Kerr, Lindsey

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GAD011

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

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

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: Lindsey K Kerr

Title:

Organization:

Address: [redacted]

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

1| 25.2 Comments: I would like to express concern for the building of the new Defease Facility in Athens, GA.

2| 12.2 First, the use of water by the facility is reported to be equal to that of 250 homes. Georgia is in an extreme draught. Residents have been prohibited from using water for outdoor vegetation and washing cars. The University has shut down fountains and begun using alternative water sources so as to not stress the local water sources. What will be the impact of this facility on local water sources? If the draught continues, as expected, will residents be forced to go without in order to keep the facility operating? Theoretically Athens has enough water to support the Facility, but how will the government respond if (or when) the draught tightens? Who will come first – the lab or the local community?

3| 23.0 Second, I am concerned about the greater environmental impact of the Facility. In other words, the materials that go into construction, the construction equipment and its pollution, dust created by digging and grading, the destruction

4| 13.2 of natural habitat, etc. The re-use or upgrading of the Plum Island facility

(Continued on back for your convenience)

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

Comment No: 2 Issue Code: 12.2
DHS notes the commentor's drought concerns and DHS acknowledges 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. If NBAF is built and following site selection and final design, water conservation measures will be addressed.

Comment No: 3 Issue Code: 23.0
DHS notes the commentor's concern regarding the environmental impacts associated with the building materials and construction of the NBAF at the South Milledge Avenue site. Section 2.2.1 (Construction Requirements) of the NBAF EIS, provides information on construction requirements, biosafety design and construction schedule and activities, and includes general information on building materials. Section 3.3.3 of the NBAF EIS includes an assessment of the current utility infrastructure, a discussion of the potential cumulative environmental effects on the particular utility resource from the construction and operation of the NBAF, the identification of any utility infrastructure improvements necessary to meet design criteria and insure safe operation and the environmental impact from the operation of the NBAF at the South Milledge Avenue site.

Comment No: 4 Issue Code: 13.2
DHS notes the commentor's concern regarding wildlife habitat in the vicinity of the South Milledge Avenue Site. As indicated in Section 3.8.3.2.4, 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 the Whitehall Forest IBA. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the Botanical Garden and the Whitehall Forest IBA. Section 3.5.5.3 addresses operational noise impacts associated with the proposed NBAF. 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. In the event of a power outage, operation of back-up generators could have a short-term impact on wildlife by discouraging utilization of immediately adjacent habitats. Routine operations at the NBAF would not be likely to have significant noise impacts on wildlife. Security requirements at the proposed NBAF would require continuous outdoor

nighttime lighting. Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigative measures, such as the use of shielded lighting, will be considered in the final design of the NBAF. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. However, the use of shielded lighting would minimize the potential for impacts in adjacent habitats. Given the relatively low profile of the building and the use of mitigative measures, significant lighting impacts on migratory birds would not be likely to occur. 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.

Kerr, Lindsey

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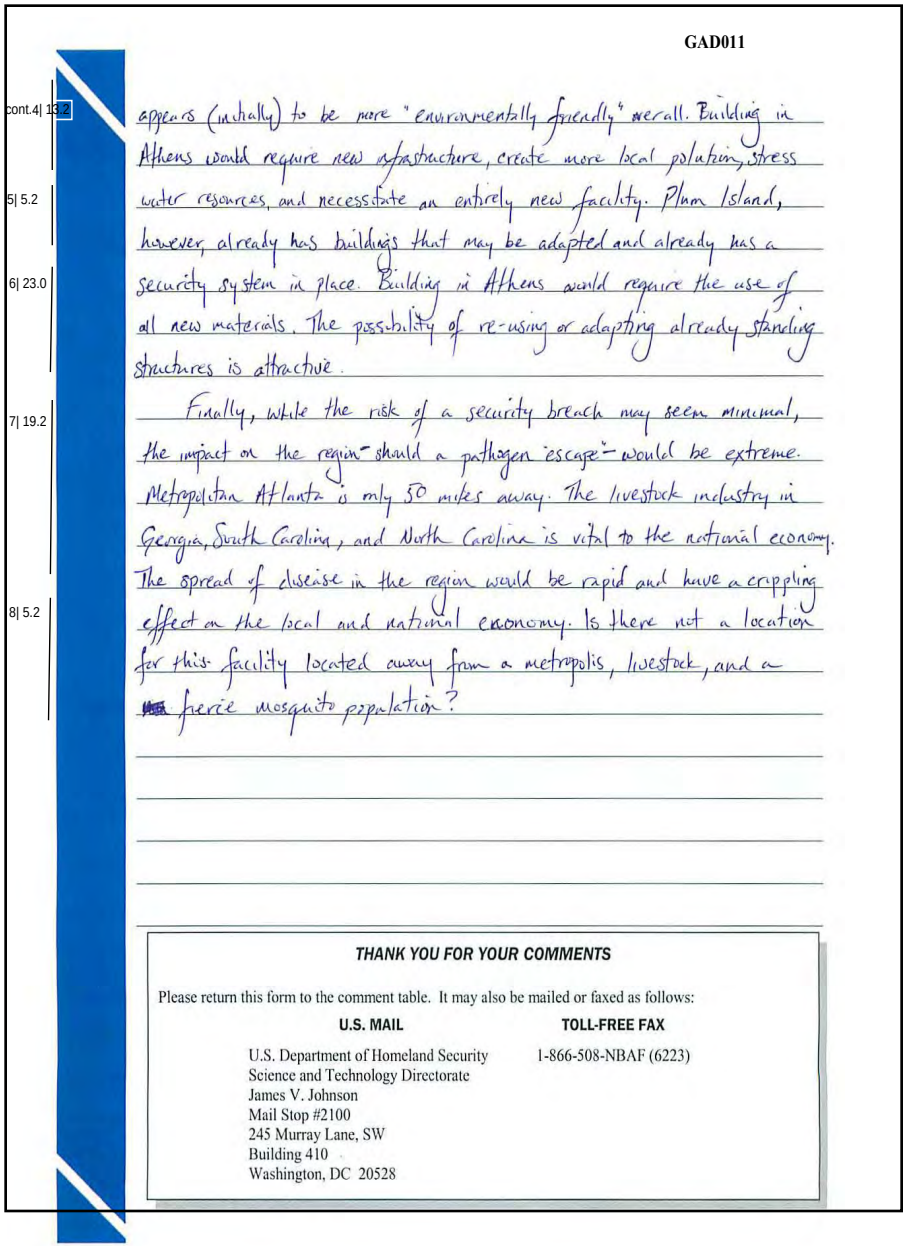

