athens. The whole concept of inviting the world's largest Bio-Terror defense facility into our community, so near to our University students classrooms and dormitories, even nearer to some of our schools, churches and neighborhoods, to be developed and managed by the Department of Homeland Security, with all of its publicized problems and failings, gave us all great pause. With so many similar laboratories currently being developed or operating in the U. S., why do we need another one? In particular, why do we need one in Athens? Why did Senator Hillary Clinton state that she did not want Plum Island to be upgraded to a BSL 4 facility because it was "too close to New York City"? Are the lives of us living in Athens less valuable than the lives of the people of New York?

1 cont. | 27.0

All these questions were being asked at my gym last week. Someone questioned why the whole NBAF proposal was done in such a quiet fashion by UGA and the City County Commission. Why was the community not included in the process? NBAF is not just another business being courted to come to town. NBAF represents a significant threat to our environment, and a serious potential threat to our safety, wellbeing and quality of life. It could change the entire character of Athens as a creative, progressive and peaceful community. *Are potential bio-terror bucks worth those risks?* I think not, and I am greatly concerned that our city-county government could think otherwise. As was said in Don Nelson's recent column in the *Banner-Herald*, we only need to look at Three Mile Island, Chernobyl, and the recent outbreaks of foot and mouth disease in England to know that "safe" high risk undertakings can go badly wrong and should not be located close to schools, churches and neighborhoods. It doesn't appear that anyone has any real answers to why NBAF should be located where proposed. Is it for the convenience of researchers to be so near UGA facilities and the amenities of Athens? That does not seem a fair tradeoff when it comes to the environmental degradation and other risks NBAF represents. Will DHS representatives answer these questions at the meeting in Athens on February

Griffith, M. Smith

Page 3 of 4

MD0079

19? *Why weren't these questions posed and answered before you and the Consortium invited DHS to build NBAF here?*

I love Athens. I have lived here in the same house we bought 46 years ago. I have been a good citizen. I served on many boards over the years. I was a founding member of the Advisory Board of Trustees of Athens Academy. I served on the Salvation Army board for five years and the Advisory Board for the Boy's Club. I am a Charter Member of the UGA President's Club. In 1975 I received the Woman of the Year Golden Award for Volunteer Service. I have served on the boards of the Clarke County Community Chest and the United Way and as Co-President of the Athens Concert Association. In 1988, President Knapp appointed me to the Advisory Board of the Georgia Museum of Art, and I remain a board member today. The Museum has been my cause to champion for many years. I did not attend UGA, but my daughter and son are Georgia graduates, and they and I have been—and we continue to be—among the largest financial donors to the University. In 1989 I received the ARCH Award, given by the UGA Alumni Association, and in 2007 I was honored to receive the Blue Key Service Award from the University.

In 1998 I decided it was my time to visit more of the world. So far I have been on three around-the-world cruises. With ample time ashore, I visited many cities, towns, and villages, experiencing the people and their lifestyles from Moscow to Viet Nam, from Easter Island to Tahiti to Tokyo, from London to South Africa, South America and Antarctica, from the Taj Mahal to the Great Wall of China and most places in between. At each stop I always talked about my Athens and had pictures to show. I remember the first time we stopped at Pitcairn Island in the South Pacific. Most of the people, I thought, looked just like Fletcher Christian of "Mutiny on the Bounty" fame. They all spoke beautiful English, and one proudly showed me a clipping he kept in a notebook. It was a story about Herschel Walker, apparently written by a football enthusiast from a ship that had made an earlier visit.

The point of this travel history is this: of all the places I have visited and the sights I have seen in just about every corner of this earth, I have not found a place in which I would rather live than Athens, Georgia. I know our town has economic issues you and the Commissioners are seeking to address and solve, and I hope in time those issues will be solved in creative and constructive ways that will enhance our fair city's reputation as the "best

1 cont. | 27.0

Griffith, M. Smith

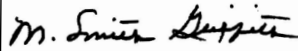
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MD0079

place in the world to live". But I would hate to think that the legacy that we would leave our children, grandchildren and future residents is one of fear and even embarrassment that we were known as the "Home of the World's Largest, Deadliest Bio-Terror Lab". That is not the Athens I know and love, and I believe that is not the Athens most of us want our wonderful city to become.

