

Pitts, John and Kristine

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Aug 15 08 02:14p John & Kristine Pitts [REDACTED] p.1

FD0015

August 15, 2008

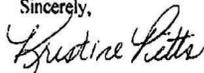
To whom it may concern:

1| 25.5 | I am writing to let you know I completely oppose the bio-lab being built in
 Flora, MS. The risk is too great for a community that is mostly agricultural.
 2| 5.0 | Why waste \$750 Million of taxpayers money to bring something so
 3| 24.1 | potentially disastrous to the mainland of the U.S.? Keep it on Plum Island
 where it belongs and update the facilities there at a much lower cost to the
 taxpayers, not to mention much lower risk of outbreak by having it remain
 there.

4| 15.5 | Please, I implore you not to bring this bio-lab to Flora. If more people knew
 the hazards of having it here, all would most definitely be opposed to it.
 Unfortunately the risks have been kept quiet or downplayed and most
 everyone does not have a clue as to the real danger it imposes. They've been
 5| 21.5 | fed the lies that it will bring progress and jobs to our community, when the
 truth of the matter is it will not be employing or helping anyone here, but
 only putting all of us in danger. Not to mention that it makes us a prime
 target for terrorists to boot.

6| 27.0 | I have attached a summation of articles discussing the different points on
 why we should all oppose having this lab on the mainland. I have marked
 the more important areas to read. Thank you for your time and I hope you'll
 consider my plea not to move it from Plum Island.

Sincerely,


Kristine Pitts
[REDACTED]Comment No: 1 Issue Code: 25.5

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

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 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 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: 3 Issue Code: 24.1

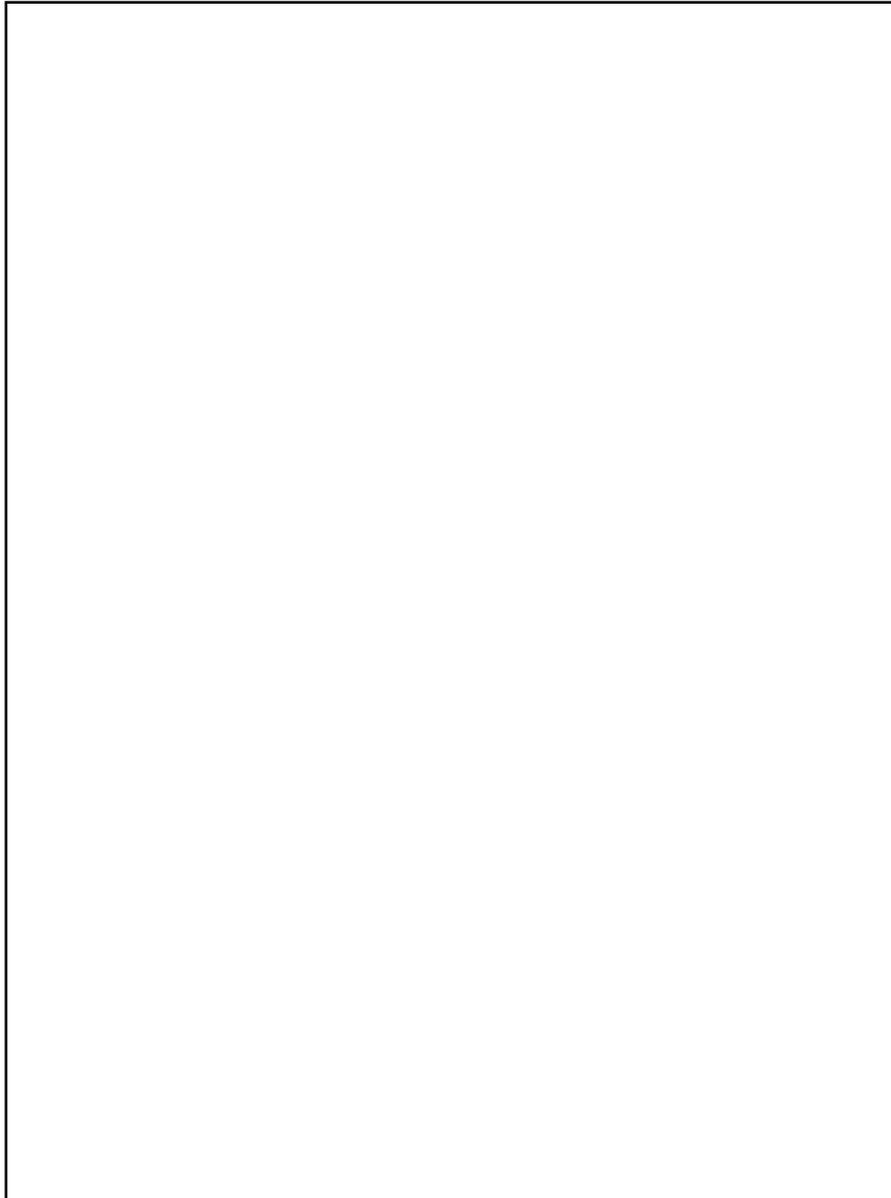
DHS notes the commentor's statement.

Comment No: 4 Issue Code: 15.5

DHS notes the commentor's concerns. The economic effects of the NBAF at the Flora Industrial Park Site are included 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. Section 3.10.5.2 states that the majority of the construction workers would be drawn from the study area or would commute from the surrounding counties. Upon the facility's completion, permanent employees will include scientific and support staff as well as operations, maintenance and security staff. A portion of these jobs are expected to be filled by the local labor force. In addition, household spending by new residents and the operations of the NBAF are expected to create job opportunities in non-specialized areas such as food services and drink establishments and wholesale trade, which would be filled by the local labor force (Section 3.10.5.3).

Comment No: 5 Issue Code: 21.5

DHS notes the commentor's concern that the NBAF would be a prime terrorist target. Section 3.14 addresses accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (designated as For Official Use Only)(TRA) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The 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: 6 Issue Code: 27.0
DHS notes the information provided by the commentor.

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Subject: Dangerous animal virus on US mainland?

Connecticut to fight proposal for defense lab

<http://www.reuters.com/article/latestCrisis/idUSN14342553>

Quote:

BOSTON, Aug 14 (Reuters) - Connecticut will fight a proposal to turn a federal laboratory known as the "Alcatraz for animal disease" into a facility to study deadly viruses, the state's attorney general said on Thursday.

Quote:

The facility would be the only biosafety level 4 animal laboratory in the country and could cost as much as \$750 million to build.

Connecticut Attorney General Richard Blumenthal said the proposed laboratory would make his state **a potential target for terrorists and put human life at risk.**

"Dire public health dangers of leaks or terrorist attacks make this site clearly and completely unacceptable," he said in a statement. His office is preparing formal comments to fight the Department of Homeland Security proposal, he added.

<http://www.courant.com/community/news/mc-plumisland/0814.anaug14.0.6729789.story>

Quote:

Published reports this week said **Flora, Miss., is at the top of the list**, with sites in Athens, Ga.; Manhattan, Kan.; San Antonio, Texas; and Butner, N.C., also being considered.

<http://www.reuters.com/article/latestCrisis/idUSN14342553>

Connecticut to fight proposal for defense lab

Quote:

Plans for the next-generation National Bio and Agro-Defense Facility, slated to go online in 2015, include biosafety labs where scientists in outfits resembling spacesuits would research deadly diseases that can spread to people from animals, including those for which there are no known vaccine.

Quote:

The facility would be the only biosafety level 4 animal laboratory in the country and could cost as much as

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http://www.nhregister.com/site/news.cfm?newsid=20014043&BRD=1281&PAG=461&dept_id=635049&ri=6

Quote:

Department spokeswoman Amy Kudwa said the new facility would build on Plum Island's work with livestock. Other Biosafety Level 4 research facilities exist in the country, she said, but not with the space for handling large animals.

"Basically the kind of research that we do at Plum Island, it's the only facility like it," Kudwa said. "The proposed (National Bio and Agro-Defense Facility) would expand upon and move into the 21st century our research currently conducted at Plum Island."

The new facility would study diseases including foot and mouth disease, classical and African swine fever, contagious bovine pleuropneumonia, and the Nipah and Hendra viruses, according to the department.

Of the six locations under consideration, Kudwa said, Plum Island is the only one with an existing facility. The department is compiling environmental-impact statements for the sites and is planning to make a final decision about the facility's location by the end of the year.

<http://www.courant.com/news/local/hc-ctplumoppose0815.artaug15.0.5256069.story>

Quote:

Attorney General Richard Blumenthal is opposing any plan to locate a new lab that would study some of the world's deadliest biological threats on Plum Island, 8 miles off the Connecticut coast.

Quote:

Blumenthal on Thursday said he opposes locating the new lab on Plum Island, a move that would require raising the existing lab's biosafety level to a designation that would allow researchers there to study "microorganisms that pose a high risk of life-threatening disease and for which there is no known vaccine or therapy."

Quote:

"It should be scary to most informed citizens because it involves diseases that have no known cures or vaccines, some that are very deadly and contagious," Blumenthal said. A level 4 designation also involves a measure of security and secrecy that may prevent citizens from knowing about accidents or leaks at the lab.

<http://www.newsday.com/news/local/longisland/ny-4terr0814b.0.373897.story>

North Fork residents rattled by Plum Island terror tie

Quote:

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The Plum Island Animal Disease Center's inclusion on a list seized from a Pakistani scientist suspected of ~~ED0049~~ has heightened the fears of some North Fork residents who say the facility is still not adequately secure.

Referring to arrested neuroscientist Aafia Siddiqui, Melanie Norden of Greenport said yesterday, "she was a 'distinguished' scientist and might have been able to get to Plum Island as a researcher."

But the Department of Homeland Security and the local congressman say the fears of Norden and other residents are unfounded.

The Government Accountability Office, elected officials, and North Fork residents have questioned security on the island for years.

Feds urged not to build new lab on Plum Island

<http://www.newsday.com/news/local/suffolk/ny-liplum0814.0.2829638.story>

Quote:

On Tuesday night, all but one of the 17 speakers urged DHS not to build NBAF on Plum Island, saying it posed too much of a threat to the local population and wildlife.

The one exception was former lab director Jerry Callis, who said "Plum Island has served as a good site for this facility" and it did not make sense to relocate its scientists.

Former Congresswoman Elizabeth Holtzman, a summer North Fork resident, said that the government's assumption that it could prevent leaks of pathogens from the new lab is "living in a fairyland."

<http://www.ensthamptonstar.com/dnn/Home/News/PlumIsland/tabid/6315/Default.aspx>

Quote:

At Plum Island, a mile and a half off Orient Point, foot-and-mouth (the most contagious animal disease known) has been studied for 50 years. There are 7 types and 80 subtypes, making vaccination difficult. Foot-and-mouth affects cloven-hoofed animals such as cattle, deer, pigs, and sheep. Plum Island is the only facility in the United States currently certified to work with live foot-and-mouth virus. The research center's island location, and the fact there are only small populations of livestock in the area, account for this distinction.

Plum Island's setting is a key element in its favor as officials survey possible locations for the new bioterrorism research center. The federal government's environmental study noted that while level-4 labs are isolated within secure outer buildings, even under the best of circumstances systems can fail.

The study cited three very recent failures including the infection of workers with brucella bacteria at one of Texas A&M University's level-3 laboratories in 2006. Last year, a one-hour power outage at the new level-4 facility of the Centers for Disease Control in Atlanta caused both the main and backup power systems to fail and the negative air-pressure system, which is a major component of pathogen biocontainment, to shut down. (That lab had not yet begun its work with pathogens.) In 2007 there was also a release of foot-and-mouth disease in England due to a damaged and leaking drainage system at a research facility.

Some livestock-industry groups have urged Homeland Security not to move such a facility onto the mainland. In other countries where foot-and-mouth disease is studied, new facilities have been placed or continue to be operated offshore.

http://www.gnlincathens.com/stories/081408/news_2008081400307.shtml

NBAF salaries at top end of local scale

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Homeland Security estimates that 69 of the 326 jobs will go to local residents, with the rest filled by relocating government employees.

<http://www.themercury.com/News/article.aspx?articleid=18b9463a2e554234b66ed410958cf0bed>

Quote:

And Jerry Callas, who identified himself as one of the original Plum Island workers, told DHS officials they would be foolish to move research on foot and mouth disease — a main preoccupation of Plum Island at present — onto the mainland in a combined facility.

"FMD is one of the most elusive viruses known," he said. "I cannot conceive of it being moved to North Carolina, Georgia, Mississippi, Kansas or Texas."

Some of the opponents appeared to be operating out of a simple and deep suspicion of the government. Elizabeth Holtzman, an area resident and former congresswoman who in the 1970s sat on the House committee that impeached President Nixon, openly questioned whether DHS could mount a reasonable defense against such problems as rogue scientists. Citing recent developments in the 2002 anthrax case, Holtzman challenged "anyone to say the risk is negligible."

As we saw in England, everything is destroyed within several miles from ground zero. If the government only thinks the virus might be somewhere it proceeds to destroy every living animal. This is NOT good. And LOOK at the locations they mention...all known agricultural centers with a high animal population.

Dangerous animal virus on US mainland?

By LARRY MARGASAK, Associated Press Writer Fri, Apr 11, 8:34 AM ET

WASHINGTON - The Bush administration is likely to move its research on one of the most contagious animal diseases from an isolated island laboratory to the U.S. mainland near herds of livestock, raising concerns about a catastrophic outbreak.

Skeptical Democrats in Congress are demanding to see internal documents they believe highlight the risks and consequences of the decision. An epidemic of the disease, foot and mouth, which only affects animals, could devastate the livestock industry.

One such government report, produced last year and already turned over to lawmakers by the Homeland Security Department, combined commercial satellite images and federal farm data to show the proximity to livestock herds of locations that have been considered for the new lab. "Would an accidental laboratory release at these locations have the potential to affect nearby livestock?" asked the nine-page document. It did not directly answer the question

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A simulated outbreak of the disease — part of an earlier U.S. government exercise called "Crimson Sky" ended with fictional riots in the streets after the simulation's National Guardsmen were ordered to kill tens of millions of farm animals, so many that troops ran out of bullets. In the exercise, the government said it would have been forced to dig a ditch in Kansas 25 miles long to bury carcasses. In the simulation, protests broke out in some cities amid food shortages.

"It was a mess," said Sen. Pat Roberts, R-Kan., who portrayed the president in the 2002 exercise. Now, like other lawmakers from the states under consideration, Roberts supports moving the government's new lab to his state. Manhattan, Kan., is one of five mainland locations under consideration. "It will mean jobs" and spur research and development, he says.

The other possible locations for the new National Bio-and Agro-Defense Facility are Athens, Ga.; Butler, N.C.; San Antonio, and Flora, Miss. The new site could be selected later this year, and the lab would open by 2014. The numbers of livestock in the counties and surrounding areas of the finalists range from 542,507 in Kansas to 132,900 in Georgia, according to the Homeland Security study.

Foot-and-mouth virus can be carried on a worker's breath or clothes, or vehicles leaving a lab, and is so contagious it has been confined to Plum Island, N.Y., for more than a half-century — far from commercial livestock. The existing lab is 100 miles northeast of New York City in the Long Island Sound, accessible only by ferry or helicopter. Researchers there who work with the live virus are not permitted to own animals at home that would be susceptible, and they must wait at least a week before attending outside events where such animals might perform, such as a circus.

The White House says modern safety rules at labs are sufficient to avoid any outbreak. But incidents in Britain have demonstrated that the foot-and-mouth virus can cause remarkable economic havoc — and that the virus can escape from a facility.

An epidemic in 2001 devastated Britain's livestock industry, as the government slaughtered 6 million sheep, cows and pigs. Last year, in a less serious outbreak, Britain's health and safety agency concluded the virus probably escaped from a site shared by a government research center and a vaccine maker. Other outbreaks have occurred in Taiwan in 1997 and China last year and in 2006.

If even a single cow signals an outbreak in the U.S., emergency plans permit the government to shut down all exports and movement of livestock. Herds would be quarantined, and a controlled slaughter could be started to stop the disease from spreading.

Infected animals weaken and lose weight. Milk cows don't produce milk. They remain highly infectious, even if they survive the virus.

The Homeland Security Department is convinced it can safely operate the lab on the mainland, saying containment procedures at high-security labs have improved. The livestock industry is divided. Some experts, including the former director at the aging Plum Island Animal Disease Center, say research ought to be kept away from cattle populations — and, ideally, placed where the public already has accepted dangerous research.

The former director, Dr. Roger Breeze, suggested the facility could be safely located at the Atlanta campus of the Centers for Disease Control and Prevention, or at Fort Detrick in Frederick, Md., home of The United States Army Medical Research Institute for infectious diseases.

Another possibility, Breeze said, is on Long Island, where there is no commercial livestock industry. That would allow retention of most of the current Plum Island employees.

Asked about the administration's finalist sites located near livestock, Breeze said: "It seems a little odd. It goes

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against the ... safety program of the last 50 years."

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The former head of the U.S. Agriculture Department's Agricultural Research Service said Americans are not prepared for a foot-and-mouth outbreak that has been avoided on the mainland since 1929.

"The horrific prospect of exterminating potentially millions of animals is not something this country's ready for," said Dr. Floyd Horn.

The Agriculture Department ran the Plum Island lab until 2003. It was turned over to the Homeland Security Department because preventing an outbreak is now part of the nation's biological defense program.

Plum Island researchers work on detection of the disease, strategies to control epidemics including vaccines and drugs, tests of imported animals to ensure they are free of the virus and training of professionals.

The new facility will add research on diseases that can be transferred from animals to humans. The Plum Island facility is not secure enough to handle that higher-level research.

Leaders of the House Energy and Commerce Committee also are worried about the lab's likely move to the mainland. The chairman, Rep. John Dingell, D-Mich., and the head of the investigations subcommittee, Rep. Bart Stupak, D-Mich., are threatening to subpoena records they say Homeland Security is withholding from Congress. Those records include reports about "Crimson Sky," an internal review about a publicized 1978 accidental release of foot-and-mouth disease on Plum Island and reports about any previously undisclosed virus releases on the island during the past half century.

The lawmakers set a deadline of Friday for the administration to turn over reports they requested. Otherwise, they warned in a letter to Homeland Security Secretary Michael Chertoff, they will arrange a vote next week to issue a congressional subpoena.

A new facility at Plum Island is technically a possibility. Signs point to a mainland site, however, after the administration spent considerable time and money scouting new locations. Also, there are financial concerns about operating from a location accessible only by ferry or helicopter.

The Homeland Security Department says laboratory animals would not be corralled outside the new facility, and they would not come into contact with local livestock. All work with the virus and lab waste would be handled securely and any material leaving would be treated and monitored to ensure it was sterilized.

"Containment technology has improved dramatically since foot-and-mouth disease prohibitions were put in place in 1948," Homeland Security spokeswoman Amy Kudwa said.

Cattle farmers and residents are divided over the proposal to move the lab to the mainland.

"I would like to believe we could build a facility, with the knowledge and technology we have available, that would be basically safe from a bio-security standpoint," said John Stuedemann, a cattle farmer near Athens, Ga., and a former scientist at the Agriculture Department.

Nearby, community activist Grady Thrasher in Athens is worried about an outbreak from a research lab. Thrasher, a former securities lawyer, has started a petition drive against moving the lab to Georgia, saying the risks are too great.