GAD011

cont.4| 13.2 appears (initially) to be more "environmentally friendly" overall. Building in Athens would require new infrastructure, create more local pollution, stress water resources, and necessitate an entirely new facility. Plum Island, however, already has buildings that may be adapted and already has a security system in place. Building in Athens would require the use of all new materials. The possibility of re-using or adapting already standing structures is attractive.

5| 5.2

6| 23.0

Finally, while the risk of a security breach may seem minimal, the impact on the region should a pathogen escape would be extreme. Metropolitan Atlanta is only 50 miles away. The livestock industry in Georgia, South Carolina, and North Carolina is vital to the national economy. The spread of disease in the region would be rapid and have a crippling effect on the local and national economy. Is there not a location for this facility located away from a metropolis, livestock, and a fierce mosquito population?

7| 19.2

8| 5.2

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)

Comment No: 5 Issue Code: 5.2

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

Comment No: 6 Issue Code: 23.0

DHS notes the commentor's statement.

Comment No: 7 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, including releases due to weather events. 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. 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.

Comment No: 8 Issue Code: 5.2

DHS notes the commentor's statement that a site be selected away from people, livestock, and mosquito populations.

Kielhurn, Laura

Page 1 of 1

WD0244

From: Laura Kielhurn [redacted]
Sent: Wednesday, August 13, 2008 10:00 AM
To: NBAFProgramManager
Subject: Plum Island

1|25.1 You can't really be serious about upgrading Plum Islands bio-chemo as a defense in the backyard of so many American citizens - PLEASE reconsider your choices!!!!

Comment No: 1 Issue Code: 25.1
DHS notes the commentor's opposition to the Plum Island Site Alternative.

Kiesow, Patricia

Page 1 of 2

MD0015

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

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

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: Patricia Kiesow

Title: Community Volunteer

Organization:

Address: [redacted]

City: [redacted] State: N. C. Zip Code: [redacted]

Comments: I want to thank the Department of Homeland Security for their sponsorship of the hearings on Tuesday, July 29, 2008. My only complaint would be the wish that you had come earlier.

I also want to apologize for the members of the GNAT group and their rather rude behavior. It would appear that their only reason for having you there was to attack you. Obviously they had their minds made up and nothing could have changed this stance.

My husband and I attended the afternoon session. GNAT dominated the session and from reports also the

(Continued on back for your convenience)

Kiesow, Patricia

Page 2 of 2

MD0015

1| 24.3

evening session.

We both support the need for the research and would welcome the lab here in Granville County. With the Research Triangle Park, three Universities and the development of a mini-research hub in Northern Granville it would make for a perfect fit.

As I said at the close of the session, "Thank you for coming, the facility is needed and may the best site be chosen."

Sincerely,

Patricia Kiesow

THANK YOU FOR YOUR COMMENTS

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Science and Technology Directorate
James V. Johnson
Mail Stop #2100
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Building 410
Washington, DC 20528

TOLL-FREE FAX

1-866-508-NBAF (6223)

Comment No: 1 Issue Code: 24.3

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

Kilpatrick, Cardee

Page 1 of 1

WD0356

From: cardee kilpatrick [redacted]
Sent: Tuesday, August 19, 2008 12:27 PM
To: NBAFProgramManager
Subject: Athens, GA site

1|24.2 I'm writing in support of locating the NBAF facility in Athens, GA. It's the perfect location which is near the vet school and in a community where employees will enjoy living.

Cardee Kilpatrick
[redacted]

Comment No: 1 Issue Code: 24.2
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

King, Christopher

Page 1 of 2

CHRISTOPHER KING
[redacted]
GAD005

My name is Chris King. I am a veterinarian and a board certified specialist in laboratory animal medicine. I work for the VPR and I've been involved with our NBAF bid since its inception. In my work I've site visited and benchmarked containment research facilities in the US, Canada, and Europe. I have been involved in the design and construction of containment research facilities. I am currently involved in biosafety training, occupational health, and emergency response preparation for high level containment and I work hand in hand with the scientists and staff doing this important research.

1| 1.0 There are nearly 1500 diseases recognized in humans and about 60% are due to pathogens that can move across species lines. In the last 30 years, 75% of new emerging human infectious diseases have been zoonotic. This list includes Lyme disease, West Nile virus, Nipah virus, Hendra virus, SARS, and avian influenza to name a few.

None of these diseases has emerged because of acts of bioterrorism. This is not about bioterrorism. This is about a changing world of global travel, global trade, and environmental change. This is about public health, biomedical research, and the global food system.

NBAF is about understanding how to deal with some of the worst things Mother Nature can throw at us. NBAF is about collaborative efforts of multiple disciplines working locally, nationally, and globally to attain optimal health for people, animals, and our environment.