1 cont. | 27.0

Sincerely,

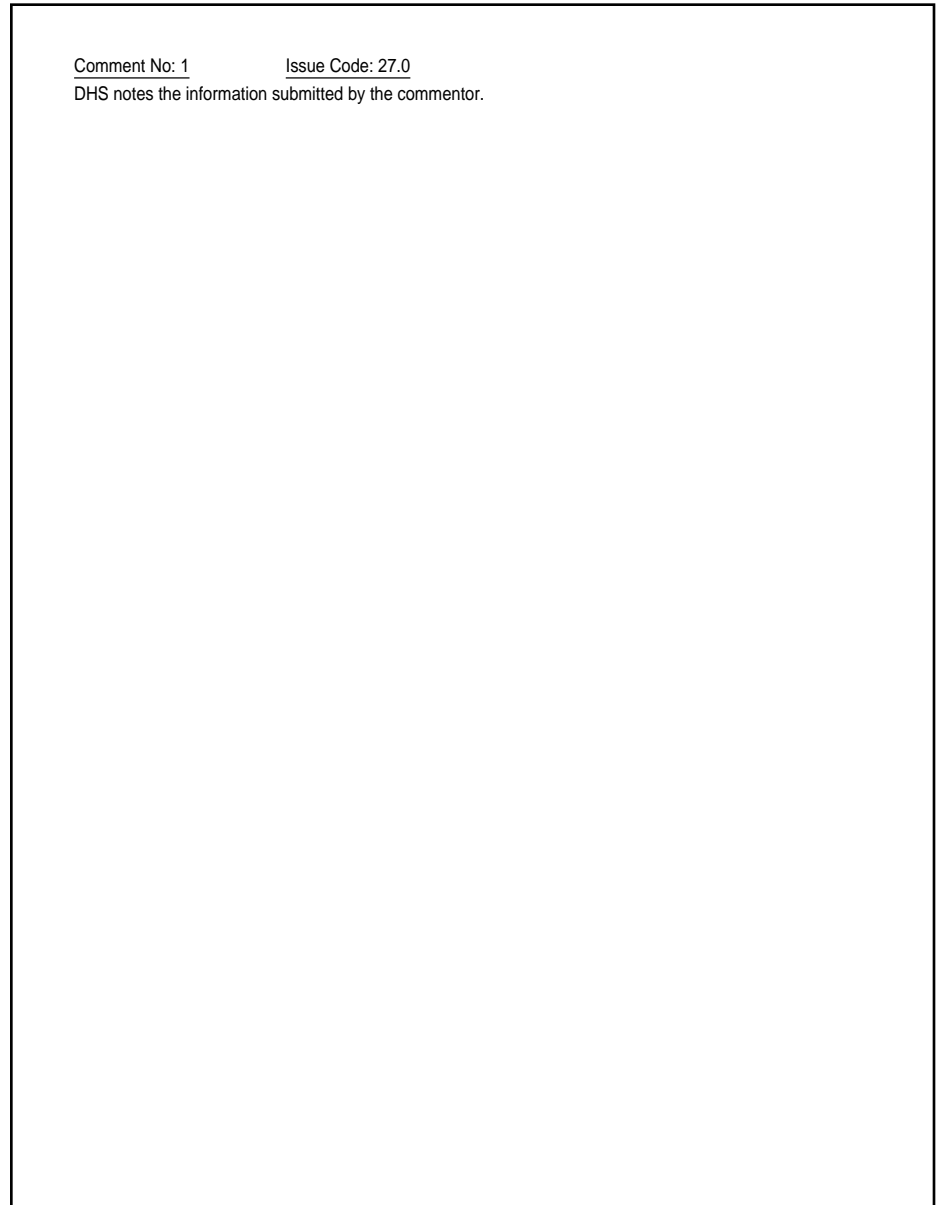
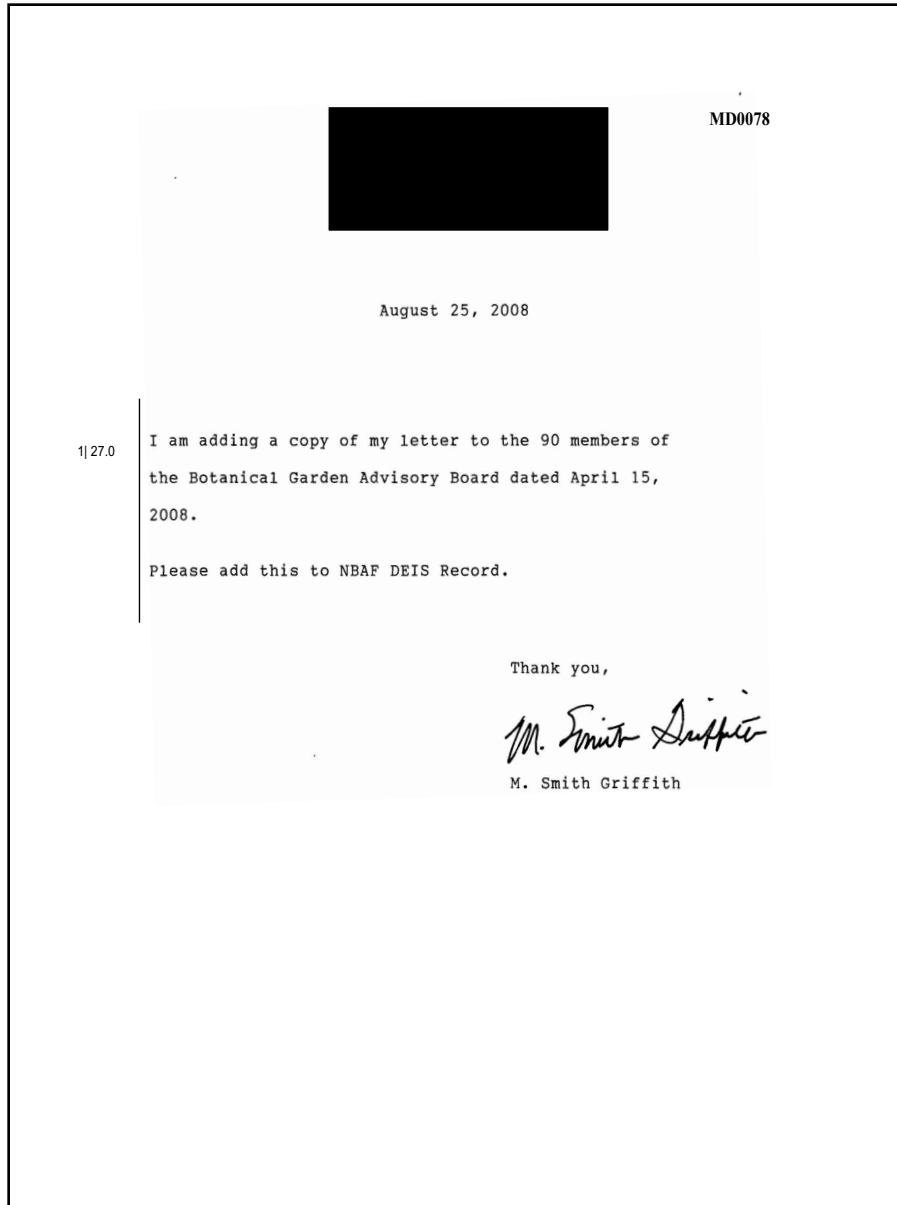


M. Smith Griffith

cc: Athens/Clarke County Commissioners

Griffith, M. Smith

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Griffith, M. Smith

Page 2 of 4

MD0078

April 15, 2008

Dr. A. Jefferson Lewis III
The State Botanical Garden of Georgia
2450 South Milledge Avenue
Athens, Georgia 30605

Dear Dr. Lewis,

Our beloved State Botanical Garden in Athens is being threatened by the federal Department of Homeland Security's effort to secure a site for its proposed 520,000 square foot bio-terror defense laboratory, the National Bio and Agro- Defense Facility (NBAF). Sadly and ironically, our equally beloved University of Georgia, under the auspices of which the Botanical Garden exists, is the moving force behind this potentially tragic overreach of governmental and institutional ambition.

UGA has offered to give DHS 66 acres of beautiful land *adjacent to the Garden* and overlooking the Oconee River for this giant undertaking. The facility, expected to be the world's largest Level 4 bio-terrorism research laboratory, will be the first of its scale and purpose to be designed, developed and managed by this troubled federal agency.

NBAF's mission would be to develop counter measures and cures in the event of a terrorist-inspired or naturally occurring germ or viral attack on our livestock population. To accomplish its mission, NBAF would study the effects of deadly diseases on herds of large animals. Some of the diseases to be studied have no cure or vaccine and are transmittable to humans. The impact on the environment of the Garden (and its newly designated and soon to be dedicated Important Bird Area in conjunction with Whitehall Forest), the surrounding neighborhoods, our natural resources, infrastructure and quality-of-life will be staggering. An accidental or intentional release of deadly pathogen from the facility, however remote, could be catastrophic to our community.