"There's no way you can balance that equation by putting this in the middle of a community where it will do the most harm," Thrasher said. "The community is now aroused, so I think we have a majority against this."

In North Carolina, commissioners in Granville County originally endorsed moving the lab to their area but later

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withdrew support. Officials from Homeland Security ultimately met with residents for more than four hours, but the commissioners have taken no further action to back the facility. FD0015

"Accidents are going to happen 50 years down the road or one year down the road," said Bill McKellar, a pharmacist in Butner, N.C., who leads an opposition group that has formed a research committee of lawyers and doctors.

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WD0517

From: Firehouse Moustache Wax [REDACTED]
Sent: Thursday, August 21, 2008 9:23 PM
To: NBAFProgramManager
Subject: My thoughts on the Bio-lab in Flora

To whom it may concern:

1| 5.0 | This is a letter I sent out to friends, family and state officials concerning my thoughts on
 2| 25.5 | the bio-lab being brought to Flora...or any part of the mainland for that matter. Please
 know that it is not welcome here by many of us that are trying to get our voices heard.

Thank you for your time.
 John Pitts

Hello Folks,

3| 27.0 | Some of you that will get this know me and some will not. This is just a small letter showing my
BIG opposition to the bio-hazard lab that is apparently coming to Flora, MS. Why does it look
 like it's coming to Flora? Because most people do not know the whole story. They do not know
 the real risks this place could have not only to the city of Flora, but Madison County and Central
 Mississippi as well. The citizens of the other proposed sites all protested having this lab put in
 their communities due to the risks of having it. Below is the first of two articles I'm sending that
 the citizens of Madison County did not get to see or hear. It helps explain why no one else
 wanted this lab in their communities.

If Homeland Security thinks they need a new lab, why don't they renovate the existing one on
 Plum Island? It will cost the taxpayers \$750 Million to build a new site and to renovate the
 existing one would be significantly less and financially smarter. Keep it on Plum Island where it
 belongs and update the facilities there at a much lower cost to the taxpayers, not to mention
 much lower risk by having it remain there on an isolated island.

That makes me think of something else. They say this will bring in lots of jobs for our area. If
 one looks at the actual figures, only 69 of 326 jobs will go to local residents. The remaining 257
 jobs will go to relocating government employees. And guess who will be paying to relocate all
 those employees? You guessed it. You and me... on top of the \$750 Million we'll be footing for
 the new site.

It has also amazed me that this has been kept hush hush for so long from the public. This has
 been in the works a long time by government officials and some local people. I would imagine
 that it's because they were scared they would get too much opposition if the citizens found out
 the real facts, like they did in the other proposed areas to have the site. I think some people here
 are for it because they have land that can be sold for a pretty penny around the Flora area. Others
 see it as a means for development and making money. As usual, it all comes down to money.

As for the Flora area, why do we feel the need to try and make it grow? It is already a wonderful

Comment No: 1 Issue Code: 5.0

DHS notes the commentor's opposition to the five mainland site alternatives including the Flora
 Industrial Park Site Alternative.

Comment No: 2 Issue Code: 25.5

DHS notes the commentor's statement.

Comment No: 3 Issue Code: 27.0

DHS notes the information provided by the commentor.

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area with wonderful people. What's wrong with keeping Flora the way it is?

This was not written to make anyone mad. I am just stating what I think and that I'm not the only one opposing it. Others I know are opposing it too now that they're getting the facts about it. But many I know are for it as well. And some are my friends. This letter and the following articles are simply to show that not everyone is happy about this lab. I want to mention to Mr. Scott (the Mayor of Flora) that you are doing a great job and when we talk I can always tell you have great concern for the people of Flora. I hope you'll take our concerns into consideration.

Thanks folks for taking the time to read this. Below is the first article with another to follow. If you don't want to read it all, please just read the highlighted print so you'll see why we have great reason for concern with locating the lab in Flora.

Everyone be safe.
John Pitts

Subject: Dangerous animal virus on US mainland?

3| 27.0

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3 cont.] 27.0

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The White House says modern safety rules at labs are sufficient to avoid any outbreak. **But incidents in Britain have demonstrated that the foot-and-mouth virus can cause remarkable economic havoc — and that the virus can escape from a facility.**

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The former director, Dr. Roger Breeze, suggested the facility could be safely located at the Atlanta campus of the Centers for Disease Control and Prevention, or at Fort Detrick in Frederick, Md., home of The United States Army Medical Research Institute for infectious diseases.

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3 cont. | 27.0

Another possibility, Breeze said, is on Long Island, where there is no commercial livestock industry. That would allow retention of most of the current Plum Island employees.

Asked about the administration's finalist sites located near livestock, Breeze said: "It seems a little odd. It goes against the ... safety program of the last 50 years."

The former head of the U.S. Agriculture Department's Agricultural Research Service said Americans are not prepared for a foot-and-mouth outbreak that has been avoided on the mainland since 1929.

"The horrific prospect of exterminating potentially millions of animals is not something this country's ready for," said Dr. Floyd Horn.

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Leaders of the House Energy and Commerce Committee also are worried about the lab's likely move to the mainland. The chairman, Rep. John Dingell, D-Mich., and the head of the investigations subcommittee, Rep. Bart Stupak, D-Mich., are threatening to subpoena records they say Homeland Security is withholding from Congress. Those records include reports about "Crimson Sky," an internal review about a publicized 1978 accidental release of foot-and-mouth disease on Plum Island and reports about any previously undisclosed virus releases on the island during the past half century.

The lawmakers set a deadline of Friday for the administration to turn over reports they requested. Otherwise, they warned in a letter to Homeland Security Secretary Michael Chertoff, they will arrange a vote next week to issue a congressional subpoena.

A new facility at Plum Island is technically a possibility. Signs point to a mainland site, however, after the administration spent considerable time and money scouting new locations. Also, there are financial concerns about operating from a location accessible only by ferry or helicopter.

The Homeland Security Department says laboratory animals would not be corralled outside the new facility, and they would not come into contact with local livestock. All work with the virus and lab waste would be handled securely and any material leaving would be treated and monitored to ensure it was sterilized.

"Containment technology has improved dramatically since foot-and-mouth disease prohibitions were put in place in 1948," Homeland Security spokeswoman Amy Kudwa said.

Cattle farmers and residents are divided over the proposal to move the lab to the mainland.

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3 cont. | 27.0

"I would like to believe we could build a facility, with the knowledge and technology we have available, that would be basically safe from a bio-security standpoint," said John Stuedemann, a cattle farmer near Athens, Ga., and a former scientist at the Agriculture Department.

Nearby, community activist Grady Thrasher in Athens is worried about an outbreak from a research lab. Thrasher, a former securities lawyer, has started a petition drive against moving the lab to Georgia, saying the risks are too great.

"There's no way you can balance that equation by putting this in the middle of a community where it will do the most harm," Thrasher said. "The community is now aroused, so I think we have a majority against this."

In North Carolina, commissioners in Granville County originally endorsed moving the lab to their area but later withdrew support. Officials from Homeland Security ultimately met with residents for more than four hours, but the commissioners have taken no further action to back the facility.

"Accidents are going to happen 50 years down the road or one year down the road," said Bill McKellar, a pharmacist in Butner, N.C., who leads an opposition group that has formed a research committee of lawyers and doctors.

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From: Firehouse Moustache Wax [REDACTED]
 Sent: Thursday, August 21, 2008 9:24 PM
 To: NBAFProgramManager
 Subject: More info. on bio-lab

1| 27.0 | Additional quotes and articles concerning the biolab and the safety of those in the communities surrounding it.
 | John Pitts

Connecticut to fight proposal for defense lab

<http://www.reuters.com/article/latestCrisis/idUSN14342553>

Quote:

BOSTON, Aug 14 (Reuters) - Connecticut will fight a proposal to turn a federal laboratory known as the "Alcatraz for animal disease" into a facility to study deadly viruses, the state's attorney general said on Thursday.

Quote:

The facility would be the only biosafety level 4 animal laboratory in the country and could cost as much as **\$750 million** to build.

Connecticut Attorney General Richard Blumenthal said the proposed laboratory would make his state **a potential target for terrorists and put human life at risk**.

"Dire public health dangers of leaks or terrorist attacks make this site clearly and completely unacceptable," he said in a statement. His office is preparing formal comments to fight the Department of Homeland Security proposal, he added.

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<http://www.courant.com/community/news/mr/hc-plumisland0814.artaug14.0.6729789.story>

Quote:

Published reports this week said **Flora, Miss., is at the top of the list**, with sites in Athens, Ga.; Manhattan, Kan.; San Antonio, Texas; and Butner, N.C., also being considered.

=====
<http://www.reuters.com/article/latestCrisis/idUSN14342553>

Connecticut to fight proposal for defense lab

Comment No: 1

Issue Code: 27.0

DHS notes the information provided by the commentor.

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Quote:

Plans for the next-generation National Bio and Agro-Defense Facility, slated to go online in 2015, include biosafety labs where scientists in outfits resembling spacesuits would research deadly diseases that can spread to people from animals, including those for which there are no known vaccine.

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The facility **would be the only biosafety level 4 animal laboratory in the country** and could cost as much as \$750 million to build.

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Connecticut will fight a proposal to turn a federal laboratory known as the "Alcatraz for animal disease" into a facility to study deadly viruses, the state's attorney general said on Thursday.

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[http://www.nhregister.com/site/news.cfm?
newsid=20014043&BRD=1281&PAG=461&dept_id=635049&rfti=6](http://www.nhregister.com/site/news.cfm?newsid=20014043&BRD=1281&PAG=461&dept_id=635049&rfti=6)

Quote:

Department spokeswoman Amy Kudwa said the new facility would build on Plum Island's work with livestock. Other Biosafety Level 4 research facilities exist in the country, she said, but not with the space for handling large animals.

"Basically the kind of research that we do at Plum Island, it's the only facility like it," Kudwa said. "The proposed (National Bio and Agro-Defense Facility) would expand upon and move into the 21st century our research currently conducted at Plum Island."

The new facility would study diseases including foot and mouth disease, classical and African swine fever, contagious bovine pleuropneumonia, and the Nipah and Hendra viruses, according to the department.

Of the six locations under consideration, Kudwa said, Plum Island is the only one with an existing facility. The department is compiling environmental-impact statements for the sites and is planning to make a final decision about the facility's location by the end of the year.

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<http://www.courant.com/news/local/hc-ctplumoppose0815.artaug15.0.5256969.story>

Quote:

[Attorney General Richard Blumenthal is opposing any plan to locate a new lab that would study some of the world's deadliest biological threats on Plum Island, 8 miles off the Connecticut coast.](#)

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Quote:

Blumenthal on Thursday said he opposes locating the new lab on Plum Island, a move that would require raising the existing lab's biosafety level to a designation that would allow researchers there to study "microorganisms that pose a high risk of life-threatening disease and for which there is no known vaccine or therapy."

Quote:

"It should be scary to most informed citizens because it involves diseases that have no known cures or vaccines, some that are very deadly and contagious," Blumenthal said. A level 4 designation also involves a measure of security and secrecy that may prevent citizens from knowing about accidents or leaks at the lab.

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<http://www.newsday.com/news/local/longisland/ny-literr0814b.0.373897.story>

North Fork residents rattled by Plum Island terror tie**Quote:**

The Plum Island Animal Disease Center's inclusion on a list seized from a Pakistani scientist suspected of terrorism has heightened the fears of some North Fork residents who say the facility is still not adequately secure.

Referring to arrested neuroscientist Aafia Siddiqui, Melanie Norden of Greenport said yesterday, "she was a 'distinguished' scientist and might have been able to get to Plum Island as a researcher."

But the Department of Homeland Security and the local congressman say the fears of Norden and other residents are unfounded.

The Government Accountability Office, elected officials, and North Fork residents have questioned security on the island for years.

Feds urged not to build new lab on Plum Island

=====
<http://www.newsday.com/news/local/suffolk/ny-liplum0814.0.2829638.story>

Quote:

On Tuesday night, all but one of the 17 speakers urged DHS not to build NBAF on Plum Island, saying it posed too much of a threat to the local population and wildlife.

The one exception was former lab director Jerry Callis, who said "Plum Island has served as a good site for this facility" and it did not make sense to relocate its scientists.

Former Congresswoman Elizabeth Holtzman, a summer North Fork resident, said that the government's assumption that it could prevent leaks of pathogens from the new lab is "living in a fairyland."

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<http://www.easthamptonstar.com/dnn/Home/News/PlumIsland/tabid/6315/Default.aspx>

Quote:

At Plum Island, a mile and a half off Orient Point, foot-and-mouth (the most contagious animal disease known) has been studied for 50 years. There are 7 types and 80 subtypes, making vaccination difficult. Foot-and-mouth affects cloven-hoofed animals such as cattle, deer, pigs, and sheep. Plum Island is the only facility in the United States currently certified to work with live foot-and-mouth virus. The research center's island location, and the fact there there are only small populations of livestock in the area, account for this distinction.

Plum Island's setting is a key element in its favor as officials survey possible locations for the new bioterrorism research center. The federal government's environmental study noted that while level-4 labs are isolated within secure outer buildings, even under the best of circumstances systems can fail.

The study cited three very recent failures including the infection of workers with brucella bacteria at one of Texas A&M University's level-3 laboratories in 2006. Last year, a one-hour power outage at the new level-4 facility of the Centers for Disease Control in Atlanta caused both the main and backup power systems to fail and the negative air-pressure system, which is a major component of pathogen biocontainment, to shut down. (That lab had not yet begun its work with pathogens.) In 2007 there was also a release of foot-and-mouth disease in England due to a damaged and leaking drainage system at a research facility.

Some livestock-industry groups have urged Homeland Security not to move such a facility onto the mainland. In other countries where foot-and-mouth disease is studied, new facilities have been placed or continue to be operated offshore.

=====
http://www.onlineathens.com/stories/081408/news_2008081400307.shtml

NBAF salaries at top end of local scale

Quote:

Homeland Security estimates that **69 of the 326 jobs will go to local residents, with the rest filled by relocating government employees.**

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<http://www.themercury.com/News/article.aspx?articleId=18b9463a2e554234b0ed410958cf0bed>

Quote:

And **Jerry Callas, who identified himself as one of the original Plum Island workers**, told DHS officials they would be foolish to move research on foot and mouth disease — a main preoccupation of Plum Island at present — onto the mainland in a combined facility.

"FMD is one of the most elusive viruses known," he said. "I cannot conceive of it being moved to North Carolina, Georgia, Mississippi, Kansas or Texas."

Some of the opponents appeared to be operating out of a simple and deep suspicion of the government. Elizabeth Holtzman, an area resident and former congresswoman who in the 1970s sat on the House committee that impeached President Nixon, openly questioned whether DHS could mount a reasonable defense against such problems as rogue scientists.

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Citing recent developments in the 2002 anthrax case, Holtzman challenged "anyone to say the risk is negligible."

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Connecticut to fight proposal for defense lab

Thu Aug 14, 2008 5:29pm EDT

BOSTON, Aug 14 (Reuters) - Connecticut will fight a proposal to turn a federal laboratory known as the "Alcatraz for animal disease" into a facility to study deadly viruses, the state's attorney general said on Thursday.

New York's Plum Island is one of six potential sites for a new facility that would study lethal diseases transmitted by animals along with biological agents that could harm food supplies.

The facility would be the only biosafety level 4 animal laboratory in the country and could cost as much as \$750 million to build.

Connecticut Attorney General Richard Blumenthal said the proposed laboratory would make his state a potential target for terrorists and put human life at risk.

"Dire public health dangers of leaks or terrorist attacks make this site clearly and completely unacceptable," he said in a statement. His office is preparing formal comments to fight the Department of Homeland Security proposal, he added.

Plum Island is two miles (3 km) off the eastern tip of New York's Long Island and about 8 miles (13 km) south of Connecticut's southern coast.

Plans for the next-generation National Bio and Agro-Defense Facility, slated to go online in 2015, include biosafety labs where scientists in outfits resembling spacesuits would research deadly diseases that can spread to people from animals, including those for which there are no known vaccine.

There are four labs that run at biosafety level 4, which calls for multiple safeguards while handling high-risk disease organisms -- in Atlanta, the Washington suburbs, and in Galveston and San Antonio, Texas. By comparison, a college chemistry lab could be level 1.

For more than half a century, the Plum Island Animal Disease Center, a level 3 lab, has been the only federal lab permitted to conduct research on live foot-and-mouth disease viruses that can spread rapidly through livestock.

The 840-acre (340-hectare) island is sometimes called the Alcatraz for animal disease because research there is done in isolation, similar to the way criminals were isolated in the now-closed Alcatraz island penitentiary in San Francisco Bay.

Other possible sites for the proposed laboratory are Athens, Georgia; Manhattan, Kansas; Flora, Mississippi; Butner, North Carolina; and San Antonio, Texas. A decision is expected later this year. (Reporting by Jason Szep; Editing by Philip Barbara) (jason.szep@thomsonreuters.com; +1-617-367-4142; Reuters Messaging: jason.szep.reuters.com@reuters.net)

Possible Plum Island Upgrade Worries Some Shoreline Residents

By ALAINE GRIFFIN | Courant Staff Writer
August 14, 2008

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Plum Island, off the northern shore of Long Island, N.Y., is seen in an aerial file photo. (AP PHOTO / USDA-ARS, FILE / November 19, 1999)

Despite reports this week that the federal government is looking at Mississippi as its pick for a facility to study some of the world's most deadly biological threats, some shoreline residents wary of research conducted on Plum Island in [Long Island Sound](#) are concerned that the lab could still be built 8 miles off the Connecticut coast.

Five mainland locations are on the U.S. Department of Homeland Security list to house the new laboratory. Federal officials expect to pick a site by the end of the year.

Published reports this week said Flora, Miss., is at the top of the list, with sites in Athens, Ga.; Manhattan, Kan.; San Antonio, Texas; and Butner, N.C., also being considered.

Homeland Security began looking for an alternative site to Plum Island two years ago because estimates showed it would cost more than \$750 million to build a new, more secure lab on the 840-acre island. Officials have said a new lab could be built on the mainland for about \$500 million, and it would be less expensive to run.

A plan to expand the existing Plum Island facility, however, is still on the table, Department of Homeland Security spokeswoman Amy Kudwa said this week. Informational meetings about the plan were held recently in Old Saybrook and in Greenport, N.Y. The lab is just off the north fork on the eastern tip of [Long Island](#).

For shoreline residents like Nancy Czarzasty of Old Saybrook, the meeting resurrected long-standing safety concerns some locals have about living near a facility where highly contagious animal diseases are researched.

What is most distressing, Czarzasty said, is that the facility would become what is called a "biosafety level four" lab if the Plum Island Animal Disease Center is upgraded to the proposed National Bio and Agro-Defense Facility.

Kudwa said the Plum Island facility is now classified as a biosafety level three lab. Going up to level four would allow

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scientists to study "diseases that don't have a cure," Kudwa said. Viruses that are potentially lethal to humans could also be probed with the new biosafety level in place.

"I am concerned about the safety of modernizing Plum Island into a biosafety level four facility [that] would increase its research to include infectious agents that can be transmitted or shared by human and animals — and their human health effects," Czarzasty said. Currently, the facility only studies animal to animal pathogens, Czarzasty said.