Our community has well founded concerns about having this type of research and these diseases in our back yards. Most, however, understand the reality that our back yards now stretch to every corner of the globe. In fact, many of these diseases are knocking on our front door every time an international flight arrives at Hartsfield or a container ship docks in Savannah. NBAF is about being prepared for this eventuality.

2| 5.0 Many in our community believe in the NBAF mission but some prefer that it remains at Plum Island or some other remote location. Fifty years ago when Plum Island was established, locating the facility at a remote location made sense. However, contemporary technology and containment practices allow high level containment facilities to safely coexist in urban and rural locations throughout the world.

Comment No: 1 Issue Code: 1.0
DHS notes the commentor's statement.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's statement. 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.

King, Christopher

Page 2 of 2

GAD005

cont. 2| 5.0 Locating NBAF in a remote location will only impede science. Successful science is a human endeavor that still requires face to face and hands on interactions. More importantly successful science requires broad collaboration. Attracting top notch scientists and collaborators to NBAF is critical to its mission and being part of a vibrant community with a great quality of life is as important to these people as it is to any of us here.

I have lived in Athens for 15 years. This is my home. My house is located within the 6 km Gaussian plume drawn around the NBAF site. Like everyone in this room, I love this city and the quality of life it affords – the culture, the arts and music scenes, the restaurants and bars, our downtown, and the university.

3| 24.2 Like many in this room I've been alarmed at the big box development and sprawl that's characterized our recent growth. We must have a strong economy but we have got to grow smartly. There is nothing smarter than taking advantage of our intellectual capital. Knowledge-based development that brings research and technology jobs to our region is crucial for a vital economy and to secure our quality of life. NBAF will bring this to Athens. Fortunately, Athens is also the best site for NBAF.

4| 21.2 This being said though, NABF does come with some risk. That is made clear in the draft EIS. However, no development comes without risk or liability. I applaud the many, many citizens of Athens, including our government leaders, who have worked through the noise and distraction ~~of the torch and pitchfork crowd,~~ have asked good questions of real experts, and critically assessed the risks and benefits

cont. 3| 24.2 and would gladly welcome NBAF to Athens. NBAF is right for Athens. Athens is right for NBAF. created by NBAF opponents

Thank you.

Comment No: 3 Issue Code: 24.2
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

Comment No: 4 Issue Code: 21.2
DHS notes the commentor's statement.

King, Matt

Page 1 of 2

WD0183

From: Matt King [redacted]
Sent: Tuesday, August 05, 2008 12:54 PM
To: NBAFProgramManager
Subject: NBAF in Kansas

To Whom it May Concern:

1| 24.4 As a recent graduate of Kansas State University, I have recognized first-hand the world-class expertise, facilities and support provided by the University, Manhattan, and the bio-sciences corridor in NE Kansas. The professionals and support infrastructure in Kansas - and specifically at the proposed site - are truly unmatched throughout the country, and as such DHS would be wise to site NBAF in the state.

The safety and security of our food sources - both animal and crop-sourced - is vital to our country's health and strength. As such, it is important to site NBAF where the expertise, professionals and science is best. This cannot be a political decision and must be one made on the merits. Because Kansas State University (and all its component parts, including the Pat Roberts Biosecurity Research Institute and the Colleges of Agriculture and Veterinary Medicine) is a world-class leader in animal and agricultural health research and development, it is simply the best place to perform this research.

As such, I urge you to site the NBAF facility at the Kansas site to ensure that the health and safety of America's food supplies are protected to the greatest possible level.

Please do not hesitate to contact me if you have any questions or comments.

Best,

Matt King
[redacted]

--
Matt King
[redacted]

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

King, Matt

Page 2 of 2

WD0183

[redacted]

King, Suzanne

Page 1 of 1

WD0634

From: Suzanne King [redacted]
Sent: Saturday, August 23, 2008 4:45 AM
To: NBAFProgramManager

1|25.2 I am opposed to NBAF being sited in Athens, Georgia.

A concerned resident,
Suzanne King

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

Kinman, Alice

Page 1 of 1

WD0348

From: Alice Kinman [redacted]
Sent: Tuesday, August 19, 2008 9:56 AM
To: NBAFProgramManager
Subject: NBAF in Athens

Dear Sir or Madam:

1|24.2 I would like to express my strong support for locating the NBAF in Athens, Georgia. I know you are aware that we have some vocal opposition to the facility, but we have a great deal of quiet support as well. I have spoken with many people who think that the combination of research facilities already existing in Athens and Atlanta, as well as those planned, create the perfect environment for the type of research to be carried out at the NBAF. In addition, the quality of life is extremely high in Athens, which will make your job of recruiting top-quality scientists easier.

Thank you for considering Athens.

Sincerely yours,

Alice Kinman
Commissioner, District 4
Athens-Clarke County
323 Milledge Terrace
Athens, GA 30606
(706) 613-6668

Comment No: 1 Issue Code: 24.2
DHS notes the commentor's support for the South Milledge Avenue Site Alternative.

Kirby, Kim

Page 1 of 1

CD0408

From: [redacted] on behalf of Kim Kirby [redacted]
Sent: Monday, August 25, 2008 12:02 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 21.2 | As a resident of Athens Georgia and as a newly wed about to bring up a family here, I am very upset that the NBAF would even be considered for Athens. 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| 23.0 | How would DHS respond to a release of mosquitoes and other vectors? The EIS needs to show a detailed plan.