No matter what may be the stated justifications (terrorism defense, protecting livestock from foreign disease, federal grants to UGA, economic impact to Athens) for this huge, invasive and potentially deadly federal undertaking, there is no justifiable reason, we believe, to put our community's environment, health and public safety at risk by placing the facility in this cherished location adjacent to the Garden, so close to our homes, schools and places of worship and recreation.

1 cont. | 27.0

Griffith, M. Smith

Page 3 of 4

MD0078

I hope you, as a member of the Garden's Board of Advisors, will inquire into the concerns of so many Athenians, Garden and UGA supporters like me and agree that NBAF should not be built where proposed.

1 cont. | 27.0

Sincerely,



M. Smith Griffith

P.S. I have enclosed copies of additional correspondence and information to give amplification and perspective to what I state in my letter.

Griffith, M. Smith

Page 4 of 4

1 cont. | 27.0

August 19, 2008

Board of Advisors
The State Botanical Garden of Georgia
2450 South Milledge Avenue
Athens, Georgia 30605

Dear Member,

Time is running out. August 25 is the last date the Department of Homeland Security will record citizens' opposition to the huge, invasive and environmentally degrading National Bio and Agro Defense facility. DHS is considering building NBAF adjacent to our State Botanical Garden on South Milledge Ave, where it would be the largest (as big as two and a half Super Wal-Marts) high consequence bio-containment research facility in the world. In it, studies would be conducted which include large-scale bio-terrorism defense experiments on herds of large animals, utilizing many of the world's most contagious and deadly foreign animal and zoonotic diseases, some of which are fatal to humans.

DHS has invited input from the community and other interested parties regarding the impact of the proposed NBAF on the environment. Your comments and concerns will be addressed in a final Environmental Impact Statement to be published in December 2008. The final EIS will also reveal DHS's "preferred site selection".

You may email DHS at nba1programmanager@dhs.gov; you can call and leave a voice message at 1-866 501 6223 or fax to 1-866 508 6223. Written letters may also be submitted addressed to: James V. Johnson, US Department of Homeland Security, Science and Technology Directorate, Mail Stop 2100, 245 Murray Lane, SW, Building 410, Washington, DC 20528.

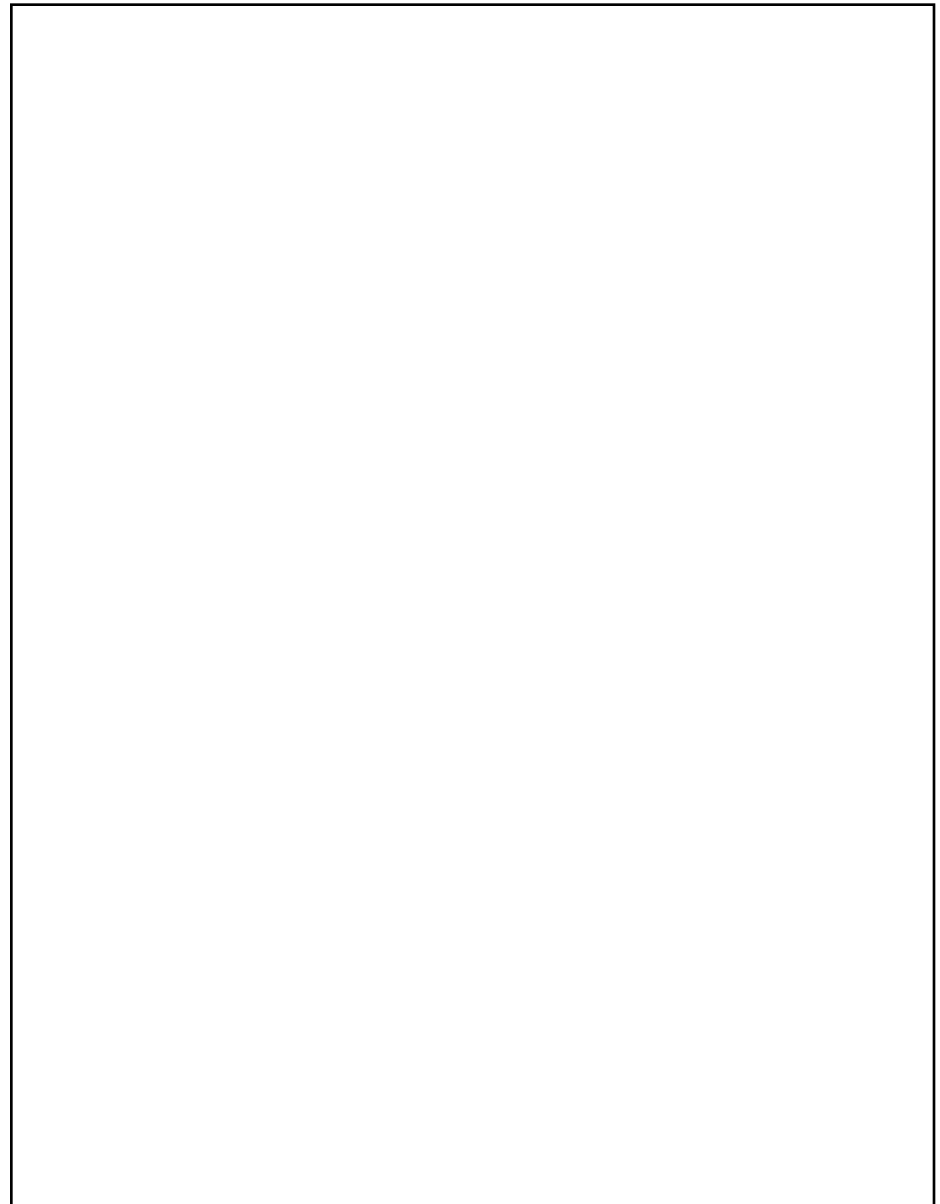
I hope you, as a Member of the Board of Advisors of the Garden, will join with so many Athenians, Garden and UGA supporters like me to let DHS know that NBAF should not be built in Athens next door to our State Botanical Garden.

Thank you,

M. Smith Griffith

M. Smith Griffith

16: 90 Board Member MD0078



Griffith, M. Smith

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MD0077

1|27.0

PLEASE ADD THE ENCLOSED 20 LETTERS TO
NBAF DEIS RECORD.

THE ADDITIONAL IS AN INTRODUCTION TO
ME.

THANKS,



SMITTY GRIFFITH

Comment No: 1

Issue Code: 27.0

DHS notes the information submitted by the commentor. These letters have been added to the Administrative Record.