Czarzasty has written letters to Gov. M. [Jodi Rell](#) and other state politicians opposing the upgrade, and she is urging residents to contact Homeland Security about their concerns. The meeting in Old Saybrook was poorly attended; she said many locals were not aware a meeting was taking place.

Kudwa said the meeting was advertised in local newspapers and that local leaders were contacted. She said the public can submit comments in writing or via the Internet to the Department of Homeland Security by Aug. 25.

The U.S. Army first set up a laboratory on Plum Island in the 1950s to conduct research into biological warfare. In 1954, the Department of Agriculture moved in to study foreign animal diseases that could harm America or diseases that enemies could use to damage the food supply.

Connecticut residents have objected to laboratory upgrades at Plum Island in the past, fearing that lethal viruses would somehow escape onto the mainland. In response, the facility has held public tours on which disease experts educated visitors about safety and security measures at the site. An extensive website about the lab also addresses safety issues.

The government's search for a new site has sparked protests and applause in other states. Politicians vying for the lab say they're excited about the job and economic development prospects for their regions.

Old Saybrook Selectman Bill Pease said the closing of Plum Island would have a negative impact on Connecticut's economy, resulting in an estimated loss of "150 good-paying jobs."

Kudwa said that even if a new lab is built elsewhere, the Plum Island lab would continue to operate at some level until about 2015.

Pease said the research at Plum Island is vital to the safety of the world's food supply. He's convinced the lab is safe and secure.

"There's a real gap between fact and fiction," Pease said, recalling persistent rumors and suspicion from even close friends that the lab is linked to such outbreaks as West Nile virus and Lyme disease. He said "Plum Island," [Nelson DeMille's](#) novel about the fictitious murders of a husband-wife team of researchers and the theft of a genetically altered virus from the laboratory, added to what he said are myths about the facility.

To get his own answers, Pease said he took a tour of the island a few years ago.

"They made us take showers," Pease said. "You clean your nose and nails like you never cleaned them before."

Contact Alaine Griffin at agriffin@courant.com.

Blumenthal Opposes Upgrading Plum Island Biolab Facility

By ALAINE GRIFFIN | Courant Staff Writer
August 15, 2008

Attorney General [Richard Blumenthal](#) is opposing any plan to locate a new lab that would study some of the world's deadliest biological threats on Plum Island, 8 miles off the Connecticut coast.

Five mainland locations are on the U.S. Department of Homeland Security list to house the proposed National Bio and Agro-Defense Facility. Expanding the existing Plum Island Animal Disease Center to meet the needs of the new facility is still a possibility, despite an Associated Press report that a site in [Mississippi](#) is at the top of the government's list. A site is expected to be chosen by the end of the year.

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Blumenthal on Thursday said he opposes locating the new lab on Plum Island, a move that would require raising the existing lab's biosafety level to a designation that would allow researchers there to study "microorganisms that pose a high risk of life-threatening disease and for which there is no known vaccine or therapy."

The Plum Island facility is now classified as a biosafety level 3 lab that involves the study of animal-to-animal pathogens. A "4" designation allows scientists to research more deadly diseases that can be spread to humans.

"It should be scary to most informed citizens because it involves diseases that have no known cures or vaccines, some that are very deadly and contagious," Blumenthal said. A level 4 designation also involves a measure of security and secrecy that may prevent citizens from knowing about accidents or leaks at the lab.

Blumenthal said he understands the need for secrecy for some sensitive research. "But do we want it in the middle of an area where there is very dense population, recreational use, commercial navigation, not to mention towns and cities within 8 miles on the Connecticut side and even closer to [New York](#)?" Blumenthal asked.

Blumenthal added that, in an effort to diminish costs of running the lab, local police and fire departments may be required to pay the bills if they are called to handle any lab-related emergencies.

"Islands can be protected from terrorist attacks, but the cost of doing so can be very high," Blumenthal said.

Blumenthal said he plans to file formal comments on the draft environmental impact statement, pushing for the lab to be located elsewhere. He also plans to work with the New York attorney general on the matter. If necessary, Blumenthal said his office would take legal action.

"We have rights in court under environmental impact laws," Blumenthal said.

Connecticut residents have objected to laboratory upgrades at Plum Island in the past, fearing that lethal viruses could escape onto the mainland. But scientists and officials associated with the lab have maintained for years that the lab is safe and secure.

Homeland Security began looking for an alternative site to the Plum Island facility two years ago because estimates showed it would cost more than \$750 million to build a new, more secure lab on the 840-acre island. Officials have said a new lab could be built on the mainland for about \$500 million, and it would be cheaper to run.

The five other sites on the government's list are Flora, Miss; Athens, Ga.; [Manhattan](#), Kan.; San Antonio, [Texas](#); and Butner, [N.C.](#) Some elected leaders in those states are trying to lure the lab to their regions, saying it would bring jobs and ties to research centers. The proposed lab is also sparking opposition from residents and local leaders in those states.

Contact Alaine Griffin at agriffin@courant.com.

North Fork residents rattled by Plum Island terror tie

BY BILL BLEYER | bill.bleyer@newsday.com
9:29 PM EDT, August 13, 2008

The Plum Island Animal Disease Center's inclusion on a list seized from a Pakistani scientist suspected of terrorism has heightened the fears of some [North Fork](#) residents who say the facility is still not adequately secure.

Referring to arrested neuroscientist Aafia Siddiqui, Melanie Norden of Greenport said yesterday, "she was a 'distinguished' scientist and might have been able to get to Plum Island as a researcher."

But the Department of Homeland Security and the local congressman say the fears of Norden and other residents are unfounded.

The Government Accountability Office, elected officials and North Fork residents have questioned security on the island for years.

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The GAO said in December that six of 24 security measures recommended in a report four years earlier had not been implemented at the facility where contagious foreign animal diseases are studied. The report said there were still security shortcomings, such as a lack of a policy providing background checks for contractors and visitors, and a need for more exercises with Southold police.

"We have a posture of continual evaluation," Homeland Security spokeswoman Amy Kudwa said.

She added that Plum Island has "numerous fixed and movable cameras. We do have 24/7 security guards on full-island and perimeter patrols with both the Federal Protective Service and private contract security. There are alarmed doors and key card access. We also conduct background checks on both visitors and employees."

There are also support agreements with local law enforcement, she said, and the Coast Guard also monitors surrounding waters. She said a drill was recently held with Southold police and other agencies. Kudwa said action has been taken on the remaining six recommendations from the GAO.

"In my opinion, security on Plum Island right now is adequate," said Rep. [Tim Bishop](#) (D-Southampton). After the GAO report, "security got beefed up."

Feds urged not to build new lab on Plum Island

BY BILL BLEYER | bill.bleyer@newsday.com
7:36 PM EDT, August 13, 2008

The Department of Homeland Security has ruled out keeping the Plum Island Animal Disease Center open to continue its current research if a proposed National Bio and Agro-Defense Facility is built in another state.

Until now, the agency has maintained it might keep the Plum Island facility going even if NBAF opened elsewhere in 2015, although the prospects were considered slim.

But following a hearing in Greenport Tuesday, DHS spokeswoman Amy Kudwa said at least as far back as last fall "our general position has been that we intend to operate a single integrated facility."

"It does not make sense costwise or research collaboration-wise to have separate facilities," said Kudwa, adding the position has been spelled out in reports available to the public.

Rep. Tim Bishop (D-Southampton) said that Homeland Security Secretary Michael Chertoff, in a meeting about Plum Island three years ago with him and Sen. Hillary Rodham Clinton (D-N.Y.), "indicated to us that keeping it open as a BSL-3 facility ... was an option."

NBAF would be a Bio-Safety Level-4 facility, the most secure, to handle diseases that can be passed from animals to humans. Plum Island does not study those type of diseases.

Bishop said he had not been told that Homeland Security's position had changed. He said Kudwa's statement "represents the current position of this administration, and this administration has five more months."

As to why the current lab should keep operating in addition to NBAF, Bishop said, "there's a \$60 million investment going on right now on Plum Island" to upgrade facilities until NBAF is operational.

Clinton said Plum Island should continue its current work because it "plays a critical role in protecting the health and security of our nation's food supply and is important to the economy of surrounding communities."

On Tuesday night, all but one of the 17 speakers urged DHS not to build NBAF on Plum Island, saying it posed too much of a threat to the local population and wildlife.

The one exception was former lab director Jerry Callis, who said "Plum Island has served as a good site for this facility" and it did not make sense to relocate its scientists.

Former Congresswoman Elizabeth Holtzman, a summer North Fork resident, said that the government's assumption that it could prevent leaks of pathogens from the new lab is "living in a fairyland."

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Plum Island May Not Get Nod

By Jennifer Landes

(8/14/2008) The federal government's environmental assessment of whether or not Plum Island Animal Disease Center is a suitable site for a planned new facility devoted to the study of biological terrorism – specifically, diseases communicable to both animals and humans – was vetted on Tuesday night in Greenport. However, Department of Homeland Security representatives said in interviews that while the island is a candidate, it is not likely to be chosen.

Elected officials have requested that Plum Island be allowed to continue its current research after the new biological terrorism facility is built, but it does not appear that Homeland Security will take those requests seriously.

"Do we think it's a good option" for the National Bio and Agro Defense Facility? "Not really," said John Verrico, a science and technology spokesman for the department.

Eugene Cole, a Homeland Security architect who is overseeing the design and construction process, said the additional cost of building the facility on Plum Island, \$750 million versus \$500 million for other sites under consideration, and the remoteness of the island in general were strong factors against it. Still, Mr. Cole noted, "Every site has its challenges."

Plum Island is being examined along with proposed sites in Georgia, Kansas, Mississippi, North Carolina, and Texas. The planned new facility would – along with examining those diseases already studied at Plum Island, including foot-and-mouth disease and swine fever – study additional disease with a Biosafety Level 3 rating, including African swine fever, Rift Valley fever, contagious bovine pleuropneumonia, and Japanese encephalitis. Of those, Rift Valley fever and Japanese encephalitis can affect humans. With its higher Biosafety Level 4 rating, however, the new facility would also conduct research into life-threatening diseases that can be transferred to humans for which there is no known cure. These include nipah and hendra viruses.

Biosafety Level 4 is the highest security rating a lab can be granted. The study of level-4 diseases necessitates increased precautions, including restricted access and placement of the labs in a strictly controlled and isolated inner area within another building.

Mr. Verrico said that the outer building in which a level-4 building is housed must be rated level 3, and that maintaining two facilities with that rating for large-animal study would be costly and redundant, which is why Plum Island (which already is certified level 3) would be decommissioned once the new facility was built.

Representative Tim Bishop said that the "public confirmation that Plum Island is not an attractive or reasonable site for the N.B.A.F., something that we had been reassured privately, is a good thing." He noted that he, along with Senators Hillary Clinton and Charles Schumer, have made it clear to Homeland Security Secretary Michael Chertoff and his predecessor, Tom Ridge, that a level-4 lab on Plum Island is not something the community wants.

"As to whether Plum Island will cease to exist once a new facility is completed," the congressman said, "I take that to be the position of this administration. Five months from now there will be a new administration, and we will take it up with them that Plum Island has a role to play." The senators, he said, were in agreement.

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At Plum Island, a mile and a half off Orient Point, foot-and-mouth (the most contagious animal disease known) has been studied for 50 years. There are 7 types and 80 subtypes, making vaccination difficult. Foot-and-mouth affects cloven-hoofed animals such as cattle, deer, pigs, and sheep. Plum Island is the only facility in the United States currently certified to work with live foot-and-mouth virus. The research center's island location, and the fact there are only small populations of livestock in the area, account for this distinction.

Plum Island's setting is a key element in its favor as officials survey possible locations for the new bioterrorism research center. The federal government's environmental study noted that while level-4 labs are isolated within secure outer buildings, even under the best of circumstances systems can fail.

The study cited three very recent failures including the infection of workers with brucella bacteria at one of Texas A&M University's level-3 laboratories in 2006. Last year, a one-hour power outage at the new level-4 facility of the Centers for Disease Control in Atlanta caused both the main and backup power systems to fail and the negative air-pressure system, which is a major component of pathogen biocontainment, to shut down. (That lab had not yet begun its work with pathogens.) In 2007 there was also a release of foot-and-mouth disease in England due to a damaged and leaking drainage system at a research facility.

Some livestock-industry groups have urged Homeland Security not to move such a facility onto the mainland. In other countries where foot-and-mouth disease is studied, new facilities have been placed or continue to be operated offshore.

The final selection will occur within 30 days after the final environmental report is completed in the late fall. Mr. Cole noted that several factors will be weighed: cost of construction and operation, location near other research facilities, location near livestock, and the support of the area community. However, he said, which of these elements would hold most sway had not yet been determined.

Almost everyone who spoke at Thursday's hearing was opposed to the new facility coming to Plum Island. Some, including the elected officials and their representatives, advocated for continuing Plum Island's current research. Most speakers, however, were suspicious and unsupportive of any of the infectious-disease work being done there.

State Assemblyman Marc Alessi said many of the public's worries stem from a lack of trust in the facility, after years of secrecy and bad press. "I applaud your recent efforts for outreach," he said, but, he cautioned, "understand why the community needs to build trust with you."

Concerns cited at the hearing included security, effects on the environment, and the danger so close to home of pathogens communicable to humans. That Plum Island might be an attractive target among those planning acts of terrorism was apparently confirmed by the arrest of Aafia Siddique in Afghanistan last month. It has been alleged that she had maps and a list of potential targets that included the Statue of Liberty, Times Square, the New York subway system, and Plum Island, according to ABC News.

The island is not currently in a no-fly zone. It can be viewed on satellite maps on the Internet. Speakers at the hearing noted that there were minimal security cameras and guards on the island's perimeter and that boaters could go up to the beach, and there was no fencing or signs discouraging them.

Similar issues and debates are playing out in the other locations up for consideration. In North Carolina, the county government that has jurisdiction over Butner, the proposed site not far from Chapel Hill and Raleigh, has asked the

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consortium that put its nomination forward to the Department of Homeland Security to withdraw its request. The consortium respectfully declined.

Municipal and county governments of surrounding areas in North Carolina have also opposed the plan or withdrawn their support. Brad Miller, a congressman who represents the district, said in a statement that "sober, serious" concerns expressed by different branches of government had not been "satisfied." He added that his community simply does not want the facility.

There has also been resistance in Athens, Ga., another of the proposed sites, even though the Centers for Disease Control, which studies far deadlier pathogens, is located in Atlanta, some 70 miles away.

Officials at the Plum Island hearing confirmed, however, that the reception in Kansas, Mississippi, and Texas had been positive, with backers arguing that the facility could generate millions of dollars in new jobs, construction work, and taxes.

The comment period on the draft environmental report will end August 25. The report and more information about the hearings can be found at www.dhs.gov/xres/labs/editorial_0803.shtm

NBAF salaries at top end of local scale

By **Blake Aued** | blake.aued@onlineathens.com | Story updated at 11:49 PM on Wednesday, August 13, 2008

All but one job at a proposed federal animal disease laboratory will pay a higher salary than most Athens families earn, according to newly released federal documents.

If the National Bio- and Agro-Defense facility is built in Athens, salaries will range from \$43,249 for an administrative assistant to \$200,000 for the lab's director, a cost analysis from the U.S. Department of Homeland Security says.

The lab's 326 employees will earn an average of \$82,428 per year, including benefits.

"This validates some of the things we've been saying about this facility generating good, well-paying jobs both for the people who are relocating to our community and people who already live here," said Doc Eldridge, president of the Athens Area Chamber of Commerce.

The most common jobs - 92 contract workers and 40 part-time security guards - will pay \$58,261 and \$52,906, respectively. Sixty-one scientists and other employees will earn \$91,232 per year, while the highest-paid scientists will make \$126,813.

The median family income in Athens-Clarke County was \$49,734 in 2006, according to the U.S. Census Bureau.

Homeland Security estimates that 69 of the 326 jobs will go to local residents, with the rest filled by relocating government employees. The NBAF is expected to indirectly create another 157 jobs for locals.

A contractor will employ 145 people, including 52 security personnel. The U.S. Department of Agriculture will oversee 151 employees and 30 employees will work for Homeland Security.

In Athens, the NBAF's total payroll would be \$26.9 million, slightly higher than the total estimated should the lab go to fellow finalist sites in Manhattan, Kan.; Butner, N.C.; or Flora, Miss., but slightly lower than in San Antonio or Plum Island, N.Y.

Homeland Security released five new documents late Monday that provide more detail on the costs and construction challenges of building the 500,000-square-foot NBAF at each of six final sites and shutting down the Plum Island Animal Disease Center the new lab will replace. Some charts and paragraphs containing cost estimates and information about security are redacted.

Federal officials are using the documents to help prepare a final report that will guide them in choosing where to build the lab, Homeland Security spokeswoman Amy Kudwa said.

A 1,000-page draft of the report, called an

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environmental impact statement, was released in June, and Homeland Security will hold public hearings at 12:30 p.m. and 6 p.m. today at the Georgia Center for Continuing Education to discuss it and take comments.

"We're being as transparent as possible," Kudwa said.

If the highly contagious foot-and-mouth virus escaped the lab - a prospect the environmental impact statement says is extremely unlikely - Athens would be hit harder than New York but not as hard as other sites. An accidental outbreak in Clarke County would last about 47 days, kill 7,500 cattle, cost the industry \$154 million and the government \$94 million and lead to the loss of \$3.1 billion in foreign trade during a 185-day ban, according to a risk analysis. Inside a 100-kilometer radius from the lab, an outbreak could kill 570,000 cattle and affect 51 large farms.

The new documents also contain details about sewage discharge and emissions from a boiler and generators at the lab.

A natural gas-powered boiler would release 1.9 tons of nitrogen oxide and 0.9 tons of volatile organic compounds per year. Eight diesel-powered backup generators would release 16.9 tons of nitrogen oxide and one ton of volatile organic compounds during an 80-hour blackout, according to a July site characterization study. Those chemicals react with sunlight during hot summer days to produce smog.

Those figures are not particularly high - some manufacturing and power plants produce thousands of tons of the pollutants per year - but Athens is on the edge of violating new federal air pollution standards that could subject local industries to environmental restrictions. The city exceeded the new standard, which won't go into effect for several years, six times so far this year, Athens-Clarke Environmental Coordinator Dick Field said.

Sewage discharge would range from 50,000 to 150,000 gallons per day. A small amount of the sewage coming from a "tissue digester" used to dispose of animal carcasses would far exceed local sewage safety standards, but once that sewage is mixed in with the rest, it will meet Athens-Clarke County guidelines, the study says.

The lab will be required to pre-treat its sewage to get rid of pathogens and pollutants, and the discharge will be treated again at a sewer plant, Athens-Clarke Public Utilities Director Gary Duck said.

Sewage would be pumped almost two miles to an existing gravity line near a UGA soccer field on South Milledge Avenue.

Workers may need to blast bedrock at the 67-acre South Milledge Avenue site to build the partially underground facility, according to the site study.

NBAF HEARINGS

National Bio- and Agro-Defense Facility hearings

12:30-4:30 p.m. and 6-10 p.m. today

Georgia Center for Continuing Education, 1197 S. Lumpkin St.

Parking deck next door

On the Web: www.dhs.gov

The U.S. Department of Homeland Security returns to Athens today for its third and final presentation on the National Bio- and Agro-Defense Facility, a 500,000-square-foot, \$500 million laboratory where researchers will study incurable infectious animal diseases like hoof-and-mouth.