Sincerely,
Kim Kirby

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. A discussion of insectary operations is contained in Section 2.2.1 and elsewhere in the NBAF EIS. Section 2.2.1.1 (Biosafety Design) of the NBAF EIS, also provides a discussion of the biosafety fundamentals, goals and design criteria for the NBAF operation. In addition, information has been added to Chapter 2 regarding operations and containment of arthropod vectors. 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: 23.0

DHS notes the commentor's concerns regarding the site specific plans to respond to the accidental release of a vector, such as a mosquito, from the NBAF. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the South Milledge Avenue Site, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area, to include agricultural livestock and wildlife. 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 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.

Kirkwood, Arlen

Page 1 of 1

PD0203

August 22, 2008

1| 5.0 Yes. I think that the idea of putting a bio lab at K-State or in…on the mainland, any place on the mainland is a very, very bad idea. And I'm just an individual but most of the people I've talked to in my area around [redacted] Kansas thinks it's a really, really bad idea to do that in case some of those things might escape and cause total havoc with the livestock industry. It would bankrupt everyone that has to deal with livestock. And I think it's a really poor idea to even be considering putting one here. No matter how many precautions you take there is still that chance that it could happen.

2| 21.4
3| 15.4
4| 25.4

Thanks for your time. And my name is Arlen Kirkwood.

Thank you. Bye.

Comment No: 1 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 2 Issue Code: 21.4
DHS notes the commentor's concern. The risk of an accidental release of a pathogen from the NBAF is extremely low. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents,, external events, and intentional acts. As described in Section 2.2 of the NBAF EIS, the NBAF would provide state-of-the-art biocontainment features and operating procedures to minimize the potential for laboratory-acquired infections and accidental releases.

Comment No: 3 Issue Code: 15.4
DHS notes the commentor's concern. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively.
As noted in Section 3.10.9 and Appendix D, the major economic effect from an accidental release of a pathogen would be a ban on all U.S. livestock products until the country was determined to be disease-free. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

Comment No: 4 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Kissick, Stacy

Page 1 of 1

WD0648

From: Stacy Kissick [redacted]
Sent: Friday, August 22, 2008 6:07 PM
To: nbafprogrammanager@dhs.gov
Subject: NBAF lab in Manhattan, Kansas

Dear Sir or Madam,

1|25.4 I live in [redacted] Kansas, one of the towns on the shortlist for the relocation of a new NBAF laboratory. I am writing to add my voice to those who have already said that they do not want the lab here in town.

For safety and other issues, I ask that you please not choose Manhattan for the location of the NBAF.

Thank you,
Stacy Kissick
[redacted] Kansas

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

Klainbaum, Abel

Page 1 of 1

WD0733

From: [redacted]
Sent: Monday, August 25, 2008 1:59 PM
To: NBAFProgramManager
Subject: Athens GA- NO vote for NBAF

Dear NBAF program manager:

1|25.2 Just a simple note to cast my NO vote for NBAF in Athens. It seems that the pristine site by the botanical garden is a terrible choice for this. This dangerous and probably important work should be in a safer area, more like Plum Island and less like Athens.

Unfortunately, too many people opposed to this project work for the university, so they are scared to comment. Either way, thank you for taking the time to allow for community input.

Abel Klainbaum
[redacted]GA

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

Klein, Barbara

Page 1 of 1

WD0547

From: Janet Klein [redacted]
Sent: Monday, August 25, 2008 1:00 AM
To: NBAFProgramManager
Subject: no nbaf on the mainland

August 24, 2008

To Whom It May Concern:

1| 25.4 I want to keep this note short. To me the 3 most important reasons not to have the NBAF laboratory in Manhattan, Kansas are:

2| 15.4
3| 21.4
1. Manhattan is a college town with a melting pot of nationalities for students. Also, being close to Fort Riley, this makes it a target for possible terrorist activity.

4| 6.4
2. Manhattan is in the heart of the US livestock industry, and has a high white tail deer population. This could easily spread any escaped pathogens through out the Midwest in a short period of time.

3 cont| 21.4
3. Tutle Creek Dam (located on the north side of Manhattan, Kansas) is built on a fault-line, and Kansas is in tornado alley.

Thank you for your time.

Sincerely,

Barbara Klein

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

Comment No: 2 Issue Code: 15.4
DHS notes commentor's concern for security of the NBAF at the Manhattan Campus Site Alternative. A Threat Risk Assessment (TRA) was prepared that evaluated site-specific security issues, but the document will not be released to the general public due to the sensitive nature of the information. The NBAF would have the levels of protection and control required by applicable DHS security directives and designed to accomodate the applicable site specific conditions outlined in the TRA.

Comment No: 3 Issue Code: 21.4
DHS notes the commentor's concern that the NBAF would be a prime terrorist target. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) (designated as For Official Use Only and not available to the public for security reasons) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Comment No: 4 Issue Code: 6.4
DHS notes the commentor's statement. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the 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). The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g., Rift Valley fever virus) becoming established in native mosquito populations, particularly in warm, humid climates, was evaluated in Sections 3.8.9, 3.10.9, and 3.14. The potential response measures that could be employed in the event of an accidental release are described in Section 3.8.9 of the NBAF EIS. Table 3.8.9-1 describes the potential response strategies that could be considered in the event of an accidental release. Depopulation or population reduction is one of ten potential FMD response strategies developed by the National Park Service. However, the National Park Service recommends the use of other strategies or combinations of strategies to avoid depopulating wildlife (see Table 3.8.9-1). A more likely scenario would include one or more of the non-lethal measures described in Table 3.8.9-1. In the event that depopulation or population reduction was determined to be the most appropriate course of action, hunting with firearms would be the likely method for implementing this strategy. The response to an accidental

release of a mosquito-borne pathogen such as Rift Valley fever could include the aerial application of insecticides. The use of insecticides could lead to direct adverse impacts on insect fauna, as well as indirect impacts on other wildlife species through disruption of the food chain. Although the NBAF EIS acknowledges the potential for significant impacts on white-tailed deer 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 (CDC) 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.