Griffith, Jr., Louis

Page 1 of 3

MD0066

25 August, 2008

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

Dear Mr. Johnson;

1| 25.2 I appreciate the opportunity to register my opposition to the proposed siting of the National Bio- and Agro- Defense Facility (NBAF) on South Milledge Ave. Athens, Georgia.

First and foremost, NBAF will assume responsibility for the study of Foot and Mouth Disease (FMD). There has not been an outbreak of this disease on the U.S. Mainland since 1929. FMD is "the most highly infectious animal disease that is known with nearly 100% of the exposed animals infected". This disease is easily transmissible through contaminated food and water, farm equipment and vehicles, and through aerosolized dispersal. Indeed, even scientists and laboratory workers can become uninfected hosts, carrying the virus in their nasal and respiratory passages. Since FMD affects cloven hoofed animals, infection is not limited to livestock, but is also transmissible to and from wildlife as well.

2| 21.0 Arguably, the NBAF will incorporate state of the art bio-containment systems, robust standard operating procedures, and be staffed by well trained personnel. Even so, a zero risk of release can not be guaranteed, even in the best of circumstances. This risk is explored in testimony by the U.S. Government Accountability Office delivered in May 2008, which concludes that the Department of Homeland Security (DHS) "lacks evidence to conclude that FMD research can be done safely on the U.S. Mainland". This testimony was based on research of laboratory accidents worldwide, interviews with experts in the field, including DHS and USDA scientists, as well as others involved with similar labs worldwide. Most agreed that while technology exists which would make safe study feasible, such safety is not actually possible, given the possibility of human error. It further concluded that even the most well built Bio-containment can not guarantee a "zero risk of release".

3| 5.0 These experts continue to appreciate and advocate a combination of high tech Bio-containment, coupled with remoteness of the lab from susceptible species, and permanent water barriers to lessen the likelihood of a devastating outbreak in the event of release.

Comment No: 1 Issue Code: 25.2

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

Comment No: 2 Issue Code: 21.0

DHS notes the commentor's opposition to the five mainland site alternatives and reference to the U.S. Government Accountability Office report (May 2008) as justification. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable it to be safely operated on the mainland. 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.

Comment No: 3 Issue Code: 5.0

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

Griffith, Jr., Louis

Page 2 of 3

MD0066

Siting NBAF in Athens, Georgia would, at best, succeed in only one of these three criteria.

The Draft Environmental Impact Statement (DEIS) identifies all sites except the Plum Island Animal Disease Center (PIADC) with an overall risk rank of MODERATE, due to the potential EASY spread of the disease through livestock and wildlife. The DEIS goes on to describe PIADC as low risk due to the low likelihood of any disease getting off of the island. In fact FMD did escape containment at PIADC in 1978 resulting in the infection and subsequent destruction of "clean animals". Only because of the island location was the U.S. Mainland able to maintain a FMD disease free status, and thereby avoid significant economic impact to our meat exporting industry.

4| 1.0 FMD should not be studied anywhere on the U.S. Mainland, and I would call upon the
3 cont.| 5.0 Secretary of Homeland Security to exercise his discretion in NOT approving its research here, and maintain this disease at an arms length to the mainland.

5| 8.2 Specifically to the Athens site, the DEIS identifies several deficiencies in infrastructure, which are critical to the safe operation of the NBAF, water being chief among them. Athens and the surrounding area continue in the grip of a near devastating drought. This situation has resulted in many hardships, including the closure of long-standing businesses in the community that depend on an ample supply of water. These hardships have not stopped there. Families throughout Athens Clarke and surrounding areas have been forced to dig wells to supplement municipal water, while others continue to collect "grey" water so that food gardens can be maintained. Still others have opted not to grow their own food crops, instead relying on super markets and groceries to supply fresh vegetables, the safety of which has been called into question lately with a rash of contaminated foods being distributed throughout the country

7| 8.2 The operation of the NBAF calls for huge volumes of water, which current infrastructure, as well as proposed upgrades will be unable to supply. The DEIS calls for the expansion of two water lines over several miles to adequately meet the "redundancy specifications and the peak flow requirements" of the NBAF. This in itself will place the burden of water supply squarely on the shoulders of the taxpayers of Athens-Clarke County.

8| 15.2 Emergency response is another infrastructure component that is lacking at present. While the DEIS examined the capabilities of local emergency responders and their ability to respond to "off normal" events, the study did not take into account the fact that an incident would be a regional one, and would therefore require the involvement of other fire, police, and emergency medical agencies from Counties other than Athens-Clarke.

The proposed site sits near the border of Athens-Clarke and Oconee Counties, and the DEIS failed to properly evaluate the capabilities of the surrounding areas. Indeed, an "off normal" event at the NBAF would be a regional incident that would require a full response by many agencies, local, state, and federal. The burden of the initial response and mitigation would however, fall to the local agencies. Athens-Clarke maintains a

Comment No: 4 Issue Code: 1.0

DHS notes the commentor's position and concern for locating NBAF on a mainland site. 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 on the mainland.