Visitors can view material and talk informally with NBAF experts for the first hour of each session. A presentation will be made during the second hour, while comments will be taken during the final two hours of the hearings. Homeland Security also is accepting written comments through Aug. 25.

Published in the Athens Banner-Herald on 081408

August 13, 2008 6:00 PM

New York: Fix site, don't build

Community promotes revamping current site rather than relocating
Bill Felber felber@themercury.com

GREENPORT, N.Y. — About 80 residents of this upscale community just across Great Peconic Bay from the Hamptons came to the local school Tuesday night in an effort to negotiate with the Department of Homeland Security. They want DHS to fix up the Plum Island Animal Disease Center about a mile and a half off shore. They don't want a new level four facility to be built next to the present level 3 one, nor do they want the existing facility to be combined with a new National Bio and Agro-defense Facility and moved.

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Such a division is not the deal DHS is promoting during a series of site visits to the six locations under consideration to host the NBAF. The DHS proposal envisions an NBAF that combines research presently being conducted at Plum Island with additional research not presently being performed in the United States on several zoonotic diseases – essentially diseases capable of being passed from animals to humans. Those included rift valley fever virus and nipah virus.

"There is no disputing that the work presently done (at Plum Island) is essential," argued Debra O'Kane, one of several local residents who asked DHS to save the current facility but not add to it. She cited strong community "fear and mistrust" prompted by what she described as a history of the government failing to deliver on promises to enhance security at the existing facility.

María Domenici, a local resident, gave voice to the concerns that she and others said were widespread throughout the Greenport community.

"There's only partial perimeter monitoring on the island," she said. "If I go into a 7-Eleven, I'm on video. The fact the island is video void is disconcerting."

Some in the audience supported an alternative open to DHS but little discussed to this point: No action. That means Plum Island would continue to operate as a level 3 facility, but no NBAF would be built and no research on zoonotic diseases would take place. "Lets continue the dialogue," contended state Assemblyman Marc Alesst.

"You should put off making a decision (until a new administration is installed in Washington)," contended Gwynn Schroeder, another local resident.

And Jerry Callas, who identified himself as one of the original Plum Island workers, told DHS officials they would be foolish to move research on foot and mouth disease — a main preoccupation of Plum Island at present — onto the mainland in a combined facility.

"FMD is one of the most elusive viruses known," he said. "I cannot conceive of it being moved to North Carolina, Georgia, Mississippi, Kansas or Texas."

Some of the opponents appeared to be operating out of a simple and deep suspicion of the government. Elizabeth Holtzman, an area resident and former congresswoman who in the 1970s sat on the House committee that impeached President Nixon, openly questioned whether DHS could mount a reasonable defense against such problems as rogue scientists. Citing recent developments in the 2002 anthrax case, Holtzman challenged "anyone to say the risk is negligible."

One resident challenged Louis Rodriguez, a Department of Agriculture scientist working with the NBAF project, to explain why research into zoonotic diseases such as rift valley fever virus is even necessary.

"There is a high risk that rift valley fever virus might come into this country," Rodriguez said in response. "We are very vulnerable to this disease."

Because of the nature of the disease, DHS officials say it can only be studied at a level four lab, which provides a more secure setting than level three facilities such as Plum Island. There are several level four labs in the United States, but none of them do research into animal borne diseases.

Despite the requests of the Greenport area residents, DHS officials do not consider maintaining the 50-year-old Plum Island facility, while also opening a new level four facility elsewhere, to be a viable option. Rather, they believe that combining similar research at a single site is likely to make the research more productive. Cost is also an issue.

The final site visit among the six sites still being considered will take place Thursday at the University of Georgia in Athens. There, as in Butner, N.C., and Greenport, significant opposition has surfaced and is expected to show itself Thursday. The relatively lesser opposition seen at Manhattan, Flora, Miss., and San Antonio is one of the reasons why those cities are considered front-runners. DHS officials have said often that community support will be a major factor in the final site selection.

That selection will be made by undersecretary Jay Cohen late in the year, and is expected to be based in large part on the recommendation of a steering committee. The chairman of that steering committee, Jamie Johnson, has also chaired the hearings at the six finalist sites.

Pochapsky, Susan

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WD0510

From: Susan Chapek Pochapsky [REDACTED]
 Sent: Friday, August 22, 2008 2:48 PM
 To: NBAFProgramManager
 Cc: [REDACTED]
 Subject: NBAF: why not build it on an oil rig?

NAME: Susan C. Pochapsky

TITLE: Citizen ORGANIZATION: None

ADDRESS: [REDACTED] NC [REDACTED]

COMMENTS:

- 1| 5.3 | To Whom It May Concern:
- The NBAF cannot be safely operated in any of the proposed locations, except possibly on Plum Island.
- 2| 4.3 | The Draft EIS for NBAF failed to answer a huge number of questions about cost and safety.
- 3| 21.3 | But even if all of those questions are completely and precisely answered in the final Environmental Impact Statement, concerns about safety and expense will remain, and these will threaten America's public safety and its economy for as long as the NBAF exists.
- 4| 23.0 | The most obvious concern is the ridiculous assumption that only the diseases named in the proposal would be studied in the NBAF. The assumption must rather be that any and all animal and animal-human diseases could eventually be studied in the lab. The public safety risks are therefore completely unpredictable and must be treated as infinite.
- 5| 19.0 | Even if only the proposed diseases are studied, however, the lab provides a never-ending risk. Safety flaws, safety failures, safety violations—even possible criminal acts—have been documented in other research labs. The NBAF will always be vulnerable to the same threats. Should a major public safety problem occur, the cost could be catastrophic. It is a grave disservice to gamble that there will never be such an event.
- 2 cont| 21.3 |
- 6| 2.0 | Surely it is the mission of DHS to increase safety, rather than to increase the threat level?
- 1 cont| 5.3 | The NBAF should only be built in as isolated and secure a location as exists. The arguments against doing this are flabby.
- Concerns about whether researchers will prefer to live in such isolation are ridiculous; if the work is exciting, scientists will live as far away as Antarctica to do it.
- The extra cost of isolation pale in comparison to the cost of the lives lost and damage to property and animals

Comment No: 1 Issue Code: 5.3

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

Comment No: 2 Issue Code: 4.3

DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. 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. The decision on whether to build the NBAF 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.

The Department of Homeland Security Under Secretary for Science and Technology Jay M. Cohen, with other Department officials, will consider the factors identified above in making final decisions regarding the NBAF. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the Final NBAF EIS is published.

Comment No: 3 Issue Code: 21.3

DHS notes the commentor's concern regarding the NBAF. The purpose and need for the proposed action is discussed in Chapter 1 of the NBAF EIS. DHS can not guarantee that the NBAF would never experience an accident. However, as discussed in Section 2.2.1.1, modern biosafety design substantially diminishes the chances of a release as the primary design goal is to provide an adequate level of redundant safety and biocontainment that would be integrated into every component of the building. A discussion of human health and safety is included in Section 3.14.

Comment No: 4 Issue Code: 23.0

DHS notes the commentor's concern that all possible pathogens to be studied at the NBAF are not listed in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Chapter 2, Section

2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluate of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required.

Comment No: 5 Issue Code: 19.0

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: 6 Issue Code: 2.0

DHS notes the commentor's concern about safety. 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.

Pochapsky, Susan

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WD0510

that could result from a safety accident. Consider the extra expense as genuine Homeland Security.

Build NBAF, indeed--but build it in a desert wilderness. In fact, why not build it on something like an oil rig, out in the ocean?

Poland, George

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PD0134

August 20, 2008

1| 25.4

This is George Poland, [REDACTED], and I'm an agro producer...cattle producer in [REDACTED] County, and I am concerned about the risks out weighing the rewards for this center. And I'm opposed to it.

That was all.

Thank you.

Comment No: 1

Issue Code: 25.4

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

Polansky, Adrian

Page 1 of 2

WD0771

From: Polansky, Adrian [Adrian.Polansky@KDA.KS.GOV]
Sent: Monday, August 25, 2008 4:03 PM
To: nbafterprogrammanager@dhs.gov
Subject: NBAF EIS Written Comments

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

RE: Written Comments on NBAF Draft Environmental Impact Statement

Dear Mr. Johnson:

I recently had the opportunity to appear before a Department of Homeland Security panel at a public meeting in Manhattan, Kansas, on the NBAF draft environmental impact statement. I appeared as Kansas' leading agriculture official representing the broad spectrum of Kansas' agriculture industry.

- As secretary, I get to visit every corner of the state and take part in countless conversations with Kansas farmers and ranchers. Consistently I have heard words of support for this project, as well as concern that some research is not already under way. Folks involved in farming and ranching understand that a focused, national research initiative is needed to protect American agriculture and our national economy.
- 1| 1.0
- 2| 1.0 We know this because we have talked about different threats to agricultural production. With regard to foreign animal disease, we have planned for and practiced what we will do if we are faced with one. The Kansas Department of Agriculture will join with the Kansas Animal Health
- 3| 21.4 Department, as well as many local, state and federal partners, in an orchestrated effort to stop any disease that threatens livestock production. Research capabilities at the National Bio- and Agro-Defense Facility could be crucial to our response effort, but we don't perceive the facility itself to be a threat. We believe that the stringent protocol for biosafety level 4 labs is sufficient to contain the diseases being studied.
- 4| 24.4 There are a few detractors who will condemn NBAF regardless of where it is built, but I feel confident when I say there's no better place than Kansas. We are centrally located, we have research expertise, and we have a well-educated and capable workforce. We also have a
- 5| 8.4 hospitable agriculture community that recognizes the pivotal role our state can play supporting this facility.
- 6| 8.4 Kansas continues to express unified support for this project across all sectors, both public and private. We have a clear understanding and appreciation for the NBAF mission, and we have the necessary academic and research-based infrastructure to support a facility of this magnitude. We

Comment No: 1 Issue Code: 1.0

DHS notes the commentor's support for the proposed research that would be conducted within the NBAF. 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: 1.0

See Comment No. 1.

Comment No: 3 Issue Code: 21.4

DHS notes the commentor's statement.

Comment No: 4 Issue Code: 24.4

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

Comment No: 5 Issue Code: 8.4

DHS notes the commentor's statement.

Comment No: 6 Issue Code: 8.4

DHS notes the commentor's statement.

Polansky, Adrian**Page 2 of 2****WD0771**

cont. | 6 | 8.4 | have a highly trained workforce with expertise in animal health issues, and our agricultural community has put out the welcome mat to show that we value NBAF as a neighbor.

7 | 5.4 | I sincerely appreciate your agency's vote of confidence in Kansas as a potential site for the National Bio and Agro-Defense Facility. It speaks well of Kansas' strong agricultural tradition, of our leadership in food production, and of our well-established and well-respected veterinary medical research sector.

8 | 24.4 | Kansans have the leadership, the ingenuity and the enterprising spirit necessary to make our state a good home for the National Bio- and Agro-Defense Facility. I look forward to your agency's decision to locate NBAF here.

Respectfully,

Adrian J. Polansky
Secretary of Agriculture
109 SW 9th Street, 4th Floor
Topeka, KS 66612-1280
(785) 296-3902
Fax: (785) 296-8389
apolansky@kda.state.ks.us

Comment No: 7 Issue Code: 5.4

DHS notes the commentor's statement.

Comment No: 8 Issue Code: 24.4

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

Pond, Kimberly

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MD0091

From: "Write your representative" <writerep@heoc-www6.house.gov>
Date: 5/27/2008 9:01:09 AM
To: in04hwyz@houseemail.house.gov
Subject: WriteRep Responses

DATE: May 27, 2008 08:59 AM
NAME: Kimberly Pond
ADDR1: [REDACTED]
ADDR2: [REDACTED]
ADDR3: [REDACTED]
CITY: [REDACTED]
STATE: Indiana
ZIP: [REDACTED]
PHONE: [REDACTED]
EMAIL: [REDACTED]
Message:
Kimberly Pond
[REDACTED]

RECEIVED BY DHS EXEC SEC
2008 SEP -5 PM 1: 10

May 27, 2008

The Honorable Steve Buyer
House of Representatives
2230 Rayburn House Office Building
Washington, DC 20515-1404

Representative Buyer:

1|24.1 Please continue to keep the National Bio- and Agro-Defense Facility on Plum Island in New York to minimize outbreak potential. It is not in the best interest of the country to move it. Increase the security at the current location if there are concerns over homeland security. Moving it would make it a greater risk to homeland security because it could infect the food supply. Thank you for considering my concerns.

Sincerely,

Kimberly Pond

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

Populi, V

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NCD020



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: V. Populi

Title: Citizen

Organization: United States of America

Address: [REDACTED] NC

City: _____ State: _____ Zip Code: _____

Comments: I'm writing this as I sit at the public comment meeting for the DEIS, at Biltmore, July 29, 2008. It's absolutely clear that the community does not want the NBAF. One speaker read a very long list of groups, organizations, and municipalities that have withdrawn their support and/or actively oppose the NBAF. Many individuals have expressed their opposition tonight, cogently, rationally, forcefully, and often angrily. Their anger does not delegitimize their well-founded opposition. These are the voices of the community, not the consortium that has courted the lab. According to a recent newspaper article, a DHS spokesperson has stated that you will not build the lab here if the community doesn't want it. The community does not want it! In the name of democracy, honor that commitment. If you don't, there will be endless

(Continued on back for your convenience)

NATIONAL BIO AND AGRO-DEFENSE FACILITY
 Director of National Laboratories
 Science and Technology Directorate
 125.3

Comment No: 1

Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative based on community acceptance. Community acceptance is only one of several factors that will affect the decision on whether or not the NBAF is built, and, if so, where. The decision will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in section 2.3.1 (includes community acceptance); 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.

Populi, V

Page 2 of 2

NCD020

1 cont.
25.3

citizen actions, legal challenges, and other forms of opposition. You'll wish you had chosen a different site.

I expect to see this comment reproduced in the next EIS document, and I sincerely hope you'll heed this advice.

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)

Potts, Donna

Page 1 of 1

WD0242

From: Donna L. Potts [REDACTED]
Sent: Tuesday, August 12, 2008 10:36 PM
To: NBAFProgramManager
Subject: Manhattan KS

1|25.4; NBAF does not belong in Manhattan KS, in the middle of the country, but rather, on an island
2|24.1; somewhere, and specifically, Plum Island. The government's own report concluded as much, so I
3|21.4 can't believe NBAF has any serious intention of locating here. Accidents could not be contained,
terrorist activity would have wide-ranging repercussions, AND we're well aware that we have
tornadoes that can tear apart any building, even one that is seemingly indestructible. Why risk
lives (our lives?) for such a facility? Don't the lives of Kansans matter to the government?

Donna Potts

Comment No: 1 Issue Code: 25.4

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

Comment No: 2 Issue Code: 24.1

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

Comment No: 3 Issue Code: 21.4

DHS notes the commentor's concerns. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are extremely 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.

DHS notes the commentor's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed to withstand the normal meteorological conditions that are present within the geographic area of the selected site. The basis for establishing the anticipated wind speeds were the International Building Code, ASCE 7 and the local jurisdictions. However, because of code specified building importance modification factors and normal factors of safety incorporated into the structural design, the facility would resist wind pressures up to 170% of the code specified 50-year wind pressures. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period.

In the unlikely event that a 500-year wind storm strikes the facility, the exterior walls and roofing of the building would likely fail first, and this breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. The loss of these architectural wall components would decrease the overall wind loading applied to the building and therefore diminish the possibility of damage to the building's primary structural system. Even with the failure of these interior and exterior wall systems under an extreme wind loading event, the robust construction used to construct BSL-3Ag and BSL-4 spaces, reinforced cast-in-place concrete walls, would resist these wind forces and the primary bio-containment envelope would not be breached. The containment walls will be designed to withstand a 200 mph wind load, which is equivalent to an F3 tornado according to the FEMA Design and Construction Guidance for Community Shelters standards.

Praeger, Sandy

Page 1 of 1

WD0204

From: Sandy Praeger [SPraeger@ksinsurance.org]

Sent: Wednesday, August 06, 2008 4:37 PM

To: NBAFProgramManager

Subject: NBAF in Kansas

1|24.4 | Just wanted to send a note of support for the location of this very important research facility at Kansas State University in Manhattan, Kansas. Such a facility will benefit our country for years to come.

Sandy Praeger
Kansas Commissioner of Insurance

Comment No: 1 Issue Code: 24.4

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

Pratt, Nancy

Page 1 of 1

WD0177

From: Nancy Pratt [REDACTED]
Sent: Tuesday, August 05, 2008 8:52 AM
To: NBAFProgramManager
Subject: no NBAF

To Whom it May Concern,

1| 19.0 | I am requesting that you do not build this facility. It is a danger to the environment as well as the
 2| 15.0 | people who live in the surrounding areas. The jobs it will bring in are few, especially compared to the
 3| 5.0 | great dangers this facility would bring. I suggest that you find an extremely remote area where there are
 few people and wifelife.

Thank You.

Nancy Pratt

Got Game? Win Prizes in the Windows Live Hotmail Mobile Summer Games Trivia Contest [Find out how.](#)

Comment No: 1 Issue Code: 19.0

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: 2 Issue Code: 15.0

DHS notes the commentor's statement regarding employment. The number of the potential short-term and permanent jobs are discussed in Section 3.10. Specifically, DHS estimates that the NBAF will employ between 250 and 350 workers. Whether these jobs are filled by workers currently employed at the PIADC or by the local labor force, the NBAF will generate economic activity and employment that would otherwise not take place.

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 Expressions of interest.

Pratt, pratt8075@aol.com

Page 1 of 1

WD0663

From: [REDACTED]
Sent: Friday, August 22, 2008 5:30 PM
To: NBAFProgramManager
Subject: Bring this to Mississippi

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

Prescott, Kathy

Page 1 of 1

WD0608

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Saturday, August 23, 2008 4:45 PM
To: NBAFProgramManager
Cc: Director@athensfaq.org
Subject: COMMENT/QUESTION: NBAF FUTURE EXPANSION

Dear Mr. Johnson,

Please add this COMMENT/QUESTION to those being considered for the NBAF FEIS.

1|23.0

There are many references to FUTURE EXPANSION of NBAF shown in drawings and mentioned in the text of the Feasibility Study. For example, on page 7-6 under SITE/BUILDING CONCEPTS, "All schemes provide the opportunity for successful future expansion of each type of program". It is also stated in the Log of Amendments to the NBAF Feasibility Study (dated August 24, 2007) that "Future expansion of the NBAF program has been eliminated as one of the criteria for evaluating each of the short listed sites therefore has been deleted from the current site diagrams".

WHAT DOES THIS MEAN - "ELIMINATED AS ONE OF THE CRITERIA"? IS THERE OR IS THERE NOT PLANNING FOR FUTURE EXPANSION AT NBAF? CAN YOU RULE OUT NBAF FUTURE EXPANSION COMPLETELY?

FUTURE EXPANSION of NBAF would have dramatic effects on every aspect the environment: land use, visual, more stress to infrastructure (potable water, electricity, fuel oil and gas, sanitary sewer), air quality, noise, geology, water resources, biological resources, socioeconomics, traffic, waste management, health and safety, and cumulative effects.

THIS WAS NOT ADDRESSED IN THE DEIS. THE FEIS MUST ANSWER THESE QUESTIONS AND ADDRESS THE POTENTIAL IMPACTS OF NBAF FUTURE EXPANSION ON THE SOUTH MILLEDGE AVENUE SITE.