Klein, Bob

Page 1 of 1

CD0801

From: [redacted]on behalf of Bob Klein [redacted]
Sent: Tuesday, August 12, 2008 10:40 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 12.2
2| 21.0
NBAF has been promoted by ever-changing "facts" put out by UGA and DHS. Why do you choose to gloss over the real dangers presented by NBAF in the middle of our community? How does DHS propose to deal with our 100-year drought that is still persisting? Do you plan to "trust" Mother Nature just as you ask us to "trust" technology and training to keep a catastrophic accident from occurring?

3| 25.2
We do not want NBAF in Athens!

4| 2.0
The mission of Homeland Security is to protect Americans; not put them in danger. You are failing to do your mission if you build this lab in Athenas, GA.

Sincerely,
Bob Klein

Comment No: 1 Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges regional drought conditions. As described in the NBAF EIS Section 3.7.3.3.1, the NBAF at the South Milledge Avenue Site 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: 2 Issue Code: 21.0

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including releases due to weather events. 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. 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.

Comment No: 3 Issue Code: 25.2

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

Comment No: 4 Issue Code: 2.0

DHS notes the commentor's lack of confidence in the DHS and concerns regarding safe facility operations. 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. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 and Appendix E of the NBAF EIS. The risks were determined to be low for all site alternatives. 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.

Klein, Janet

Page 1 of 3

WD0341

From: Janet Klein [redacted]
Sent: Tuesday, August 19, 2008 2:05 AM
To: NBAFProgramManager
Subject: no nbaf in kansas

1|25.4 I am writing in strong opposition to the proposed NBAF laboratory in Manhattan, Kansas. I believe this is a grave error and an irresponsible move. Would you put a fox in a chicken coop? So, why would you put the worst pathogens on earth in the middle of livestock country?

This very fact leads me to believe this laboratory is all about money and greed. It appears to me, the only people who are in favor of this proposed laboratory at Kansas State University are the people without livestock and the ones who will stand to benefit monetarily. Did Kansas State University ever consider that parents may not want to send their children to a university where their children could contract a disease if there was a leak in this laboratory? If parents are aware of this there will definitely be a drop in enrollment. This could create quite a loss of income for the University and the City of Manhattan. How would this be dealt with?

2|18.4 My daughters (who attend K-State) have told me how they suspect there are sewage problems in Manhattan? So, how would the sewage problems be handled at the proposed laboratory? These are just a few problems that could be tied to this proposed laboratory in Manhattan, Kansas.

I believe this research is valuable and needed. At the same time, I
3|21.4 have heard about the man who was sending Anthrax out into the population and how another scientist (trained at MIT) was trying to destroy Plum Island. (We need to keep in mind that Scientists are human beings

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

Comment No: 2 Issue Code: 18.4
DHS agrees that existing infrastructure at any chosen NBAF location has to be adequate to handle proposed NBAF operations. Section 3.3.4.3.4 of the NBAF EIS explains that the City of Manhattan, Kansas is currently designing a new wastewater treatment plant and that the wastewater discharge projections for the proposed NBAF are being incorporated into the design criteria for the new plant. As discussed in this section, the NBAF would be designed and operated as necessary to prevent negative impact from either flow rate or constituents to the capabilities of the City of Manhattan wastewater treatment plant.

Comment No: 3 Issue Code: 21.4
DHS notes the commentor's concerns. The risk of an accidental release of a pathogen from the NBAF is extremely low. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including internal and external events such as an "insider" criminal act and terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) (designated as For Official Use Only and not available to the public for security reasons) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Section 3.10.9 and Appendix D of the NBAF EIS presents estimates of the possible economic effect of an accidental release, which would be significant for all sites.

Klein, Janet

Page 2 of 3

WD0341

3 cont.| 21.4 with emotions too. Students are even more emotional --as any parent would know)! The reason this operation to destroy Plum Island was foiled was the amount of security working on this detail. I feel that there will not be enough security in Manhattan to fend off the number of people that would want to destroy this laboratory. There are not enough barriers, just students and permanent residents. I believe this would mean the University and the City of Manhattan would have the expense of beefing up their security, and that sounds pretty costly.

Another thought to keep in mind is that Kansas State University has a student population that is like a "melting pot". How is it possible to know the background of such a diverse group? After all, look at the woman from MIT. This could very easily happen at Kansas State University!

Now let's talk about economics. Doesn't anyone consider this aspect? Sure the facility will bring a few jobs to Manhattan. This is a short-term economic factor, but shouldn't we consider long-term effects?

3 cont.| 21.4 What happens when there is a leak (and you know it will happen whether it is an act of God or by human error)? There would be a chain of effects on the economics of the NATION not just Manhattan, Kansas. And what happens to the producers that will loose everything they have spent their life building? Who will reimburse them? You could expect riots in the street! I am sure there would be more of a need for security then!

Let us remember why this laboratory was built on an island in the

4|5.1 first place. It was because the island was isolated! **Let us show that we can be as wise as the Scientist that first opened the Laboratory on Plum Island in the 1920's. Let's keep the laboratory on Plum Island where it belongs!**

Thank you for taking your time to read this letter. My husband

Comment No: 4 Issue Code: 5.1

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

Klein, Janet

Page 3 of 3

WD0341

and I are livestock producers. We are both graduates from Kansas State University. Therefore, we want the best for Kansas State and Manhattan. We also want the best for our family. But if we had to destroy our whole cattle herd that we have worked so hard to build and manage, we would be devastated and would have no where to turn!