Comment No: 5 Issue Code: 8.2

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

Comment No: 6 Issue Code: 12.2

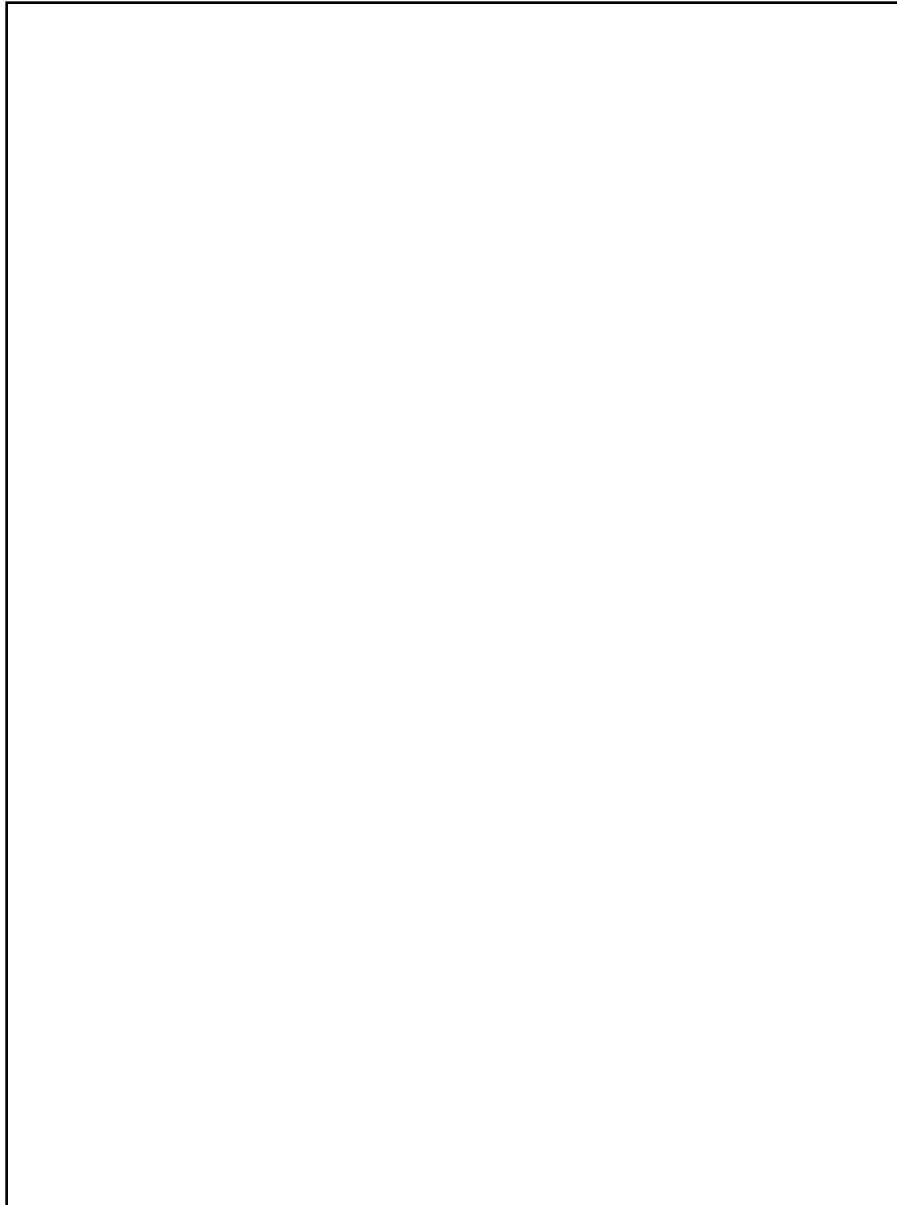
DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water an amount that is approximately 0.76% of 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 the amount consumed by 228 residential homes. Sections 3.7.3.2 and 3.7.3.3 describe the potential construction and operational consequences on local water resources and how they would be managed. Section 3.13 describes the NBAF's liquid and solid waste management approaches for preventing the release of pollutants and pathogens.

Comment No: 7 Issue Code: 8.2

DHS notes the commentor's concern regarding the state and local government's cost associated with constructing the NBAF. Funding for the design, construction, and operations for the NBAF will come from the Federal government. Proposals for offsets to the site infrastructure (part of the construction costs) were requested by the Federal government. The decision as to what to offer (land donation, funding, other assets) is solely as the discretion of the consortium, state and local officials as part of the consortium bid site package. The amount of funding and how the funding is paid for (bonds, taxes, etc) is determined by the state and local government officials and not the decision of the Federal government.

Comment No: 8 Issue Code: 15.2

DHS notes the commentor's concern. If a decision to construct NBAF is made in the Record of Decision, 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. DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Emergency management plans will also include training for local law enforcement, health care, and fire and rescue personnel.

Griffith, Jr., Louis

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MD0066

8 cont. | 15.2

large paid Fire Department, however most surrounding counties are protected by primarily volunteer resources. While these groups are in many cases as well trained, dedicated, and professional as any paid personnel, they are volunteers, and continue to rely on barbeques and raffles to raise monies to purchase much needed equipment. In much of the area around the proposed NBAF site, it would in the first few hours, be the actions of these volunteers, and their actions alone, which would make the difference between a limited exposure and the possibility of the establishment of a reservoir of contamination, in the event of a release.

Another infrastructure component, which the DEIS did not address at all is the provision of pre-hospital Emergency Medical Service (EMS). This component is important not only to possible "off normal" operations, but also day-to-day operations, as well as quality of life issues for employees and their families living in the area. Historically EMS has been provided to Athens-Clarke and Oconee Counties by our two local hospitals, who have done so with distinction. However, both hospitals have made public their inability to continue this service past the year 2008, without some meaningful assistance from local government. So far, the Athens-Clarke Government has been clear that it has no intention of becoming involved in this much needed component of Public Safety. Many have been left to wonder what if any plans for EMS have been made going forward.

9 | 5.2

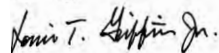
Community Acceptance is another pillar on which the NBAF siting decision will be made, and it has not been achieved with regard to the Athens site. While much has been said in support of siting NBAF in Athens, and local media outlets would have one believe that the community is in full support, this is not the case. Elected officials have dismissed, and at times vilified those who have spoken out against NBAF. Their rhetoric, while supporting their point of view, has done much to silence a public dialogue about this facility.

4 cont. | 1.0
3 cont. | 5.0

1 cont. | 25.2

Many respect and appreciate the service that you and others from DHS and USDA have given this Nation, and while we agree that the mission of NBAF should be carried out to insure our continued safety, we believe that the foremost rationale for the siting of the NBAF should be safety. With that in mind, siting NBAF in Athens, Ga. or anywhere on the U.S. Mainland is not consistent with the current body of data regarding the safety of these types of labs, as evidenced in the DEIS as well as the GAO report of May 2008, among others.

Sincerely,




Comment No: 9

Issue Code: 5.2

DHS notes the commentor's statement.

Griswold, VMD, David

Page 1 of 1

WD0064

From: [REDACTED]
Sent: Friday, July 11, 2008 10:46 AM
To: NBAFProgramManager
Subject: NBAF Sites Comment

1| 24.1 | All other considerations aside, Plum Island seems to be the only site that provides virtually complete
2| 21.1 | assurance that in the event of an agent being accidentally released on site, no domestic animal exposure
could occur.

David R. Griswold, VMD



Comment No: 1 Issue Code: 24.1
DHS notes the commentor's support for the Plum Island Site Alternative.

Comment No: 2 Issue Code: 21.1
DHS notes the commentor's opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though the Plum Island Site 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.

Gross, Ph.D., Amy

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WD0315

From: Amy Gross [REDACTED]
Sent: Friday, August 15, 2008 2:38 PM
To: NBAFProgramManager
Subject: Advocating the Placement of the NBAF in Manhattan, KS

1|24.4 | As a resident of [REDACTED] Kansas for eleven years (seventeen if you include graduate school at K-State), I encourage you to locate the NBAF here.