Respectfully submitted,

Kathy Prescott
 Co-Founder, *FAQ, inc.*
 For Athens Quality-of-Life

Comment No: 1 Issue Code: 23.0

DHS notes the commentor's statement regarding NBAF figures in the Conceptual Design and Feasibility Study that showed future expansion components. The figures' illustrating future expansion sole purpose was to show how each diagram and site might lend itself to future expansion should the need arise. However, DHS has no plans for future expansion beyond the program contained in the Conceptual Design and Feasibility Study.

Prescott, Kathy

Page 1 of 2

WD0704

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Monday, August 25, 2008 11:42 AM
To: NBAFProgramManager
Subject: COMMENT: SUBMITTED QUESTIONS

Dear Mr. Johnson,

I submit the following questions as a COMMENTS/QUESTIONS to be addressed and answered in the NBAF FEIS.

Respectfully submitted,

Kathy Prescott
 Co-Founder, *FAQ, inc.*
For Athens Quality-of-Life

1) Will DHS commit, in writing, not to perform classified research at NBAF? If not, then why have lab proponents such as the University of Georgia stated categorically that NBAF will not conduct classified research?

1|23.2

2) Will DHS commit, in writing, to conducting open to the public institutional biosafety committee meetings at NBAF? If yes, then why does DHS not have open meetings or have meeting minutes from its committee at Plum Island?

3) Apart from smallpox, which is restricted to CDC by international agreement, what Risk Group 4 agents (the most dangerous) will DHS categorically rule out from NBAF? Will it commit, in writing, not to study, for example, Ebola and Marburg viruses at NBAF? (Please don't talk about 'plans', talk about policy.) If no diseases are ruled out, then what is the significance of the list that DHS has released?

4) DHS has released a very short indicative list of eight "diseases of interest" to be studied at NBAF. NBAF proponents have claimed that other diseases will not be studied. But NBAF's mandate under Presidential Directive is to research countermeasures for incorporation into the National Veterinary Stockpile (NVS). The current list of disease threat priorities for the NVS indicates 17 diseases, including bioweapons agents like Venezuelan Equine Encephalitis and Q Fever (*Coxiella burnetii*). These do not appear on DHS's list of "diseases of interest". Will you explain the discrepancy between the short "diseases of interest" list and the Presidential Directive that ordered the construction of NBAF? Also, are the lab proponents correct when they claim that only 8 "diseases of interest" will be studied?

2|21.2

5) I understand that you will try hard to prevent it; but please describe the worst case scenario for people and animals in the event of a major accident at NBAF. Please describe the effect on agriculture of a major leak of foot & mouth disease or highly-pathogenic avian influenza or equine encephalitis. Please describe what would happen to people if there was a leak of nipah or ebola viruses.

Comment No: 1 Issue Code: 23.0

DHS notes the commentator's concerns. There would be no classified research at the NBAF, however there may occasionally be classified FBI forensics cases.

Oversight of the 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 representation, participation and the APHIS Research Policy and Institutional Animal Care and Use Committee.

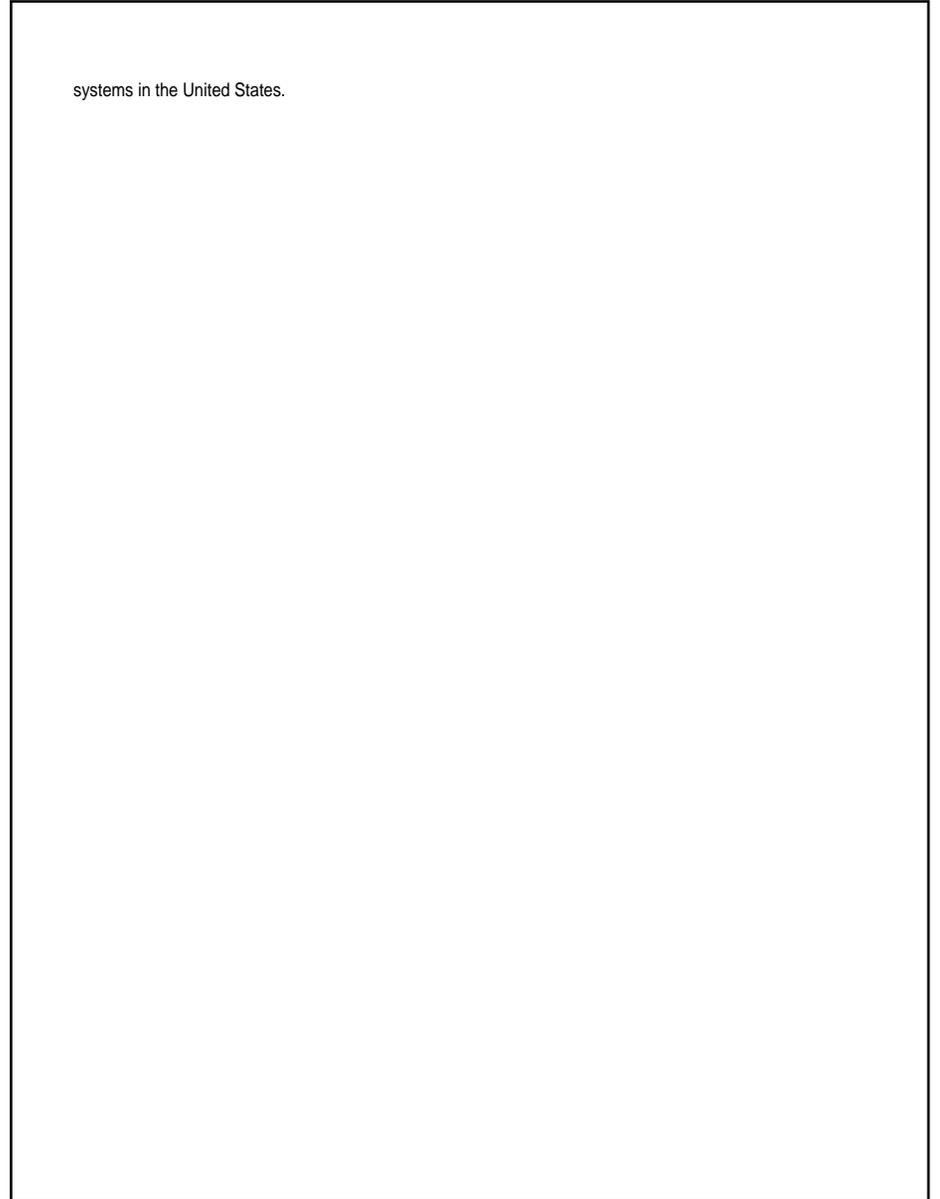
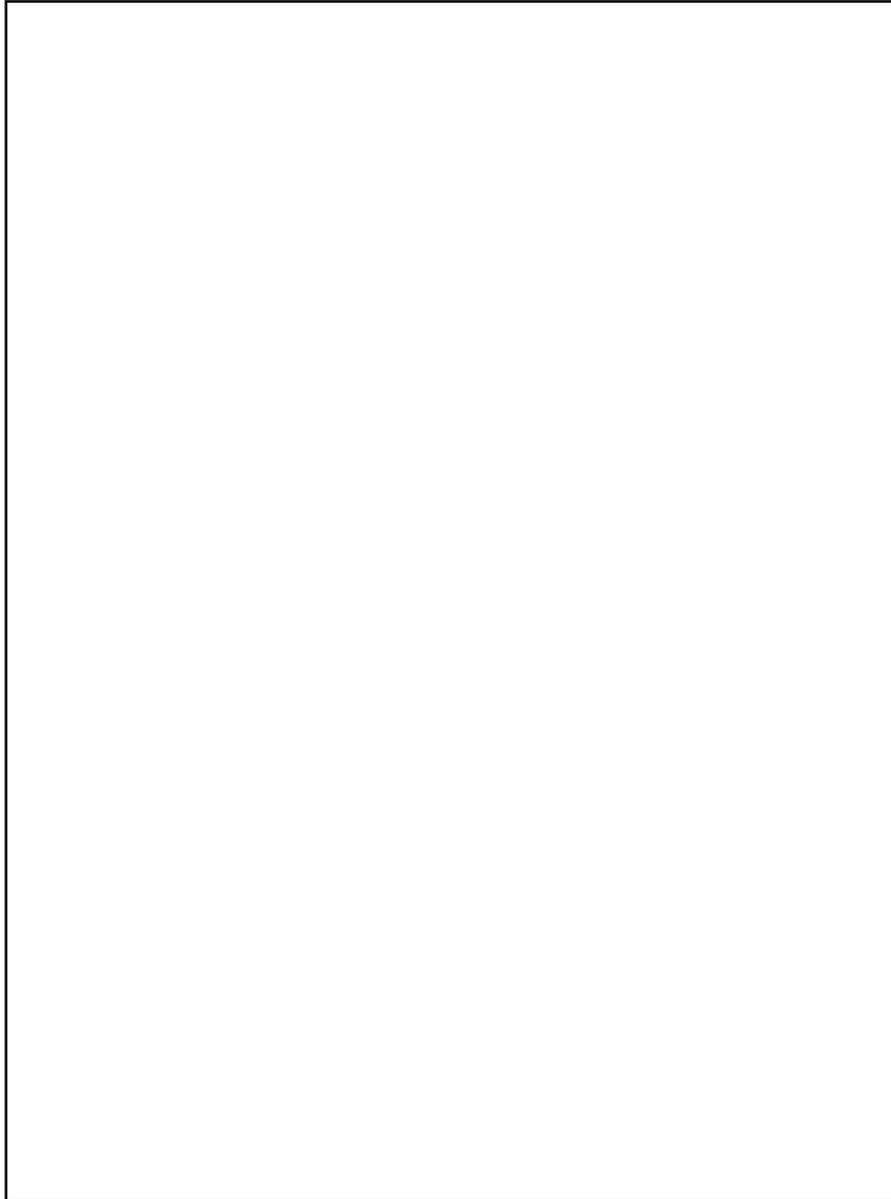
The NBAF's mission is defensive and would not involve offensive bioweapons research or development. The international treaty, known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The 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.

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

Section 2.2.2.1 of the NBAF EIS discusses the requirement that all laboratory staff would receive preoperational training as well as ongoing training in the handling of hazardous infections agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics.

Comment No: 2 Issue Code: 21.2

DHS's mission is defensive and would not involve offensive bioweapons research or development. The international treaty, known as the Biological and Toxin Weapons Convention, to which the United States is a signatory, prohibits the development, production, stockpiling and acquisition of such weapons. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The 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



Prescott, Kathy

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WD0704

1|23.2
(cont.)

(6) The United States has never had or operated a 50,000 square foot BSL-4 facility before and, already, there are extreme shortages of qualified and experienced people to operate biodefense labs, because we have never had nearly as many as we are building now. Plum Island does not have BSL-4. The only serious federal training program only produces one or two qualified persons per year, for the entire country. What is the DHS plan to make sure that NBAF will be operated by experienced and competent personnel?

Prescott, Kathy

Page 1 of 3

WD0719

 From: Kathy Prescott [preskat@bellsouth.net]

Sent: Monday, August 25, 2008 12:37 PM

To: NBAFProgramManager

Subject: COMMENT: New angle for med campus foes

Dear Mr. Johnson, I submit this article from the local Athens, GA newspaper (dated August 23, 2008) as a COMMENT to be considered in the NBAF FEIS. This is a controversial issue and not one that is fully accepted by everyone. This should be noted since Jay Cohen (in the Final Selection Memorandum) considered a medical campus in Athens as a strength. It could prove to be an ongoing political story. Respectfully submitted, Kathy Prescott Co-Founder, FAQ,inc. For Athens Quality-of-life

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Buzz up!

New angle for med campus foes

State's deficit cited as reason to delay Athens expansion

By BLAKE AUED | blake.aued@onlineathens.com | Story updated at 11:28 pm on 8/23/2008

Anyone who thinks the Athens-Augusta rivalry is over, think again.

Some Augusta-area lawmakers want to delay expanding the Augusta-based Medical College of Georgia to Athens in the face of a state budget crisis.

Funding and plans to begin training physicians in Athens within two years already are under way, but two Augusta legislators said the state cannot afford to go through with an MCG-University of Georgia health sciences campus on an Athens Navy base that's closing in 2011.

The state needs to reprioritize spending in the face of a \$1.5 billion to \$2 billion budget shortfall, said state Sen. Ed Tarver, D-Augusta. Tarver, like other Democrats, is calling for a special legislative session to deal with the deficit.

"Although (the Athens medical school) may be a priority, it is one that may be delayed until the current budget crisis is ended," Tarver said.

Athens lawmakers, though, said the medical school plans are on track and won't be reconsidered, and Republicans say a special session is unneeded and unlikely.

Comment No: 1

Issue Code: 27.0

DHS notes the information submitted by the commentor.

1|27.0

Prescott, Kathy

Page 2 of 3

WD0719

Georgia ranks 40th in the nation in physicians per capita, so training more doctors is a top priority, said state Reps. Doug McKillip, D-Athens, and Bob Smith, R-Watkinsville, chairman of the House appropriations subcommittee that oversees higher education spending.

"The last thing Democrats should want to cut is education," McKillip said. "That is playing to their political local base, and it's too much."

Augusta lawmakers fought the Athens MCG expansion tooth and nail last year as rumors swirled in Augusta that the entire medical school would pick up and move to Athens. A five-member House study committee recommended expanding MCG in Athens, Augusta, Savannah and Albany on the advice of a consultant. The legislature approved spending \$10 million to start work on the Athens expansion, along with \$70 million toward a new dental school in Augusta.

"That is proof positive that Augusta is still the center of medical education," Smith said.

1|27.0
cont.

But state officials thought they were on solid financial footing at the time, and the legislature should take a second look at that decision, said state Rep. Quincy Murphy, D-Augusta, who served on the study committee in 2007 and criticized the expansion plan.

"We need to see exactly where we are financially," Murphy said. "I'm not going to cut it for the sake of cutting it. We need to look at it from a practical standpoint."

Murphy said he would not consider scaling back state funding for the MCG dental school, calling it "an emergency." Tarver said the dental school is a higher priority than the Athens medical school, but should still be on the table for cuts.

UGA anticipates continued political support, said Tim Burgess, the university's senior vice president for finance and administration. UGA and MCG are on track to begin offering classes at the former O'Malley's building in fall 2010 and move classes to the Navy Supply Corps School campus after the Navy vacates the Prince Avenue base in 2011, he said.

"We're proceeding as if everybody's intent is to expand medical education in this state," Burgess said.

Like other state agencies, the University System Board of Regents is cutting spending 8 percent to 10 percent. But funding for the medical school remains mostly intact - regents voted Wednesday to ask the legislature for another \$8 million next year.

A 2006 UGA report pegged the cost of building a campus at the Navy school at \$200 million to \$250 million, but initial costs will be far lower, Burgess said. The first classes of 40 students each will use existing buildings and new buildings will be constructed as needed, he said.

"They've got classrooms that are state of the art," Burgess said. "You could walk in there and start holding classes right now."

Prescott, Kathy

Page 3 of 3

WD0719

UGA will meet a May 2010 deadline to nail down political and financial support for the medical school, Burgess said. Otherwise, the 58-acre Prince Avenue property will be split between UGA and a private developer, according to an agreement with Athens-Clarke County and the Navy.

127.0
(cont.)

That deadline leaves plenty of time to fund the campus in 12 to 18 months, when the Georgia economy is expected to recover, Murphy said.

"Sometimes you have to slow down," he said. "When you stall out, you can't go full speed."

If construction costs prove too expensive, Tarver said he is willing to give up the free property, valued at about \$60 million, Tarver said.

"Although the Navy property is free, it's going to take an enormous investment to convert the property into something suitable for a medical school," he said.

But Athens-area lawmakers dismissed the talk out of Augusta as just talk. They might simply be floating ideas for budget cuts, said state Sen. Bill Cowsert, R-Athens.

"We are all trying to come up with ideas this month for where there might be room to cut," Cowsert said. "I think it's unlikely there is any merit to those rumors."

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Prescott, Kathy

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WD0459

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Friday, August 22, 2008 2:58 PM
To: NBAFProgramManager
Cc: director@athensfaq.org
Subject: COMMENT: INCONSISTENCIES in NBAF DEIS

Dear Mr. Johnson,
 Please accept this list of INCONSISTENCIES as an NBAF DEIS COMMENT to be addressed in the FEIS.

Respectfully submitted,

Kathy Prescott
 Co-Founder, FAQ, inc.
 For Athens Quality-of-life

**NBAF DEIS INCONSISTENCIES that relate to the
 South Milledge Avenue Site
 Athens, GA**

VISUAL EFFECTS

(page ES-7)

"Long-term effects due to operation of the NBAF would occur, particularly at the South Milledge Avenue Site ... where the NBAF would be visible to nearby residential or recreational receptors."

(page 3-8)

Land Use:

"There are no adjacent neighborhoods."

(page 3-8)

Visual Resources:

"Visual sensitivity is **low** because the site is located in a predominately rural environment with few individuals observing the site on a regular basis."

(page 3-10)

Construction Consequences:

"In general, visual impacts to the overall landscape setting resulting from construction of the NBAF would be **high**."

(page 3-12)

Operation Consequences:

"Visual impacts from the proposed NBAF would be **high**."

THE EXECUTIVE SUMMARY TABLE SAYS **MODERATE** for Visual

Comment No: 1 Issue Code: 26.0

DHS notes the information provided by the commentor.

Comment No: 2 Issue Code: 4.2

DHS notes the commentor's concern. As described in Section 3.2.3 of the NBAF EIS, there are no residential developments immediately adjacent to the South Milledge Avenue Site. However, the NBAF would be visible to some nearby residents and those driving by the site. The designation of visual resources as "moderate" in the summary tables is correct, and the text in Section 3.2.3 has been modified accordingly. The South Milledge Avenue Site Alternative would require 2 new water lines and the summary tables have been modified to reflect this.

1| 26.0
 2| 4.2

Prescott, Kathy

Page 2 of 4

WD0459

1 cont. |
26.0**INFRASTRUCTURE**2 cont. |
4.2

(page ES-7)

Potable Water:

"All sites have available capacity to meet this demand. The South Milledge Avenue site would need new water lines."

HOW CAN THE DEIS STATE THAT SOUTH MILLEDGE AVENUE HAS THE CAPACITY TO MEET THE POTABLE WATER DEMANDS WHEN IT STATES BELOW:**Potable Water Supply:**

(page 3-33)

"There is an 8-inch potable water force main along South Milledge Avenue that has been determined to not have sufficient capacity to accommodate future demand from the proposed NBAF."

3| 12.2

(page 3-35)

The current Athens-Clarke County Public Utilities infrastructure of an existing 8-inch force main on South Milledge Avenue would not meet the potable water feed redundancy specifications or the consumption/peak flow requirements for the proposed NBAF without **substantial improvements**. The proposed upgrades to the municipal potable water system include the installation of a dedicated, on-site 200,000 gallon elevated water tank at the South Milledge Avenue Site. The new elevated tank can be fed from the existing 8-inch water lines on either Whitehall Road or South Milledge Avenue. Based on the information provided, the proposed improvements would not comply with the redundancy specifications and the peak flow requirements for the proposed NBAF.