Sincerely,

Janet R Klein

Klein, Janet

Page 1 of 1

WD0549

From: Janet Klein [redacted]
Sent: Monday, August 25, 2008 12:58 AM
To: NBAFProgramManager
Subject: no nbaf in the heartland

August 24, 2008

To Whom It May Concern:

1| 25.4 I am a livestock producer in Northeast Kansas. I am in strong opposition of the NBAF laboratory locating in Manhattan, Kansas. I would like to voice two main concerns about the proposed laboratory:

2| 15.4
1. An accidental release of pathogens would disrupt and devastate the cattle industry in the Midwest for years to come causing high food prices domestically and destroy the international market we have so diligently worked to open for the last several years.
2. Rumors of accidental releases will continually cause fluctuations in the market.

Thank you for your time.

Sincerely,

Rick Klein

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

Comment No: 2 Issue Code: 15.4
DHS notes the commentor's concern. The risk of a pathogen release from the proposed NBAF at each of the proposed sites was evaluated in Secion 3.14 of the NBAF DEIS and was determined to be low for all sites. The potential economic effects including those from an accidental release are discussed in Section 3.10.9 and Appendix D of the NBAF DEIS. The primary economic effect of an accidental release would be the potential banning of U.S. livestock products regardless of the location of the accidental release. Other economic impacts were considered negligible in comparison to the foreign trade ban impacts.

Klein, Rick

Page 1 of 1

WD0548

From: Janet Klein [redacted]
Sent: Monday, August 25, 2008 12:59 AM
To: NBAFProgramManager
Subject: no nbaf in the heartland

August 24, 2008

To Whom It May Concern:

1| 25.4 I am a livestock producer in Northeast Kansas. I am in strong opposition of the NBAF laboratory locating in Manhattan, Kansas. I would like to voice two main concerns about the proposed laboratory:

2| 15.4
1. An accidental release of pathogens would disrupt and devastate the cattle industry in the Midwest for years to come causing high food prices domestically and destroy the international market we have so diligently worked to open for the last several years.
2. Rumors of accidental releases will continually cause fluctuations in the market.

Thank you for your time.

Sincerely,

Rick Klein

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

Comment No: 2 Issue Code: 15.4
DHS notes the commentor's statement.

Kline, Janet

Page 1 of 1

PD0253

August 23, 2008

1| 25.4 This is Janet Kline and I am very much opposed to the NBAF at Manhattan, Kansas. My husband and I are livestock producers and we think it is not good for the welfare of our livestock. It is also not good for the people in the area because of the zoological

2| 19.4 ramifications if the disease were to transmit to a human.

1 cont.| 25.4 So please, do not put NBAF in Manhattan, Kansas.

Thank you very much for listening to my comments.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative based on risks to livestock. The NBAF would be designed and constructed using modern biocontainment technologies, and operated by trained staff and security personnel to ensure the maximum level of worker and public safety and least risk to the environment in accordance with all applicable federal, state, and local laws and regulations.

Comment No: 2 Issue Code: 19.4

DHS notes the commentor's concern. Risks to human populations at each alternative site were evaluated and discussed in Section 3.14 and Appendix E of the NBAF EIS. The risk of an accidental release of a pathogen from the NBAF is extremely low.

Klug, Tom

Page 1 of 1

WD0616

From: Tom Klug [Tom.Klug@haakeins.com]
Sent: Saturday, August 23, 2008 2:43 PM
To: NBAFProgramManager
Subject: NBAF in Manhattan, KS

1|24.4; 2|8.4

This is a short message of support for the siting of the new NBAF in Kansas. Kansas is the absolute best choice for many reasons, including:
1. Tremendous local and regional support for the facility by the people and institutions in the area....it's important that the facility gets a truly supportive welcome and follow-on support.
2. The unique array of local assets and resources that can assist and support the facility....too numerous to mention in this short e-mail, but truly impressive from a governmental, financial, and scientific perspective.
KANSAS is the clear best choice for the new NBAF site. Thanks for taking this e-mail,
Tom Klug

Tom klug
Managing Director
Haake Cos. ...an Assurex Global Partner
4650 College Blvd.
Overland Park, KS 66211
Dir: 913 529-3274
Mobile: 816 210-4327
Tom.klug@haakeins.com

This eimail sent from
My BlackBerry mobile device

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

Comment No: 2 Issue Code: 8.4
DHS notes the commentor's opinion.

Knoop, Jennie

Page 1 of 2

WD0775

From: Jennie Knoop [redacted]
Sent: Monday, August 25, 2008 4:18 PM
To: NBAFProgramManager
Subject: Proposed NBAF

Dear Jamie,

I hope all is well with you. I'm the former Granville county hospice chaplain, now a counselor. We met again when you were here in Granville County recently. I'm going to take a different angle here, and discuss the *global* environmental impact.

I was a navy brat and grew up partly in the South Pacific. Old bomb shelters, abandoned runways, and wrecked planes were so our playgrounds. I learned a lot about the many kinds of debris that war leaves behind. More and more I've been thinking about that post-war landscape and the potential environmental impact globally of NBAF. We are at war. If I were an Irani, I'd be as concerned about the US gathering up all those terrible pathogens into a billion-dollar lab fortress , as we are about their building nuclear weapons. Regardless of the stated intentions of the DHS, our presence in Iraq sends a different message. Perceptions of NBAF could well contribute to an expanding war in the Mideast. 1| 1.0

I believe that scientific research in any area that impacts the health and survival of humanity belongs to humanity. What doesn't work for me with this project is that finding cures for deadly diseases is attached to a defense goal and managed by a defense organization. In my opinion, scientific research in any area that impacts the health and survival of humanity belongs to humanity. Millions of human beings internationally have died terrible deaths from these diseases. We as a nation, should we enter such research, are ethically accountable to those people, and to the planet-wide community of suffering. I feel that working for our exclusive safety, and the safety of our own flocks and herds, is ethically problematic.