I understand the importance of basic research in the natural and social sciences, and I have confidence in the safety protocols and technology of the proposed facility and am certain that the Manhattan's Biosecurity Research Institute, that would be adjacent to the NBAF if it is placed in our community, would be a secure location.

It seems appropriate that the Manhattan's location would ensure that research professionals at the NBAF will have numerous opportunities for collaborative research and partnerships with animal health experts in the region.

I realize that placing the NBAF has been a very deliberate process, and I am sure that any of the finalist sites would make a good home for the facility. However, the level of talent, infrastructure, community support, and opportunity for collaboration make Manhattan the top choice. We are a growing, strong community that would welcome the addition of NBAF, its employees, and their families.

Thank you for your consideration.

Amy Gross, Ph.D.
[REDACTED]

Comment No: 1


Issue Code: 24.4

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

Haas, Debra

Page 1 of 1

GAD009



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: DEBRA L. HAAS

Title: [REDACTED]

Organization: [REDACTED]

Address: [REDACTED]

City: [REDACTED] State: GA Zip Code: [REDACTED]

Comments: I am a researcher in [REDACTED] GA
at the College of Vet. Med at [REDACTED] I am a
supporter of NBAF and feel strongly that Athens
would make an ideal location for this new facility
We have a great & diversity group of researchers
already working with an BSL 3 facility here.
The CDC, USDA, & nearby & offer
unparalleled support locally. We have
an unique opportunity to create a facility
that will draw world class scientist to
Athens and focus on finding cures to devastating
diseases. I would urge those who are charge with
making the decision to strongly consider Athens

(Continued on back for your convenience)

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: 8.2
 DHS notes the information provided by the commentor.

Haas, Marigene Banks

Page 1 of 1

CD0405

From: [REDACTED] Marigene Banks Haas [REDACTED]
Sent: Tuesday, August 19, 2008 3:06 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 21.2 | We are strongly opposed to having NBAF in our community of Athens, GA. The DEIS discloses an "insectary" where disease-spreading mosquitoes and other "vectors" will be bred. It also discloses that any release of pathogen, because of our warm, humid climate, could cause the disease to become permanently established in our community.

How would DHS respond to a release of mosquitoes and other vectors? The EIS needs to show a detailed plan.

2| 25.2 | I am completely opposed to the building of the facility in Athens, Georgia!!
 Sincerely, Marigene Banks Haas

Comment No: 1 Issue Code: 21.2

DHS notes the commentor's concerns regarding an accidental release of a vector, such as a mosquito, from the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections, vector escape and accidental releases. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the South Milledge Avenue Site is specifically addressed in Section 3.8.9 and Section 3.10.9.1 as well as in Section 3.14.4.1 (Health and Safety). Section 3.10.9.1 discusses the relative suitability of the regional climate of the South Milledge Avenue Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.3.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Comment No: 2 Issue Code: 25.2

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

Haigh, Rosemary

Page 1 of 1

PD0017

July 17, 2008

Hello,

My name is Rosemary Haigh, and I am a resident of [REDACTED], New York.

1| 25.1 | I am calling to express my disapproval of Plum Island being considered as a viable location for the BSL-4 lab.

2| 15.1 | My concerns are as follows: (1) the proximity of the lab to New York City, (2) the large population of Long Island and New York metropolitan city....metropolitan area that could potentially be effected by a mishap at this lab, and (3) there is no way to effectively evacuate Long Island's population if there is a mishap.

3| 21.1 |

4| 19.1 |

Thank you very much. I hope that my comments will be taken with serious consideration.

Good bye.

Comment No: 1 Issue Code: 25.1

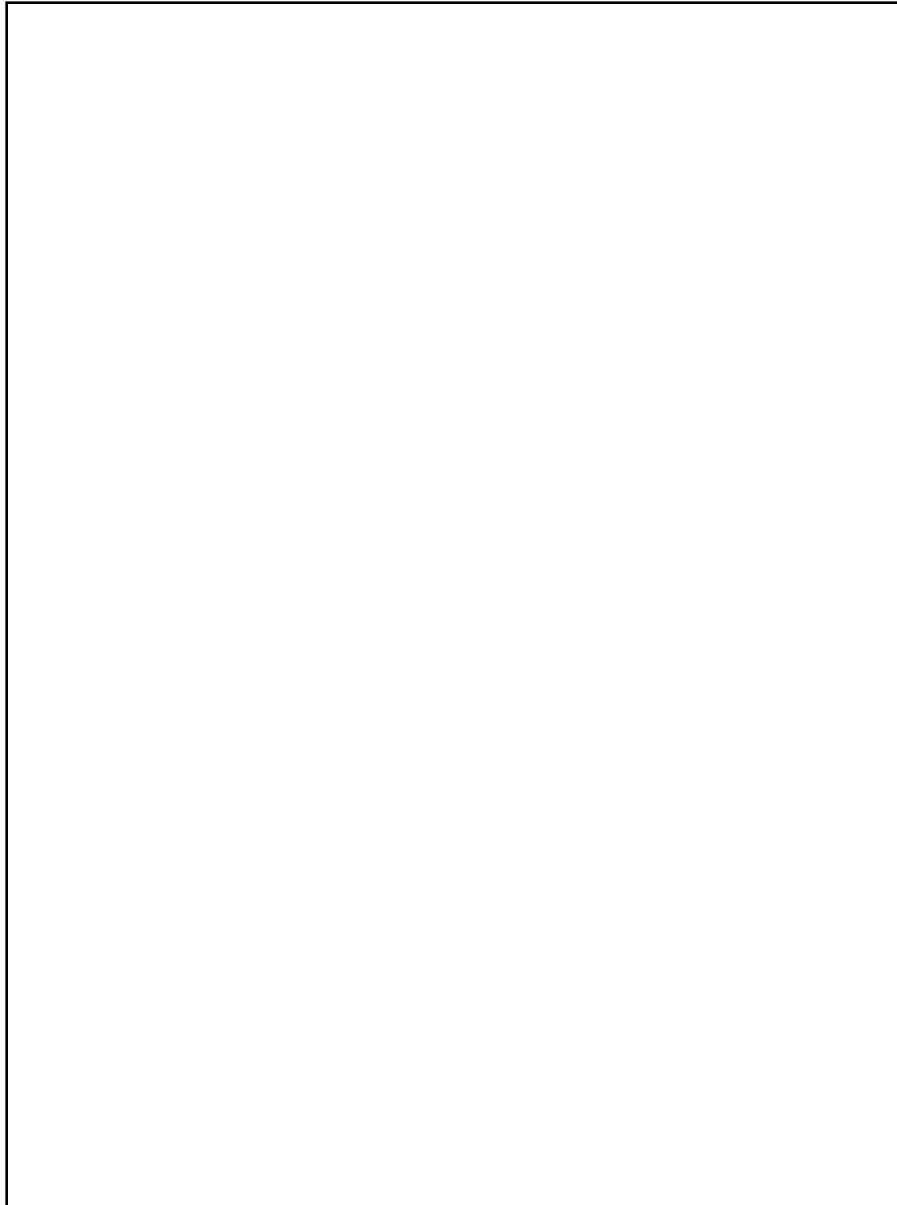
DHS notes the commentor's opposition to the Plum Island Site Alternative.