An alternate infrastructure improvement plan, authored but not recommended by Athens-Clarke County, is to extend a 12-inch water line to the South Milledge Avenue Site along Whitehall Road from the intersection of Barnett Shoals Road and Gaines School Road and to extend a second, redundant 12-inch water line to the South Milledge Avenue Site from Riverbend Road. Should this alternative be selected, the alternate improvements would comply with both the redundancy specifications and the peak flow requirements.

(page ES-8)

Water:

Potential effects to water resources could occur with construction activities and would be similar for all sites. However, the South Milledge Avenue Site is closer to surface waters so the potential for effects are greater at this site. Similar effects could occur with operation of the NBAF.

THE EXECUTIVE SUMMARY TABLE SAYS **MODERATE** for InfrastructureTHE EXECUTIVE SUMMARY TABLE SAYS **MINOR** for Water**AIR
QUALITY**

(page 3-57)

Comment No: 3

Issue Code: 12.2

DHS notes the commentor's statement. Section 3.3.3.3.1 of the NBAF EIS describes the current lack of potable water line redundancy and peak flow capabilities. If the South Milledge Avenue Site Alternative is selected, improvements would be required to meet both water line redundancy and peak flow requirements. Upon further consideration, the EIS now indicates the potential water impact rating as moderate.

Prescott, Kathy

Page 3 of 4

WD0459

1 cont.
26.0

"The proposed pathological waste disposal method for the NBAF has not been determined at this time and would be an influencing factor on facility air emissions."

4| 9.2

(page 3-64)

"Based on the AMP 2006 Ambient Air Surveillance Report, all of Georgia is in attainment for CO, NO₂, SO₂, Pb, and PM₁₀. Statewide compliance with the O₃ and PM_{2.5} standards continues to be a challenge."

(page 3-66)

"If incineration is the selected waste disposal method, the proposed NBAF would likely be considered a major Title V air emission source."

(page 3-67)

"Most criteria pollutant impacts were less than NAAQS. Only PM_{2.5} exceeded the NAAQS. The ratio of background concentration of PM_{2.5} to the NAAQS ranges from 69% to 89%, making demonstration of compliance with the PM_{2.5} standard difficult without further evaluation. It should be noted that PM_{2.5} exceeded the NAAQS at all sites."

THE EXECUTIVE SUMMARY TABLE SAYS **MINOR** for Air Quality

THERE IS NO SPECIFIC MENTION OF ATHENS / CLARKE COUNTY COMPLIANCE PROBLEMS WITH OZONE AND PARTICULATE MATTER ALTHOUGH THE DEIS DOES MENTION TEXAS AND PLUM ISLAND PROBLEMS.

THERE IS NO REALISTIC DISCUSSION OF POTENTIAL AIR QUALITY CONCERNS IN THE DEIS BECAUSE THE PATHOLOGICAL WASTE DISPOSAL METHOD FOR THE NBAF HAS NOT BEEN DETERMINED.

WASTE MANAGEMENT

5| 18.2

(page ES-10)

"Moderate effects that would occur would be to the following resources": Wastewater treatment capacity

THE EXECUTIVE SUMMARY TABLE SAYS **MINOR** for Waste Management

AGAIN, THERE IS NO REALISTIC DISCUSSION OF POTENTIAL WASTE MANAGEMENT CONCERNS BECAUSE THE PATHOLOGICAL WASTE DISPOSAL METHOD FOR THE NBAF HAS NOT BEEN DETERMINED.

HEALTH AND SAFETY

6| 19.2

(page ES-9)

This category is very misleading. In the body of the Executive Summary, under the heading of Health and Safety, it states:

"For all sites except the Plum Island Site, the overall risk rank was **MODERATE** due to the

Comment No: 4

Issue Code: 9.2

DHS notes the commentor's concern for air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3. Air pollutant concentrations were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. The SCREEN3 modeling estimates combined with the ambient air background concentrations exceeded the PM_{2.5} national ambient air quality standards. The EIS has been modified to reflect a moderate rating for the South Milledge Avenue Site Alternative's air effects. Once a final site is selected and final design completed, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF does not significantly affect the region's ability to meet air quality standards.

Comment No: 5

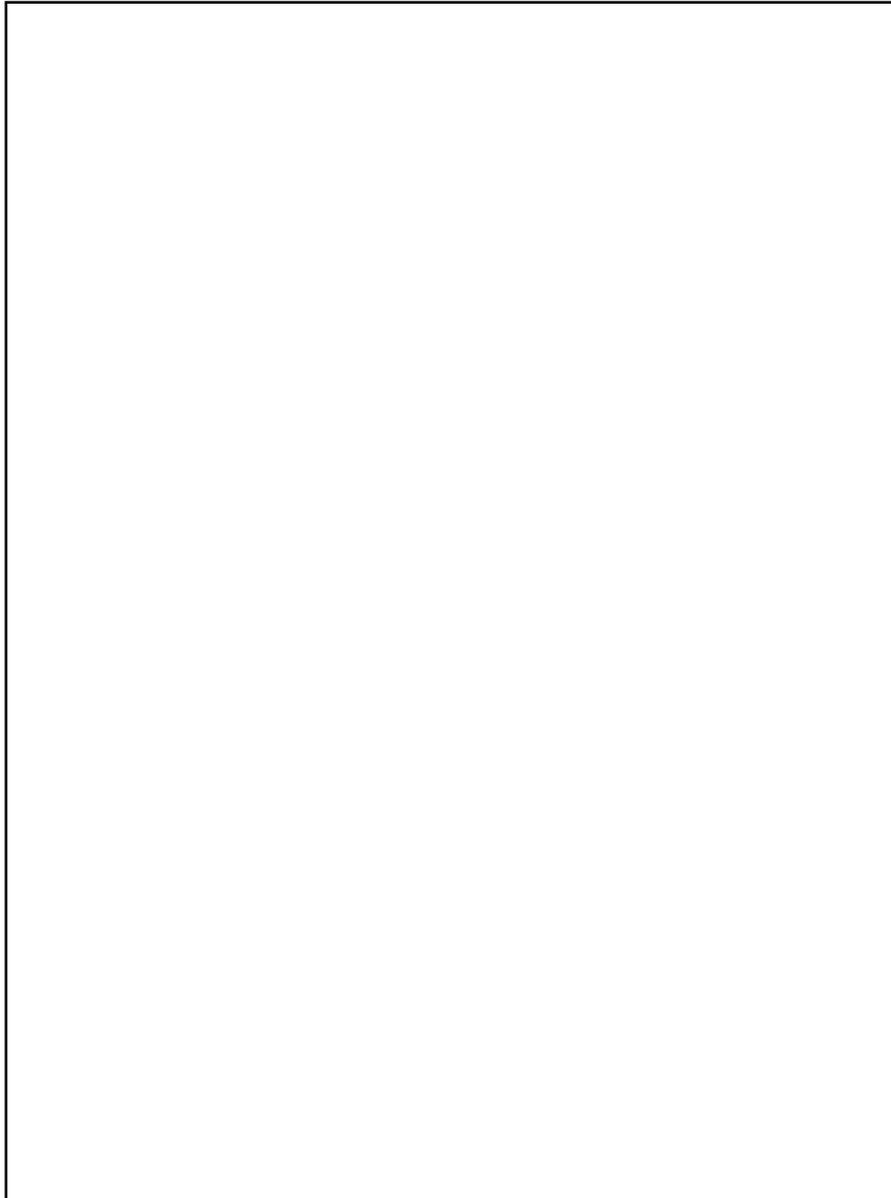
Issue Code: 18.2

As noted by the commentor, the Executive Summary of the EIS states that the 25 to 30 million gallons of wastewater generated by the operation of the each year constitutes a moderate effect, and Table ES-3 finds that the waste management impacts of the operation of the NBAF are minor. This is not a contradiction. As shown on Table 3.13.2.2-1 in Section 3.13.2.2 of the EIS, the volume of sterilized wastewater arising from waste management operations ranges between 44% and 56% of the estimated NBAF total wastewater generation rate, depending on facility location. The rest of the wastewater that will be generated by the facility (non-sterilized wastewater and cooling tower blowdown) is not directly related to waste management.

Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As shown on the table, all of these technologies produce non-infectious residuals. 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. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4 of the EIS (Air Quality) assumes that the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse effect. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 of the EIS (Infrastructure) assumes that alkaline hydrolysis will be used to assess the maximum sanitary sewage impacts.

Comment No: 6

Issue Code: 19.2



DHS notes the commenter's statement. The "negligible" effect for Health and Safety is for normal operations (incident-free conditions and those abnormal conditions that frequency estimation techniques indicate occur with a frequency greater than 0.1 events per year) and is correct. The moderate risk factor was applied to sites in the risk assessment included in Section 3.14 of the NBAF EIS. The application of the risk rank is applied to the potential for an accident to occur and the magnitude of the consequences of an accident.

Prescott, Kathy

Page 4 of 4

WD0459

1 cont.
26.0

potential easy spread of a disease through livestock or wildlife.

6 cont.
19.2

THE EXECUTIVE SUMMARY TABLE SAYS **NEGLIGIBLE** for Health and Safety.

Apparently, there is a distinction here where the subtitle of the Executive Summary Table reads: "Potential Adverse Effects for **NORMAL** Operations".

The DEIS is saying that if nothing happens - NOTHING HAPPENS! The implication in the Summary Table is that the **RISKS** to Health and Safety are **NEGLIGIBLE** and this impression is proven by the *Athens Banner-Herald* headline (from June 21, 2008 - one day after the DEIS was released) that reads:

RISK FROM BIOLAB NIL, FEDS CLAIM

Obviously, the reporter had not had time to read the entire 1,000 page document and relied on this VERY MISLEADING EXECUTIVE SUMMARY.

2 cont.
4.2

DHS through Dial Cordy may correct some of these errors, but the damage has been done. The Athens area community has no opportunity to review those changes. We are left with a DEIS that the Connecticut Attorney General calls "profoundly deficient, and legally insufficient".

Prescott, Kathy

Page 1 of 10

WD0741

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Monday, August 25, 2008 2:13 PM
To: NBAFProgramManager
Subject: COMMENT: MISINFORMATION

Dear Mr. Johnson,

I submit this information as a COMMENT to be addressed in the NBAF FEIS.

Just yesterday I discovered the *FINAL SELECTION MEMORANDUM for Site Selection for the Second Round Potential Sites for the NBAF (dated July 2007)*. In it, Under Secretary Jay Cohen (the Selection Authority) finds that:

"The Georgia Consortium for Health and Argo-Security appears to have garnered strong community support which is a significant strength". "The consortium has also established comprehensive outreach and communications plans to foster strong community acceptance of the project, including a website."

THE LEVEL OF MISINFORMATION ABOUT NBAF GENERATED IN ATHENS, GA IS ASTOUNDING. A FEW EXAMPLES ARE EXCERPTED BELOW WITH LINKS TO FULL DOCUMENTS:

The Red and Black Posted: 4/3/06

Georgia bids for federal defense site

Study indicates facility would employ more than 1,000

By: CRISTEN CONGER

An economic impact study conducted by the University's Carl Vinson Institute of Government before the sites were chosen projected a \$3.5 billion to \$6 billion economic impact over 20 years from the facility. It would employ 500 federal workers as well as providing more than 1,000 jobs.

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http://www.redandblack.com/home/index.cfm?event=displayArticlePrinterFriendly&uStory_id=5293bbcb-1732-4b7c-9525-4d09dc1b7be8

Athens Rotary Club Address

Holiday Inn · January 17, 2007
Michael F. Adams , President, University of Georgia

The University can use your help on one particularly

Comment No: 1 Issue Code: 27.0
 DHS notes the information provided by the commentator.

1/27.0

Prescott, Kathy

Page 2 of 10

WD0741

significant opportunity – our application to host the National Bio and Agro-Defense Facility, or NBAF. As you probably know, the federal government has solicited bids for a facility dedicated to the nation's defense against threats from biological terrorism or attacks on our food supply. UGA has made the first cut, and we're excited about that. It is not an overstatement to say that NBAF could transform this community in terms of economic development. Construction of the 500,000-square-foot facility would **create some 1,000 jobs**. Initially, **the facility will employ 500** people in very high-paying positions, with an estimated **1,200 additional jobs** created in the community as a result of NBAF's being here. The Vinson Institute has estimated that the **20-year economic impact to be as much as \$2.5 billion in salaries and \$3.5-\$6 billion in total economic impact.**

1|27.0
(cont.)

Mull over those numbers. Six billion dollars. 1,700 jobs.

Here's what you can do: Become a supporter of our NBAF proposal. One of the factors on which the decision will be made is community support. What we need is strong, vocal support for the proposal. Pat Allen and David Lee, our vice president for research, will be happy to provide you with any information you need in order to become an informed advocate. As the process moves forward this year, there will likely be public hearings, conducted by the Department of Homeland Security, and we would appreciate your presence at those.

<http://www.uga.edu/presofc/pdfs/speeches/Rotary2007.pdf>

Focus on key poultry lab as UGA hatches big biodefense goals Boost to research, area economy

By Lee Shearer | lee.shearer@onlineathens.com | Story updated at 11:49 PM on Sunday, February 18, 2007

University of Georgia administrators are stepping up a campaign to sell locals on the benefits the National Bio- and Agro-Defense Facility would bring to Athens.

But having the National Bio- and Agro-Defense Facility, or NBAF, here would make the state and Athens "a world leader in protecting our health and the economy," according to UGA's Vice President for Research, David Lee.

Lee last week started a series of public meetings designed to build community support for bringing the huge NBAF building to Athens.

His first stop was a Tuesday talk at the weekly meeting of the Athens Kiwanis Club.

Because researchers in the NBAF building will work with some of the world's most dangerous zoonotic diseases, the building must be engineered so that West Nile virus, Ebola virus and other deadly agents can't escape from the labs where scientists are trying to develop vaccines or understand better how an enemy might use them in a terrorist act.

The NBAF could have an enormous economic benefit for the area, Lee said. UGA officials estimate the building not only would employ 500 workers in well-paid jobs, but indirectly lead to the creation of hundreds more jobs, pumping as much as \$6 billion into the Athens-area economy over 20 years.

Prescott, Kathy

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WD0741

Published in the Athens Banner-Herald on 021807

http://onlineathens.com/stories/021807/uganews_20070218068.shtml

2|26.0

IN JULY 2007, WHEN MR. COHEN GAVE ATHENS, GA A SCORE OF 90 (EXCELLENT) FOR COMMUNITY ACCEPTANCE, THOSE WHO KNEW ABOUT THE NBAF PROJECT HAD BEEN MISINFORMED, WHILE THE MAJORITY OF THE ATHENS COMMUNITY KNEW NOTHING WHATSOEVER ABOUT THE FACILITY. THEREFORE, THE SCORE OF 90 IS BOGUS AND NOT REPRESENTATIVE OF THE FACTS.

COMMUNITY ACCEPTANCE FOR NBAF ON SOUTH MILLEDGE AVENUE WAS NOT THEN AND WILL NOT BE ACHIEVED IN ATHENS,GA.

Respectfully submitted,
Kathy Prescott
Co-Founder, *FAQ,inc.*
For Athens Quality-of-life

Comment No: 2

Issue Code: 26.0

DHS notes the commentor's statement. Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 23 public meetings have been held in the vicinity of NBAF site alternatives and in Washington D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered DHS has also provided fact sheets, reports, exhibits, and a Web page (<http://www.dhs.gov/nbaf>). Additionally, various means of communication (mail, toll-free telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance.

Prescott, Kathy

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WD0741

Georgia bids for federal defense site

Study indicates facility would employ more than 1,000

By: CRISTEN CONGER

Posted: 4/3/06

If Georgia receives the bid for a National Bio- and Agro-Defense Facility, it would be located on one of two proposed sites on the University campus.

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(cont.)

The facility would make the University and Athens-Clarke County "key contributors" in fighting terrorism in the United States on the macro level, University spokesman Tom Jackson said.

The federal facility would be a research hub within the Department of Homeland Security to study emerging disease pandemics and bio- and agro-terrorism.

"It would greatly enhance the reputation and capacity of UGA as a major research institution," Jackson said.

The two sites are University-owned land off of College Station Road near several research facilities, and South Milledge Avenue near Whitehall Road.

The group that drafted the proposal, which included University representatives, chose the sites because of related research at the University and its proximity to facilities like the College of Veterinary

Medicine and the Southeast Poultry Research Laboratory, said Bert Brantley, communications manager for the Georgia Department of Economic Development.

The facility would provide a number of opportunities for University research collaboration much like the relationship between Emory University and the Centers for Disease Control and Prevention in Atlanta, Jackson said.

"I think the sky's the limit," he added.

An economic impact study conducted by the University's Carl Vinson Institute of Government before the sites were chosen projected a \$3.5 billion to \$6 billion economic impact over 20 years from the facility. It would employ 500 federal workers as well as providing more than 1,000 jobs.

The facility would create a "ripple effect" economically, Brantley said. Since the doctoral-level research jobs would be high-paying, more disposable income would come into the city.

Texas, Mississippi and a partnership between Kentucky and Tennessee also submitted proposals, which were due Friday.

Brantley said he felt Georgia made a good case.

There is no set date for when the Department of Homeland Security will announce where the facility will be located, but Brantley said no one will know anything for at least 45 days.

Prescott, Kathy

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WD0741

Athens Rotary Club Address

Holiday Inn · January 17, 2007

Thank you for this annual opportunity to speak with you about the relationship between the University of Georgia and our host community. It is my sense that town-gown relations were quite good in 2006. Let me share with you some of the ways that the university and the city worked together.

We cooperated on a number of significant projects, none more important than Partners For a Prosperous Athens. UGA was one of the co-conveners of this group, which is so ably led by Rotarians Steve Jones and Red Petrovs. Art Dunning, UGA's vice president for public service and outreach, has played a leadership role in connecting our resources with the program. In coming together to address a problem that impacts everyone in this community, we are living the Rotary motto of "Service Above Self."

It has been heartening to see the turnout for the various Partners hearings and meetings. Athens is rich in resources – the campus and the community, the people, the intellectual capital – and complex issues require comprehensive solutions. I am confident that we are on the path toward significant improvement in the quality of life for all Athenians.

We agreed to work together on the construction of a new wastewater treatment plant on the Middle Oconee River, near East Campus. UGA will help with the cost of a bridge to the site of the new plant, which will also provide access to the Harden property we recently purchased.

This is one of those win-win situations: The new plant will be more efficient and, frankly, less smelly. The university gains access to property which can currently be accessed only through a neighborhood. Access to that property allows us to plan for future space and facility needs.

The final stage – thankfully! – of the Lumpkin Street project began last week. This, too, has been a cooperative project. While the city bore most of the financial responsibility, the university has provided some property, some technical assistance and the construction and maintenance of the rain gardens, which direct rainwater away from the storm water system. It's a relatively simple, environmentally-friendly way to manage excess water in the streets.

The Lumpkin Street project tops off a trio of streetscape projects we have completed with Athens-Clarke County, with the Baldwin and Baxter Street projects improving pedestrian safety and traffic flow.

Our joint effort to increase the use of the two bus systems continues to work well, reducing the number of cars on the streets and offering convenient alternatives to people both on and off campus. As you may recall, UGA students, faculty and staff can ride the city buses for free, and the university's a lump-sum payment to Athens Transit. One reason that requests for parking permits on campus have actually decreased over recent years is that our students, faculty and staff have discovered this convenient and economical alternative to driving to campus.