Your responsibility at DHS is to protect the people of our nation from terrorists and other threats. I believe the absolutely best option is to work with existing domestic and international labs, with a single pathogen per lab. And instead of the costly construction planned for NBAF, let each nation enhance space in existing labs. There should be no more than one deadly incurable bug per lab, although several labs could be working on the same bug. A single pathogen makes for optimal safety and preparedness should any outbreak occur. Community awareness of symptoms means a fast response and enhanced odds of containment. Any multi-national team can work closely together with the benefit of computer-screen, real-time "live " TVcontact. 2| 5.0

The creation of coalitions and colleagues between nations is at the core of global security. An international, humane effort to find cures can engender positive responses within populations who may presently resent our country. This infinitely diminishes the odds of terrorist

Comment No: 1 Issue Code: 1.0
DHS notes the commentor's viewpoint. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's suggestion.

Knoop, Jennie

Page 2 of 2

WD0775

interference. In 2005, after the tsunamis, a navy hospital boat was dispatched to Indonesia. At that point, US approval ratings were very low, since the islands are Muslim, and we were killing Muslimms in Iraq.. But when the hospital boat left, US approval ratings there had risen to a high level. This resulted in a significant change in policy within the Department of Defense. They issued a document (3000.05) in 2005 which states that support operations and missions are now the highest priority, on a par with defense operations. I suggest you read it.

Thank you for reading this.
Sincerely

Jennie Knoop
[redacted]
[redacted] NC [redacted]

Koch, Jr, George

Page 1 of 2

WD0289

From: George Koch [redacted]
Sent: Friday, August 15, 2008 3:19 PM
To: NBAFProgramManager
Subject: Re: Comment on NBAF Draft EIS

Thanks for your reply; I'm still learning IMAC's protocols. Can you accept this? George Koch

080814 NBAF

I am George S. Koch, Jr., [redacted] with a PhD degree in geology from Harvard University. I've spent many years as an employee and later consultant to government and industry, specializing in mining geology and in appraisal of geological risk.

In the 1980's, I worked for the U.S. Department of Energy (DOE) locating potential sites for disposal of nuclear waste in Georgia. One criterion was earthquake risk.

The statement in the Georgia Consortium's Executive Summary (page 4) "the Athens/Atlanta region is free from typical natural disasters such as hurricanes and earthquakes" means in regard to earthquakes only that a severe one is not recognized in the historical record, not that an earthquake will never occur.

1|11.2 Precisely because there are so few recorded large earthquakes in Georgia, the risk of one happening in Athens during the life of the proposed laboratory is extremely difficult if not impossible to evaluate. Although the risk is small, geologists understand that rare events do in fact occur, as the geological record, extending over millions of years, amply demonstrates.

In historical time, the Katrina disaster is sufficient example of a rare natural event that happened although the risk was thought to be remote. And the 9/11 terrorist attack exemplifies another sort of event thought to be of insignificant risk before it happened.

2|5.1 Because of earthquake risk alone, and because there is no compelling reason to build the proposed laboratory in Athens, prudence dictates the selection of an island, Plum Island, or the equivalent, separated by a sufficient water barrier from the mainland, inconvenient though

Comment No: 1 Issue Code: 11.2

DHS notes the commentor's concerns regarding earthquakes. Section 3.6.1 of the NBAF EIS describes the methodology used to assess each site's potential seismic consequences, and Section 3.6.3 specifically describes the South Milledge Avenue Site. The NBAF would be built to meet or exceed all applicable building codes for seismic safety. Section 3.14.3.2 further addresses NBAF design criteria and accident scenarios associated with natural phenomena events such as earthquakes.

Comment No: 2 Issue Code: 5.1

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative in favor of the Plum Island Site Alternative.

Koch, Jr, George

Page 2 of 2

WD0289

2 cont.| 5.0 | this may be.

On Aug 15, 2008, at 2:21 PM, NBAFProgramManager wrote:

> There is no filetype specified with this file, so it is unreadable.
>
> Can this comment be submitted via Word or by including the text in the
> body of an email?
>
> Thank you,
> NBAF Program Manager
>
> -----Original Message-----
> From: George Koch [redacted]
> Sent: Friday, August 15, 2008 9:53 AM
> To: NBAFProgramManager
> Cc: George Koch
> Subject: Comment on NBAF Draft EIS
>
> Please acknowledge receipt of this comment. Thanks, George Koch
>
>
>

Kohn, Lynn Mitchell

Page 1 of 1

MD0121

[redacted]
[redacted] NC [redacted]
August 14, 2008

Mr. James Johnson
U. S. Department of Homeland Security
245 Murray Lane, SW;
Building 410
Washington, DC 20528

Dear Mr. Johnson:

I would like to submit comments on the NBAF proposed for Butner, NC. I am a long-time resident of [redacted] located not far from the proposed site.

1| 20.3 As a concerned citizen, I attended the afternoon session of the July 29th hearings. Like many people present, I found that, despite its imposing length, the DEIS did not address many issues. As a potential location for a bio-lab, Butner has many special problems, including a population of several thousand institutionalized people for whom there is no evacuation plan. Butner is located in the drought-stricken Southeast, where

2| 12.3 mandatory water restrictions are now in effect. The facility which would use 39.5 million gallons a year would. be sited near the sources of drinking water for Granville, Durham, and Wake Counties. The region can not afford to take any chances with such a precious and increasingly scarce resource.