Comment No: 2 Issue Code: 15.1

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

Comment No: 3 Issue Code: 21.1

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. An evaluation of the existing road conditions and potential effects to traffic and transportation from the Plum Island Site Alternative is provided in Section 3.11.6



of the NBAF EIS. An emergency response plan, which would include area evacuation plans, would be developed if one of the action alternatives is selected and prior to commencement of NBAF operations.

Comment No: 4 Issue Code: 19.1

DHS notes the commentor's concern. A site-specific emergency response plan will be developed and coordinated with the local Emergency Management Plan regarding emergency response measures for all potential emergency events including accidents at the NBAF. The need for an evacuation under an accident conditions is considered to be a very low probability event. Evacuation would not be needed in case of an accidental release of FMD because FMD is not a public health threat; humans as well as cats, dogs, birds and other non-cloven hoofed household pets are not affected by FMD.

Halbrook, Jerry

Page 1 of 1

PD0315

August 25, 2008

My name is Jerry Halbrook. [REDACTED]

My comments are: I am very much for having the NBAF located in [REDACTED] Mississippi. Let me interject here that I am a citizen of [REDACTED] Mississippi, roughly 40 miles away, but I go through Madison County Mississippi probably at least once a month.

1| 24.5

Continuing comments - of all the sites now under consideration, if the NBAF was located in Madison County, it would probably gain the most co-benefit, either percentage wise or overall of any of the locations.

And finally, and hope this one never happens, but while no right thinking citizen of the USA would want it to happen, in the event of an accident or attack, there is a possibility of a release of BL4 pathogens occurring at the chosen location. Considering the prevailing wind velocities and overall population of each location, the Madison County location might be the safest spot to enforce a large area quarantine.

Thank you very much. Ya'll work on it very hard.

Good bye.

Comment No: 1

Issue Code: 24.5

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

Hallauer, Russ

Page 1 of 1

WD0227

From: [REDACTED] Russ Hallauer [REDACTED]
Sent: Monday, August 11, 2008 8:28 AM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1|13.2 | The DEIS does not sufficiently detail the effect of NBAF on the environment and natural resources in Athens, GA.

3|15.2 | Will the Final EIS correct this deficiency? Is the quality of life of Athenians not important to the DHS?

2|25.2 | I am strongly opposed to NBAF. As a local business owner, advertising executive and local music and arts coordinator, I find that the majority of Athenians from all walks of life are also opposed.

Sincerely,
 Russ Hallauer

Comment No: 1 Issue Code: 13.2

DHS notes the commentor's concern regarding potential impacts on natural resources at the South Milledge Avenue Site. Potential effects on biological resources at the South Milledge Avenue Site are addressed in Sections 3.8.3 and 3.8.9 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 with Whitehall Forest. 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 State Botanical Garden and Whitehall Forest. Mitigative 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 in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 2 Issue Code: 25.2

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

Comment No: 3 Issue Code: 15.2

DHS notes the commentor's concerns regarding potential impacts to quality of life. Section 3.10.3 of the NBAF EIS discusses the socioeconomic of the region encompassing the South Milledge Avenue Site including quality-of-life resources and potential impacts from siting the NBAF. Adverse effects to quality-of-life resources would not be expected under any of the site alternatives as discussed in Section 3.10.

Hallman, David

Page 1 of 1

PD0325

August 25, 2008

My name is David Hallman. I'm an engineer, graduate engineer. I live at [REDACTED] Mississippi, [REDACTED]

1|24.5

It is in sight distance of the proposed NBAF lab and I am very much in favor of it, and I feel that the security involved there is the reason that...one of the reasons that I am for it.

I know that it will be secure and it'll provide for our income and help for this part of the community. And I'm very much in favor of the lab here in Flora.

Thank you a lot.

Comment No: 1

Issue Code: 24.5

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

Ham, Jr., Howard

Page 1 of 2

FD0009



**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: Howard C. Ham Jr.
 Title: [REDACTED]
 Organization: [REDACTED]
 Address: [REDACTED]
 City: [REDACTED] State: TX Zip Code: [REDACTED]

Comments: In the decision of selection, it is very difficult to set aside personal preferences, political pressures, and other subtle types of bias not really understood. But, if one can think of a scenario where our very national survival is at stake then biological warfare or terrorist tampering of our homeland's food supply then the choice is clear that the utilization of our military establishment becomes paramount for the sake of our beloved homeland. With San Antonio being the recipient of all the armed forces military medical training, then it becomes apparent that San Antonio is a clear choice for locating the next NBAF. We are in to a new millennium; having the NBAF co-located in close proximity to all this military medical expertise and the spin-offs of such inter-relationships is the best national

(Continued on back for your convenience)

Comment No: 1 Issue Code: 1.0

DHS notes the commentor's opinion that proposed NBAF research would ultimately benefit the U.S. food supply

Comment No: 2 Issue Code: 24.6

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

Comment No: 3 Issue Code: 8.6

DHS notes the information provided by the commentor.

11.0

24.6

8.6

Ham, Jr., Howard

Page 2 of 2

FD0009

cont | 3 | 8.6

interest in countering the unknown threats of the future to our Homeland. When I speak previously consolidated of military specialty training I am referring to BRAC 2005 enactment.

For what it is worth, my first career in the Air Force drew permanent duty assignments in states being considered for NBAF location. Did not live in North Carolina but the others were experienced first hand Kansas (McConnell AFB/Wichita), Georgia (Meadley AFB/Valdosta), Mississippi (Keeler AFB/Biloxi) and New York (Plattsburgh AFB/Plattsburgh) and I can assure those decision makers in the selection process that Texas & in particular San Antonio can out recruit and retain the best research scientists for the taskings of the NBAF. They and their families will reap the benefits of favorable weather conditions, low cost of living, and a super quality of life that makes with the best on our planet.

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

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

TOLL-FREE FAX

1-866-508-NBAF (6223)

Hambricht, W.