There will be great opportunities for further cooperation in the coming months and years, particularly in the area of economic development. This region has all the necessary resources to be attractive to the kind of high-tech, biotechnology industries that we want here. We need a strategy that involves all the players – the local government, the University of Georgia, Athens Tech, the state government – in order to capitalize on the opportunities that will come our way.

We came close last year, and there is another opportunity in play today, and there will be more in the future. As the cliché goes, it's a marathon, not a sprint, but what is at the finish line is worth the struggle.

The University can use your help on one particularly significant opportunity – our application to host the National Bio and Agro-Defense Facility, or NBAF. As you probably know, the federal government has solicited bids for a facility dedicated to the nation's defense against threats from biological terrorism or attacks on our food supply.

UGA has made the first cut, and we're excited about that. It is not an overstatement to say that NBAF could transform this community in terms of economic development. Construction of the 500,000-square-foot facility would create some 1,000 jobs. Initially, the facility will employ 500 people in very high-paying positions, with an estimated 1,200 additional jobs created in the community as a result of NBAF's being here. The Vinson Institute has estimated that the 20-year

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(cont.)

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Athens Rotary Club Address

Holiday Inn · January 17, 2007

economic impact to be as much as \$2.5 billion in salaries and \$3.5-\$6 billion in total economic impact.

Mull over those numbers. Six billion dollars. 1,700 jobs.

Here's what you can do: Become a supporter of our NBAF proposal. One of the factors on which the decision will be made is community support. The other factors are research capabilities, where UGA is very strong and has alliances with Tech, Emory, the CDC, MCG and other agencies which strengthen the capability to do this research; workforce, which is an area where Georgia has improved substantially in recent years; and acquisition, construction and operations, or essentially the ability to build and manage the facility – again, an area where Georgia has great strength.

What we need is strong, vocal support for the proposal. Pat Allen and David Lee, our vice president for research, will be happy to provide you with any information you need in order to become an informed advocate. As the process moves forward this year, there will likely be public hearings, conducted by the Department of Homeland Security, and we would appreciate your presence at those.

You have read about our proposal for a Health Sciences Campus on the Navy School property. We are grateful that the Governor included \$3.8 million in his budget for the expansion of the Medical College of Georgia's programs in Athens.

I want to be sure you understand that this is not just a significant opportunity for the University of Georgia. It is also a chance for Athens to be at the center of Georgia's battle with some serious public health challenges.

Teaming up with the clinical staff at the Medical College of Georgia, the academic programs of Athens Technical College and the two local hospitals will provide here in Athens a public health campus that promises to have a significant positive impact on the quality of life in our state. I believe that 50 years hence, the creation of the UGA Health Sciences Center will be seen as one of this state's most important public policy moves of the 21st century.

These opportunities – NBAF, the Navy School property, biotech development along 316 and the Orkin tract – are as exciting as any in my 10 years at UGA.

I want to brag about our students and the positive impact they have as volunteers in this community. Some of you may have read the story in the Banner-Herald a few weeks ago about the difficulty some local social service organizations have serving their clients when the University is on holiday, because so many UGA students serve as volunteers in those organizations.

Trudy Bradley, coordinator of the Clarke County Mentor Program, says there are 448 UGA students registered as mentors. If they meet only the minimum requirement of one hour per week with their young students, that's 2,740 hours per month – and I am confident that many of them spend much more than just an hour a week with their students.

This is what she had to say about the UGA students who serve as mentors: "Their enthusiasm is boundless, their dedication to their mentees is unbelievable, their sense of responsibility shows maturity beyond their years, and their desire to help others is an example we should all follow."

"The mentor program is blessed to have UGA students working with us. And I am blessed, personally. They are MY mentors as well as the young people with which they work....they make ME a better person just by the examples they set."

More than 1,200 UGA students subscribe to a weekly e-mail service which lists volunteer opportunities coordinated through Volunteer UGA, a department of our student affairs office. More than 800 students have volunteered with community service agencies, and 150 UGA students applied to the Big Brother/Big Sister program this year.

The Alternative Spring Break program, in which UGA students use the break to volunteer in service to others, has 12 sites set up this year, from Washington, DC to Chattanooga to Mobile to Port Saint Joe. There were 360 applications for the 150 spots available. And UGA students organized the first campus-based Relay for Life, which this year involves some 500 students.

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Prescott, Kathy

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Athens Rotary Club Address

Holiday Inn · January 17, 2007

These are good kids doing good work on their own time for this community, and I am proud of them.

In closing, an update on our plans for enrollment and facilities. There are no plans at present for any significant increase in enrollment here in Athens. There may be, in the coming years, some adjustment in the enrollment mix between undergraduate and graduate students as we evaluate those programs. (As a point of reference, most major public research universities have an undergraduate to graduate ratio of 2:1; at UGA, we are closer to 3:1.)

By agreement with the Regents, our enrollment target for the main campus is 32,500, with a two percent variance. With about 32,800 students on the Athens campus and about 1,100 others at Gwinnett, Griffin and Tifton, we are within that range and plan to stay there.

We will expand our graduate programs in Gwinnett County and the undergraduate programs in Griffin and Tifton.

As I have told you before, any significant increase in enrollment in Athens, in addition to a policy change, would require hundreds of millions of dollars in infrastructure spending on the part of the state.

If you have been on campus recently, you have probably seen the two major construction projects currently under way: the practice facility for men's and women's basketball and women's gymnastics adjacent to Stegeman and the construction of the new home of the Lamar Dodd School of Art on East Campus.

The new art school will bring together departments which are literally scattered across campus in a facility befitting the legacy of its namesake. The project is on schedule for completion in the spring of 2008. The practice facility should be completed this summer.

On the horizon are an expansion of the College of Pharmacy building, which will help us meet Georgia's critical need for pharmacists and which the Governor also included in his budget; the construction of a Special Collections Library on Hull Street; and an expansion of the Georgia Museum of Art.

Finally, we will see movement this year on the expansion of the Tate Student Center, beginning with the construction of a parking deck in the Tate lot. The Tate expansion will be built on top of the deck.

In every sense, the fate of UGA and the fate of Athens are intertwined. I like living in Athens and entertaining at the President's House. My wife owns a house here. I am a taxpayer and I am invested in this community. Athens is my home.

Likewise, the University of Georgia bears a statewide responsibility as the flagship institution of the University System of Georgia. The land-grant mission charges us to teach, to conduct research and to serve the people of the state by connecting the resources of the university with them. We must balance our responsibilities as a citizen of Athens-Clarke County with an historic responsibility to the entire state.

As I said in last week's State of the University address, ultimately what is best for the state has to be our priority - and I believe that what is best for the state is what is best for Athens as well.

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Prescott, Kathy

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WD0741

Focus on key poultry lab as UGA hatches big biodefense goals Boost to research, area economy

[Story Photos - Click to Enlarge](#)

White leghorn chicks, about 3 to 4 weeks old, walk under lights at the Southeastern Poultry Research Laboratory. The facility off College Station Road is aging, but President Bush has proposed spending \$16 million to plan and design a new building. The lab is home to the main U.S. research program on avian influenza, the bird flu virus many scientists fear could evolve into a deadly worldwide pandemic.

Melissa Golden/Staff

By Lee Shearer | lee.shearer@onlineathens.com | Story updated at 11:49 PM on Sunday, February 18, 2007

University of Georgia administrators are stepping up a campaign to sell locals on the benefits the National Bio- and Agro-Defense Facility would bring to Athens, but the city already is home to a similar high-security research lab.

And, while it's far from certain that the federal government will choose Athens over the other dozen cities vying for the defense research center, the feds are poised to rebuild the Southeastern Poultry Research Laboratory and invest millions in the Athens economy.

The poultry research lab is increasingly important for national security, but its buildings are showing their age, according to its director, David Swayne.

President Bush's proposed federal budget for the 2008 fiscal year includes \$16 million to plan and design a new building for the poultry lab on College Station Road.

The poultry laboratory is famous among medical scientists around the world. Its scientists played a large role when researchers reconstructed the 1918 flu virus that killed between 50 million and 100 million people worldwide

And it now houses the main U.S. research program on avian influenza - the bird flu virus that many scientists fear could evolve to kill millions of people in a worldwide pandemic.

Housed in 30 buildings off College Station Road, the poultry lab also is one of the most biosecure buildings in the United States, designed and built so that none of the potentially dangerous viruses and bacteria used in the lab can ever escape to wreak havoc in the outside world.

But the poultry lab is growing old. It's too costly to operate and it's too small, Swayne said.

When construction on the poultry lab started in 1960, the facility was designed for 20 people. But now, 65 work in the lab complex on College Station Road. It's too small, and nearing the end of its useful life, Swayne said. In addition, the U.S. Department of Agriculture, which operates the lab, also plans to close down a smaller lab in Michigan and bring its 15 jobs to Athens, Swayne said.

Planners haven't set a budget or a definite schedule for the new lab's construction, Swayne said. Congress hasn't yet approved the planning money, much less the construction money.

Typically, however, design and budget costs are about 10 percent of a construction project, he said, - which means the project could cost around \$160 million.

By contrast, the most expensive building to date on the University of Georgia campus is the Animal Health Research Center, or AHRC, another biosecure lab building that cost \$42 million.

Gathering support

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(cont.)

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The AHRC and the poultry lab already have helped UGA recruit top disease researchers to Athens. But having the National Bio- and Agro-Defense Facility, or NBAF, here would make the state and Athens "a world leader in protecting our health and the economy," according to UGA's Vice President for Research, David Lee.

The 552,000-square-foot NBAF is intended to meet the nation's need for a research and development laboratory to confront threats from emerging disease pandemics or bio- and agro-terrorism. The huge NBAF, which will be part of the U.S. Department of Homeland Security, would include state-of-the-art biosafety laboratories where scientists can research and develop diagnostic capabilities for foreign animal and zoonotic diseases (diseases that can be passed between animals and humans).

With the Southeastern Poultry Research Laboratory and UGA's Animal Health Research Center, NBAF would give Athens three of the world's most biosecure buildings - and probably the largest concentration of top researchers in infectious animal diseases in the United States, Swayne said.

Lee last week started a series of public meetings designed to build community support for bringing the huge NBAF building to Athens.

His first stop was a Tuesday talk at the weekly meeting of the Athens Kiwanis Club.

"We will schedule meetings with other community groups as requested in the coming months," said Terry Hastings, a spokeswoman for the vice president for research office.

UGA also has launched a Web page - www.uga.edu/nbaf - with information about the proposed NBAF and why UGA is trying to persuade the Department of Homeland Security to build it here.

Because researchers in the NBAF building will work with some of the world's most dangerous zoonotic diseases, the building must be engineered so that West Nile virus, Ebola virus and other deadly agents can't escape from the labs where scientists are trying to develop vaccines or understand better how an enemy might use them in a terrorist act.

The NBAF will be one of the most biosecure buildings in the world, Lee said.

It also would be one of the largest buildings in Athens. At 552,000 square feet, it will be about 25 percent bigger than UGA's 420,000-square-foot Ramsey Student Center, and more than twice the size of the 200,000-square-foot Student Learning Center.

UGA is the lead school in a consortium of state universities, along with Atlanta's Centers for Disease Control and Prevention, vying to bring the NBAF to Athens, but what city lands the mammoth building is very much undecided, Lee told the Kiwanians.

UGA has offered two large tracts of land for the facility. One is off College Station Road, adjacent to the Southeastern Poultry Research Laboratory; another is near the intersection of Whitehall Road and South Milledge Avenue.

Homeland Security officials are considering proposals for 18 sites. Finalists will be announced in June, with final site selection in next October. The building would become operational in 2013 or 2014, according to the Department of Homeland Security schedule.

Economic boost

Athens can make a strong case for building NBAF here, Lee said.

UGA nearly is finished building its own high-biosecurity lab, the School of Veterinary Medicine's Animal Health Research Center, or AHRC.

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(cont.)

Prescott, Kathy

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WD0741

Outside regulators are evaluating the building's highest-security labs, which should be fully operational in six to 12 months, Lee said.

The building already has helped UGA to attract top researchers in vaccine development and other infectious diseases, according to UGA administrators.

Athens already has "one of the world's largest concentrations" of poultry medicine researchers, at the poultry lab and Merial, an animal health products company with a "world class vaccine development" program, he said.

"We have a near-perfect context," Lee told the Kiwanis Club.

The NBAF could have an enormous economic benefit for the area, Lee said. UGA officials estimate the building not only would employ 500 workers in well-paid jobs, but indirectly lead to the creation of hundreds more jobs, pumping as much as \$6 billion into the Athens-area economy over 20 years.

1|27.0
(cont.)

Having NBAF here also could make UGA and Athens a world leader in research into some of the world's most troubling diseases, said Ralph Tripp, a Georgia Research Alliance Eminent Scholar in animal vaccine development.

"Research-wise, it would clearly demarcate Georgia as a primary facility in the United States for infectious disease research," Tripp said.

Already, UGA's \$40 million, 75,000-square-foot AHRC building has drawn high-level researchers and attracted interest from big companies looking to get involved with scientists doing research in the building, Tripp said.

For scientists like Tripp and Swayne, the poultry lab director, the most exciting aspect of NBAF in Athens may be the researchers it would bring to town, however.

"For me, it offers a great opportunity to interact with some of the world's greatest scientists," Tripp said. "For me, it's a big deal."

Published in the Athens Banner-Herald on 021807

Prescott, Kathy

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WD0478

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Friday, August 22, 2008 11:27 AM
To: NBAFProgramManager
Cc: Director@athensfaq.org
Subject: Re: NBAF DEIS (bounding number) QUESTION

I'll just type it then. I hope this comes through. Would you let me know please?

PLEASE CONSIDER THIS A COMMENT TO BE ADDRESSED IN THE NBAF FEIS IF YOU WILL NOT IN FACT ANSWER MY QUESTION NOW.

Thank you,
 Kathy Prescott

Dear Mr. Johnson,

I have a question that I did not get an opportunity to ask you when you were here in Athens since we both were very busy. This is not a comment but a question that will help me better formulate my comments for the record.

This table is located on page E-19 of the NBAF DEIS. The paragraph above it reads:

The NBAF facility will utilize a standard pen size designed around the use of large animals at 144 square feet for flexibility. The standardization to one size will allow the facility to accommodate more animals at lower weight ranges as long as the weight of an individual does not exceed the minimum required by the National Research Council guide. From the Feasibility Study, the following table gives an approximate bounding number of animals in the NBAF.

The table is a breakdown of animal sizes by weight and species in BSL-3Ag labs and BSL-4 labs.

LARGE COWS (up to 1,430 lbs.)
 138 in BSL-3Ag and 28 in BSL-4 = 166
 MEDIUM COWS (up to 730 lbs.)
 276 in BSL-3Ag and 56 in BSL-4 = 332
 SMALL COWS (up to 440 lbs.)
 414 in BSL-3Ag and 84 in BSL-4 = 498
 SWINE
 798 in BSL-3Ag and 196 in BSL-4 = 994
 SHEEP
 912 in BSL-3Ag and 224 in BSL-4 = 1,136

Does "approximate bounding number" mean that the maximum number of animals in NBAF at any one time could be a SUM of the above (166 + 332 + 498 + 994 + 1,136) equalling 3,126 animals? In other words, is 3,126 animals an "NBAF full house"? What is the meaning of "bounding number"? Or am I misreading this information?

THIS INFORMATION IS VERY CONFUSING. HOW ARE WE TO DETERMINE THE AMOUNT OF WASTE GENERATED THAT WILL REQUIRE TREATMENT, THE CARCASS DISPOSAL VOLUME, LET ALONE THE METHOD OF THAT DISPOSAL? HOW ARE WE TO DETERMINE THE NEGATIVE EFFECTS ON ATHENS AIR QUALITY AND THE BURDEN ON OUR WASTE

Comment No: 1 Issue Code: 23.0

DHS notes the commentor's question. As described in Section 2.2.1 of the NBAF EIS, the number of animals that could be housed at the NBAF at any given time is 200-300, depending on the size of the animals and based on 70% utilization of the design maximum. The numbers cited by the commentor from Appendix E represents number of animals that could potentially be housed for research in the facility within a one year period.

Comment No: 2 Issue Code: 18.0

DHS notes the commentors concern regarding the amount of waste that could be generated by the NBAF. Table 3.13.2.2-1 in Section 3.13.2.2.2 presents estimates of the average and maximum daily wastewater generation rates at each of the candidate sites. As discussed in this section, wastewater generation rates will be influenced by a number of factors including the carcass disposal methodology chosen for the facility and the type of system used for room decontamination. (For example, the use of gas for room decontamination would result in a lower volume sanitary sewer waste stream.) The estimates on Table 3.13.2.2-1 are worst case.

The volume of municipal (i.e., sanitary) solid waste and special medical waste that could be generated by the NBAF is estimated at approximately 15,592 cubic yards or 13,134 tons per year. As shown on Table 3.13.2.1-1, the State of Georgia currently generates approximately 10.6 million tons of municipal solid waste per year and it is a net importer of municipal solid waste. Using these figures, the NBAF would generate less than 1/10 of 1 percent of the total of amount of municipal solid waste generated in Georgia each year. The number of carcasses euthanized each year at the NBAF is estimated to be between 375 and 1,200. The liquid and solid wastes produced by the carcass disposal methodologies being considered are already represented in the numbers presented above. Section 3.13.4 presents the waste management impacts of the construction and operation of the NBAF at the South Milledge Avenue Site.

Comment No: 3 Issue Code: 9.2

DHS notes the commentor's concern for air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3. Carcass/pathological waste disposal, including incineration, is discussed in Section 3.13. Air pollutant concentrations were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards.

1| 23.0

2| 18.0

3| 9.2

Prescott, Kathy

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WD0478

4| 18.2 | **TREATMENT FACILITIES IF THE MEANS AND THE AMOUNT ARE NOT MADE CLEAR?**

Your response would be greatly appreciated.

Thank you,

Kathy Prescott
Co-Founder FAQ, inc.
For Athens Quality-of-life

On Aug 21, 2008, at 2:43 PM, NBAFProgramManager wrote:

[Still looks like it was cut off – is there additional text that is missing?](#)

Thank you,
NBAF Program Manager

From: Kathy Prescott [<mailto:preskat@bellsouth.net>]
Sent: Thursday, August 21, 2008 1:00 PM
To: NBAFProgramManager
Cc: director@athensfaq.org
Subject: NBAF DEIS (bounding number) QUESTION

Dear Mr. Johnson,

I have a question that I did not get an opportunity to ask you when you were here in Athens since we both were very busy. This is not a comment but a question that will help me better formulate my comments for the record.

This table is located on page E-19 of the NBAF DEIS. The paragraph above it reads:

The NBAF facility will utilize a standard pen size designed around the use of large animals at 144 square feet for flexibility. The standardization to one size will allow the facility to accommodate more animals at lower weight ranges as long as the weight of on individual does not exceed the minimum required by the National Research Council guide. From the Feasibility Study, the following table gives an approximate bounding number of animals in the NBAF.

Comment No: 4

Issue Code: 18.2

Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (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. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4. of the EIS (Air Quality) assumes that the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse effect. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 of the EIS (Infrastructure) assumes that alkaline hydrolysis will be used to assess the maximum sanitary sewage impacts. Section 3.13.4.3 of the NBAF EIS addresses the operation consequences of waste management at the South Milledge Avenue Site.