Citizens have been provided with a list of the diseases that would be studied when the lab opens, but that is subject to change. It is not clear what other diseases would be studied during the fifty years the facility would be in operation, or if local citizens would be informed. Also how the pathogens involved would be safely transported from one lab to another?

3| 18.3 The NBAF would test diseases on large animals, and the study does not say how the animal carcasses and lab waste would be disposed of or where hazardous waste would be transported. In addition, many contagious diseases are spread by insects. The DEIS

4| 19.3 reports that this problem would be dealt with by pesticides. However even massive spraying of insecticides could not eliminate all the mosquitoes, ticks, etc involved. Furthermore, the toxic and carcinogenic nature of pesticides could make the proposed solution itself a public health hazard. These are just some of the questions unanswered by the DEIS.

Finally community acceptance, which is quite rightly an important component of the selection process is demonstrably lacking in Butner. Private citizens, civic groups,

5| 25.3 professional organizations, and public officials have all made their opposition clear. For all these reasons, I ask you not to place the NBAF in Butner. Thank you for the chance to express my concerns.

Yours truly,

Lynn Mitchell Kohn

Comment No: 1 Issue Code: 20.3
DHS notes the commentor's concern. 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 need for an evacuation in response to a release, and particularly actions that would affect the special-needs populations of concern, would be a very low probability event. Once the ROD has been signed and prior to the initiation of NBAF operations, a site-specific emergency management plan will be developed that will be coordinated with the local emergency response agencies and will include contingency plans for potentially affected residents and institutions. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the NBAF.

Comment No: 2 Issue Code: 12.3
DHS notes the commentor's water quality concerns and DHS acknowledges the current regional drought conditions. As described in Section 3.7.7.3.1 of the NBAF EIS, the South Granville Water and Sewer Authority has 3 to 4 million gallons per day of excess potable water capacity and could meet NBAF's need of approximately 110,000 gallons per day, currently less than 0.4% of the Authority's total current capacity. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 210 residential homes.

Comment No: 3 Issue Code: 18.3
DHS notes the commentors concern. Section 3.13.2.2 of the NBAF EIS discusses the disposition of sanitary sewer wastes, waste solids, and carcass/pathological wastes generated by the NBAF no matter where the NBAF is located. Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered for animal carcass and pathological waste disposal (i.e., incineration, alkaline hydrolysis, and rendering). As discussed in this section, the final design for the NBAF will probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements.

The final disposition location of the hazardous and municipal waste solids that would be generated by the NBAF depends on many factors including the characteristics of the waste, the waste acceptance criteria of potential receiving facilities, state and local regulations, facility permits, cost, etc. As discussed in Section 3.13.8.3, North Carolina is a net exporter of both municipal solid and hazardous waste. The ability of North Carolina to export municipal solid waste and hazardous waste to other jurisdictions suggests that disposal capacity for solid and hazardous waste is not an issue. In evaluating capacity, local capacity is not relevant because these wastes are shipped across state

lines routinely. It is national capacity that matters as a limiting factor.

Comment No: 4 Issue Code: 19.3

DHS notes the commentor's concern. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the NBAF EIS. The risk of an accidental release of a pathogen is extremely low. 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. Site-specific Standard Operating Procedures (SOP) and response plans would be in place prior to the initiation of research activities at the proposed NBAF. The RVF response plan would include a mosquito control action plan, which could include aerial spraying as a component. DHS would comply with all local, state, and Federal regulations regarding use of any insecticide. The potential consequences of pesticide use would be evaluated during the preparation of a site-specific response plan.

Comment No: 5 Issue Code: 25.3

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

Koller, Margaret

Page 1 of 1

PD0130

August 17, 2008

1| 25.1 My name is Margaret Koller. We live on [redacted], and we would just like to go on record as being very much opposed to the Plum Island upgrade to a Level-4 bio safety.

If there's any questions or if you need anything more than that, my phone number is 631-749 1608.

Thank you.

Comment No: 1 Issue Code: 25.1

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

Krakow, Greg

Page 1 of 1

WD0530

From: GA Krakow [redacted]
Sent: Sunday, August 24, 2008 9:44 PM
To: NBAFProgramManager
Subject: Opposition to NBAF in Athens, Georgia

1| 25.2 I am opposed to locating NBAF in Athens, Georgia. I am united with many of the citizens of Athens to do whatever is necessary to keep NBAF from being built in our community.

Greg Krakow

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

Kramer, Brad

Page 1 of 1

WD0642

From: Brad Kramer [redacted]
Sent: Friday, August 22, 2008 7:14 PM
To: NBAFProgramManager
Subject: Support for NBAF in Kansas

1|24.4 I highly support the location of the NBAF in Manhattan, KS. I believe Kansas is uniquely suited to host the NBAF.

2|8.4
- Kansas is in the agricultural heartland and highly connected to key animal health companies.
- The current Biosecurity Research Institute (BRI) was built on time and for significantly less money than the EIS would have estimated. The facility is state-of-the-art and ready to begin hosting personnel and research upon selection of Manhattan for the NBAF.
- Locating this high security research facility in Kansas provides geographic diversity to the secure biolabs that the federal government already operates.

1Cont.|24.4
- Kansans, from the Governor down to local community and university officials, are highly supportive of the location of NBAF in Manhattan.

Sincerely,

Bradley A. Kramer, Ph.D.
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Comment No: 1 Issue Code: 24.4
DHS notes the commentor's support for the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 8.4
DHS notes the commentor's statement.