Page 1 of 1

MD0039

July 1, 2008

Mr. James Johnson

Dear Mr. Johnson,

We have been asked to help get the NBAF located in Athens, GA. As a businessman -roofing contractor - I am glad to report to you. There are things you need to know about what is going on in the area.


1| 15.2 | A lot of Univ. Of GA folks are upset and likely to oppose it because of threats to employes, they are not saying anything. Even if Obama doesn't win the state, Athens is likely to go for him in a big way. Commissioners trying to help you may go down if there is a big sweep. Many homeowners see business interests as selfishly wanting the location here. New groups of mostly homeowners are backing a slate of commissioners opposed to NBAF.

2| 21.2 | Safety is on the minds of many, including doctors. A rich group of drs. are collecting money for a law suit, according to one rumor. The insect problem here is bad and a lot of people are afraid that livestock diseases will get out.

3| 17.2 | Your estimate says that present roads are adequate around the site. Even commissioners that favor the site know that this is not true. You need to add several million dollars for new roads to satisfy them. If the drought continues, the lab would become very unpopular.
4| 12.2 |

If some of this sounds bad, I am sorry. But things have gone down here your visit and I thought you ought to know.

Sincerely yours,



W.T. Hambricht

Comment No: 1 Issue Code: 15.2

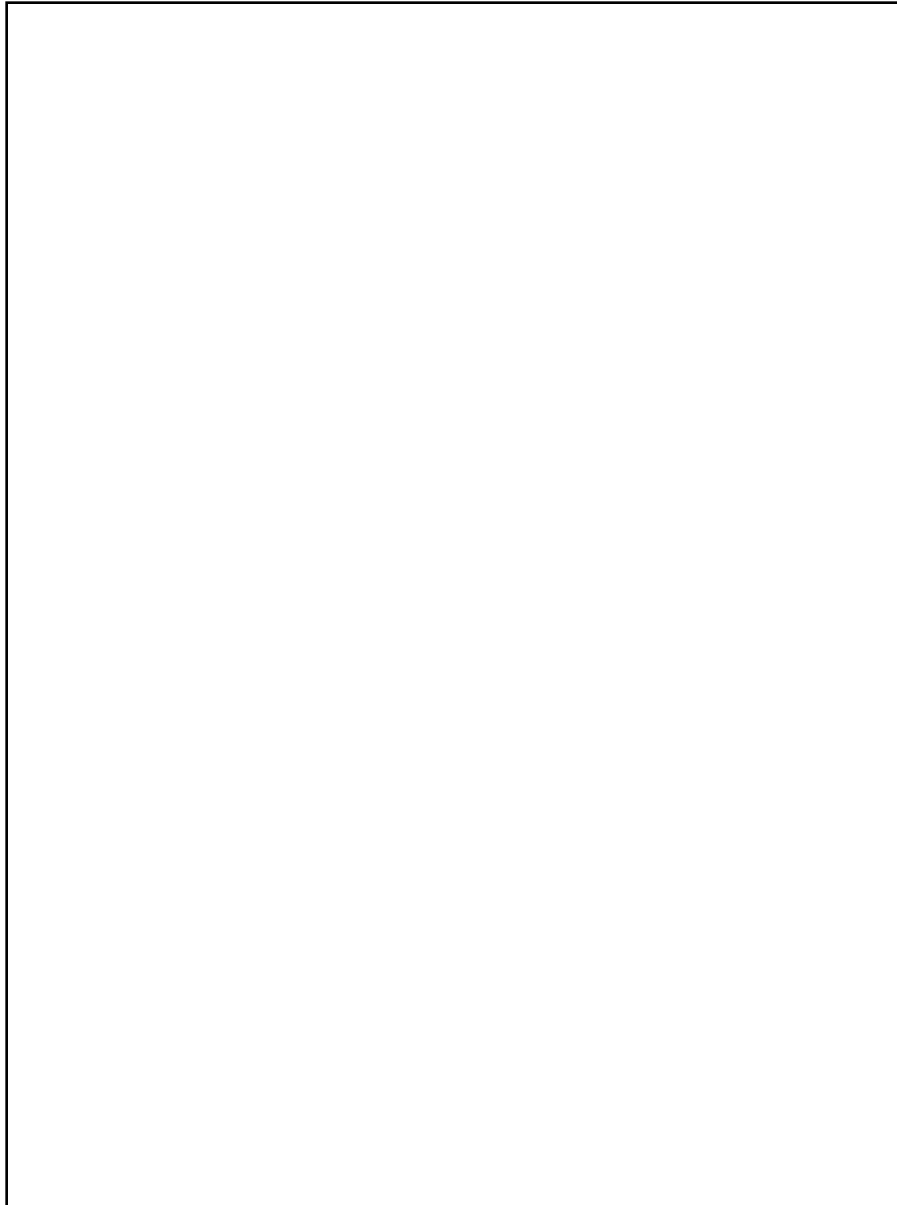
DHS notes the commentor's statement.

Comment No: 2 Issue Code: 21.2

DHS notes the commentor's concerns regarding an accidental release of a vector, such as a mosquito, from the NBAF. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for outside insect vector penetration, laboratory-acquired infections, vector escape and accidental releases. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts each of which has the potential to release a vector. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release of a vector are low. DHS would have site-specific Standard Operating Procedures (SOP) and response plans in place prior to the initiation of research activities at the proposed NBAF. 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. An analysis of potential consequences of a pathogen (e.g. Rift Valley fever virus) becoming established in native mosquito populations surrounding the South Milledge Avenue Site is specifically addressed in Section 3.8.9 and Section 3.10.9.1 as well as in Section 3.14.4.1 (Health and Safety). Section 3.10.9.1 discusses the relative suitability of the regional climate of the South Milledge Avenue Site to promote mosquito survival and virus spread based on the extensive discussion contained in Section 3.4.3.1 of the NBAF EIS. As such, the RVF response plan would include a mosquito control action plan, and the potential consequences of pesticide use in mosquito control would be evaluated during the preparation of a site specific response plan.

Comment No: 3 Issue Code: 17.2

DHS notes the commentor's concern that the current transportation infrastructure in the area of the South Milledge Avenue Site Alternative is described in the NBAF EIS as being adequate in their current condition for the NBAF operation. Section 3.11.3.3.1 of the NBAF EIS acknowledges that several intersections and road segments are currently operating at Level of Service "F", (worst rating). A discussion of the planned improvements to the area's primary transportation corridors of South Milledge Avenue and Whitehall Road is also 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.



Comment No: 4 Issue Code: 12.2
DHS notes the commentor's drought 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 the amount consumed by 228 residential homes.