Prescott, Kathy

Page 1 of 3

WD0611

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Saturday, August 23, 2008 4:07 PM
To: NBAFProgramManager
Cc: director@athensfaq.org
Subject: COMMENT: Athens/Clarke County AIR QUALITY in VIOLATION

Dear Mr. Johnson,

19.2 Please accept this Atlanta Journal-Constitution article as a NBAF DEIS COMMENT. It further describes the air quality challenges SPECIFIC to ATHENS/CLARKE COUNTY GEORGIA that were NOT addressed in the DEIS and should be addressed in the FEIS.
ATHENS/CLARKE COUNTY IS IN VIOLATION OF THE NEW EPA STANDARDS.

Respectfully submitted,

Kathy Prescott
 Co-Founder, *FAQ, inc.*
 For Athens Quality-of-Life

ajc.com > [nation/world](#)

EPA tightens ozone limits; 14 Ga. counties in violation

Cobb, DeKalb, Fulton, Gwinnett among those that won't meet new standards

By [CHRISTIAN BOONE](#), [STACY SHELTON](#), [DAVID MARKIEWICZ](#)

The Atlanta Journal-Constitution

Published on: 03/12/08

In a decision criticized by both environmental activists and business concerns, the Bush administration on Wednesday imposed stricter ozone limits affecting air quality in Atlanta and other cities.

Even under the old standards — allowing for a maximum concentration of .08 to .084 parts per million units of ozone, a component of smog — metro Atlanta's air was considered hazardous to public health.

The new Environmental Protection Agency mandate is .075 parts per million. Nationwide, 345 counties — including Cobb, DeKalb, Fulton, Gwinnett and 10 others in Georgia — will fail to meet the new standard.

One immediate consequence is that Atlantans can expect more smog alerts.

Metro Atlanta violated the old standard 29 days in 2007. The new requirements could place the area in violation every other day during the summer — meaning, on the worst days, more Air Quality Index warnings for people to avoid outdoor physical activity.

Comment No: 1 Issue Code: 9.2

DHS notes the information submitted by the commentor. The NBAF EIS Section 3.4.3 describes potential site specific air quality affects at the South Milledge Avenue Site and the new 8 hour ozone standard was included.

Prescott, Kathy

Page 2 of 3

WD0611

"Clearly, the EPA and the executive branch were lobbied pretty heavily by industrial groups," said Brian Gist, an attorney with the Southern Environmental Law Center. "This continues a pattern of unwillingness by this administration to make the hard decisions required to ensure clean air."

Gist said he was disappointed that EPA Administrator Stephen Johnson rejected suggestions by an independent panel of scientists and public health experts to allow ozone concentrations of no more than .070 parts per million.

Business interests had argued against lowering the standard at all.

"The costs are too high and the benefits too unclear to impose this new burden on America's manufacturers and employees," said John Engler, president of the National Association of Manufacturers. "Anyone interested in preserving high-paying U.S. jobs in manufacturing and keeping a lid on energy prices should be disappointed in today's ruling."

Johnson told Congress last year that the impact of ozone is more harmful than previously believed. He has said that existing air quality standards, dating to 1997, were not stringent enough. More than half of the U.S. population, including more than 4 million metro Atlantans, lives in areas whose summertime air is considered hazardous by the EPA.

Already struggling to meet the old ozone standards, the state will now have to find ways to meet the new directive. **These Georgia counties are in violation of the new EPA standards:** Bibb, Athens-Clarke, Cobb, Coweta, DeKalb, Douglas, Fayette, Fulton, Gwinnett, Henry, Murray, Paulding, Richmond, Rockdale.

Expect tougher regulations for coal-fired power plants, engines and fuels, as well as bans on outdoor burning and other controls. Heather Abrams, chief of the Air Protection Branch of the state Environmental Protection Division, said one area that can improve is diesel-powered vehicles and rail yards

Individual communities would have to submit their plans to meet the new standard. Failure to meet them could lead to a loss of federal funds.

Scientists lists ozone among the most harmful air pollutants. A gas created by a chemical reaction, it can be found in the stratosphere high above the earth, or at ground level.

At high altitudes, the substance, often called "good ozone," occurs naturally and forms a protective layer that helps block potentially harmful ultraviolet rays.

At ground level, the so-called "bad ozone" arising from motor vehicle emissions, factories and chemicals solvents is a component of smog and can be unhealthy, especially in warmer and sunny weather.

Ground-level ozone can increase the likelihood of respiratory illnesses including bronchitis and pneumonia, worsen an asthmatic condition and harm lungs, studies have shown. It especially threatens children and the elderly.

Prescott, Kathy

Page 3 of 3

WD0611

The EPA, as required under the Clean Air Act, established national air quality standards for six air pollutants including ozone to protect the public and environment. The law also requires the agency to review and, if necessary, change those standards.

The agency was under court order to review its standard for ground-level ozone by Wednesday.

Communities violating the new standard will be required to install tighter pollution controls, including cleaner-burning gasoline and yearly vehicle emissions tests.

An EPA analysis of the proposed standards concluded that reducing smog nationally could cost as much as \$3.9 billion annually to pay for cleaner gasoline, cleaner vehicles and industrial pollution controls. Most of that would be spent in eastern states, including Georgia.

The study said reductions in pollution could save as many as 5,400 lives a year in the U.S. by 2020.

— The Associated Press contributed to this article.

More on ajc.com

Prescott, Kathy

Page 1 of 2

WD0406

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Wednesday, August 20, 2008 12:44 PM
To: NBAFProgramManager
Cc: director@athensfaq.org
Subject: COMMENT: Visual Quality/Impact

Re: VISUAL QUALITY / IMPACT - NBAF on South Milledge Avenue, Athens, GA



Cow Pond on Whitehall, Oil on Canvas
 (South Milledge Avenue Site looking West from Whitehall Road - note the grassy knoll, proposed site of the main NBAF building)

Dear Mr. Johnson,

1|7.2 I strongly disagree with the characterization of the South Milledge Avenue site as merely "RURAL". This site should have been designated "UNIQUE / DISTINCTIVE" and I'll tell you why.

The DEIS defines Unique/Distinctive as a landscape that "exhibits distinctive and memorable visual features and patterns". This South Milledge Avenue site certainly fits that description. This section of South Milledge Avenue is famous around here for it's unique beauty. When there is a particularly spectacular full moon expected, or an especially lovely sunset is underway, many people head to this area of open landscape to appreciate the wonders of our world. So few vistas are left for us that have not been paved over. Nighttime lighting has disrupted many opportunities to view the night sky. South Milledge Avenue at Whitehall is one of our last places of such beauty.

To illustrate my point about this site's uniqueness, I am including a photograph of a painting that I own of this South Milledge Avenue site. Done by a local artist, it was offered at auction seven or eight years ago (much before NBAF) during a fundraiser for the Georgia Museum of Art here in Athens. First, the site captured the imagination of the artist enough for him to choose that location for the subject of his oil painting. Second, the Georgia Museum valued this work of art enough to offer it, among others, as a distinctive subject appropriate to an

Comment No: 1 Issue Code: 7.2
 DHS notes the commentor's statement.

Prescott, Kathy

Page 2 of 2

WD0406

1 cont. | Athens audience that would understand and recognize it's importance as one of our few
7.2 | remaining beautiful vistas.

As an artist myself, I see the formal aspects of this site's features that make it beautiful, unique and distinctive. As the DEIS definition states, landform and open space combine in special ways to make a particular landscape appealing to the eye. Vividness is defined as the "visual power or memorability of landscape components". What makes this particular landscape memorable may be the way light falls along an expanse of pasture. It may be the color contrast between red clay and green trees. It may be the reflective quality of water mirroring the sky. It may be the long view across a great distance that affords the challenge of depiction of space. All these elements can combine to make a scene vivid in an artist's imagination. All these elements are there at this South Milledge Avenue site. It is a memorable piece of property because all these factors combine with time of day, or time of night, or atmosphere, or light and shade to cement this view in the mind's eye. I remember this painting but more importantly, I remember the site that inspired it. Others may recall a particular sunset over this expanse of pasture. Still others may remember moonlight across the rolling terrain.

The South Milledge Avenue site exhibits "INTEGRITY" as a "visual collection of the natural and man-made landscape and its freedom from encroaching elements". Pasture fencing and even site-appropriate out-buildings can lend integrity to a landscape. They can draw the eye toward beautiful landscape features without disrupting the entire pastoral setting. This site defines "VISUAL UNITY" - it has "visual coherence and compositional harmony of the landscape when considered as a whole". Pasture fencing is one thing. An enormous bio-containment facility (even an "aesthetically pleasing" one) with its attendant smoke stacks, water tanks, utility structures, parking lots - not to mention twenty-four hour lighting - is totally out of place, out of character, and completely DISHARMONIOUS with this location.

Since the DEIS chose simply "RURAL" to define the South Milledge Avenue site, the described VISUAL IMPACTS on the site are diminished. MANY residential and recreational viewers will be aware of visual changes at this site. NBAF would be prominent visually to patrons of the State Botanical Garden and University of Georgia facilities. VIEWER SENSITIVITY should therefore be considered HIGH. Even the Athens/Clarke County Corridor Management Strategy assesses the South Milledge Avenue/Whitehall Road area as a "SCENIC CORRIDOR". VISUAL IMPACTS should therefore be considered SIGNIFICANT.

2|5.2 | To destroy this UNIQUE and DISTINCTIVE property for the National Bio and Agro Defense Facility is abhorrent to me in the extreme. Please address this in the FEIS and add this comment to the many reasons to dismiss Athens, GA as a reasonable location for NBAF.

Respectfully submitted,

Kathy Prescott

Co-Founder FAQ, Inc.
For Athens Quality-of-Life

Comment No: 2

Issue Code: 5.2

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

Prescott, Kathy

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WD0405

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Wednesday, August 20, 2008 12:17 PM
To: NBAFProgramManager
Cc: director@athensfaq.org
Subject: COMMENT: Geology/bedrock

Dear Mr. Johnson,

1|11.2 | I'm including an article from our local Athens, GA newspaper from August 1999 about the Animal Health Research Center construction problems due to BEDROCK encountered on the construction site. Please note that the University is being accused of not disclosing the extent to which **blue granite bedrock** existed on the AHRC construction site. Why anyone would stand up at our last scoping meeting and remind people about the AHRC and it's "bumpy, 20-year history" is a mystery to me. It begs the question - why would UGA offer DHS a site for NBAF that is almost surely underlain by the same bedrock granite?

My question from the February Town Hall meeting held in Athens quoted from the *Phase 1 Environmental Site Assessment (dated 1/31/07)* of the South Milledge Avenue site: "... based on review of Georgia Department of Natural Resources geologic maps, it appears that the subject property is underlain by **feldspathic biotite gneiss**". That's GRANITE.

Since NBAF cost overruns seem to be a problem ALREADY, it makes no sense to ask for more. Since the NBAF project is so huge and a portion of the building as well as a large number of fuel storage tanks are to be underground, the proposed NBAF South Milledge Avenue site in Athens, GA is HIGHLY PROBLEMATIC due to the BEDROCK that exists in that area.

2|5.2 | Please consider this comment as a part of the NBAF DEIS, and add it to the MANY reasons that Athens, GA is NOT an appropriate site for the National Bio and Agro Defense Facility.

Respectfully submitted,

Kathy Prescott
 Co-Founder, FAQ, inc.
 For Athens Quality-of-life



Athens Daily News
 ATHENS BANNER HERALD
 Story last updated at 8:50 a.m. on Wednesday, August 25, 1999

Comment No: 1 Issue Code: 11.2

DHS notes the commentor's construction in bedrock concerns. The NBAF EIS Section 3.6.3 describes the South Milledge Avenue Site alternative's soil and geological conditions and Section 3.6.3.2 describes potential construction consequences. A detailed geotechnical report will be prepared once a site is selected and will be used in the NBAF's final design specifications including subsurface rock strata and construction implications.

Comment No: 2 Issue Code: 5.2

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

Prescott, Kathy

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WD0405

Contractors asking for more money from UGA

By Joan Stroer
Staff Writer

Budget cuts, delays and complaints from animal-rights activists have contributed to the bumpy, 20-year history of the planning and construction of the new \$19 million Animal Health Research Center at the University of Georgia.

But the state-of-the-art bio-containment center at the UGA College of Veterinary Medicine has another problem: building contractors are asking for \$6.5 million more to cover costs.

Canada-based Ellis-Don Construction Inc., the low bidder that won the project, says it wants the money to pay for **higher-than-expected rock removal costs** and delays at the job site, said Walt Fairchild of the Georgia State Financing and Investment Commission.

The commission, which oversees state construction projects, is in the process of hiring a claims consultant to study the request, Fairchild said.

The center, dedicated this month but not yet open for operation, is one of about a dozen Level 3 bio-containment centers in the world allowing the study of all but highly virulent animal diseases, from duck plague to the deadly E. coli 0157. Level 3 labs include isolation chambers for animal under study and are characterized by card-key access, low-pressure air, decontamination tanks, showers and filters.

Construction began in 1996 with funds from state and federal appropriations. The UGA College of Veterinary Medicine has allocated more than \$500,000 to run the building and to pay for personnel this fiscal year.

Much of the UGA campus lies on blue granite bedrock, the precise quantity of which is hard to estimate at job sites, so design changes are not uncommon, according to campus planners.

Fairchild said the amount of money Ellis-Don is asking for is beyond the money awarded them for rock excavation in the contract. The claims consultant will wade through claims from Ellis-Don that delays, change orders and redesigns cost them \$6.5 million in extra time and labor.

Ellis-Don also goes on to claim that the state suppressed knowledge of the extent of rocky conditions of the site, next the university's veterinary college, according to documents released to the Athens Daily News under an open-records request.

"The owner of the bio-containment research center refused to disclose the true rocky conditions of the jobsite, even though it had prior knowledge," according to a document related to the dispute. The contractor's financial claims have climbed since 1996.

The state claims Ellis-Don has fueled much of the problem. "The magnitude of the delay has been expanded by the actions,

Prescott, Kathy

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WD0405

or more to the point, the non-actions taken by Ellis-Don and its subcontractors in removing the rock," according to a 1997 letter from the state financing commission to Hugh Boochee of Ellis-Don. The UGA Office of University Architects declined to comment publicly on the ongoing dispute.

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Prescott, Kathy

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WD0754

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Monday, August 25, 2008 11:22 AM
To: NBAFProgramManager
Subject: COMMENT: DHS/NBAF supplemental meeting in Athens Feb. 19

Dear Mr. Johnson,

I am submitting the following email exchange as a COMMENT for the record to be addressed in the NBAF FEIS.

The public has been excluded from a full and fair exchange of information about NBAF. As noted below, the information gathering process was censored in Athens, GA and as a result, the community has been cheated out of a fair hearing and airing of their concerns.

THIS LACK OF OPEN COMMUNICATION AND THE ABILITY OF THE CITIZENS TO BE HEARD AND HAVE THEIR QUESTIONS ANSWERED IS ONE IMPORTANT REASON THAT COMMUNITY ACCEPTANCE FOR SITING NBAF IN ATHENS, GA HAS NOT BEEN AND NEVER WILL BE ACHIEVED.

Respectfully submitted,

Kathy Prescott
 Co-Founder, *FAQ, inc.*
 For Athens Quality-of-life

Begin forwarded message:

From: Kathy Prescott <preskat@bellsouth.net>
Date: February 25, 2008 5:37:45 PM EST
To: nbaforprogrammanager@dhs.gov
Cc: Grady <ngt@thrasher.com>, KP <preskat@bellsouth.net>
Subject: Fwd: DHS/NBAF supplemental meeting in Athens Feb. 19

Dear Program Manager,

I'm aware that in North Carolina the format of their town hall meeting was strictly followed as agreed to in advance by DHS.
 What happened in Georgia? Does Tim Bryant *trump* the Department of Homeland Security? (*see below*)

I'm aware that your intended purpose for coming to Athens was to reach out to the community. Since the communication I received detailing the format for this meeting was sent by Terry Hastings, I will assume that the moderator, Tim Bryant, was chosen by The University of Georgia. Unfortunately, the way in which Mr. Bryant presided over this meeting was completely counterproductive to your stated objective. Many people left this meeting disappointed in the lack of "transparency" afforded our community, and even more dissatisfied after hearing about the format

Comment No: 1 Issue Code: 4.2

Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 23 public meetings have been held in the vicinity of NBAF site alternatives and in Washington, D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered DHS has also provided fact sheets, reports, exhibits, and a Web page (<http://www.dhs.gov/nbaf>). Additionally, various means of communication (mail, tollfree telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance.

Comment No: 2 Issue Code: 27.0

DHS notes the information provided by the commentator.

1| 4.2

2| 27.0

Prescott, Kathy

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WD0754

of the later NC gathering.

2 cont.| 27.0

The meeting, as a result, diminished the credibility of DHS and, in conflict with your stated aims, went a long way toward cementing the reality that this community does not accept NBAF in Athens, GA.

Sincerely,
Kathy Prescott

.....

Begin forwarded message:

From: [REDACTED]
Subject: Re: DHS/NBAF supplemental meeting in Athens Feb. 19
Date: February 24, 2008 11:49:41 AM EST
To: preskat@bellsouth.net

Against my better judgement, I'm going to respond once more.

2 cont.| 27.0

Hopefully, you'll accept what I'm telling you and give UGa and DHS a break. The "no follow-up" business was my call, and mine alone. There was--sorry to disappoint--no conspiracy, no "editing of the format," at least not intentionally, certainly no attempt to silence anyone. To the contrary, my intention was to bring as many people to the microphone as possible, given the constraints of time. That's it, period. There is, or was, nothing beyond that.

As Terry has already mentioned, anyone who had further questions was able to pose them to the DHS people who graciously remained after the forum (despite being referred to as "fascists" and "traitors"). I'm at a loss as to why that was not satisfactory.

Perhaps we would have had more time, had those who approached the microphone come armed with actual questions, rather than statements. You might be interested to know that DHS talked me out of my original position, which was that questions should be limited to 30 seconds. DHS insisted on 2 minutes, over my objection. I ask questions for a living, and I know that any question that can't be asked in 30 seconds isn't a question, it's a statement attached to an agenda.

As I said earlier, any issues you might have with the format of the forum are issues with me, and not with UGa or DHS. Whether you chose to accept that or not is entirely up to you, but it's the truth, and also my final word on the subject.

Begin forwarded message:

Prescott, Kathy

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WD0754

From: Kathy Prescott <preskat@bellsouth.net>
Date: February 24, 2008 11:26:05 AM EST
To: Terry Hastings [REDACTED]
Cc: Tim Bryant [REDACTED]
Grady <hgt@thrasher.com>
Subject: Re: DHS/NBAF supplemental meeting in Athens Feb. 19

Terry,
As I recall, Tim Bryant said in advance of oral questions, "we are right on schedule". As I stated, the questioners knew that the meeting adjourned at 10 PM. The purpose of this meeting was to get ANSWERS. The purpose of the Scoping Meeting in September was for DHS to hear QUESTIONS.

Changing the format to eliminate the advertised and agreed to "follow up" enabled the panelists to defer to the draft EIS in most cases or totally ignore the basis of questions in others (mine included). At the North Carolina meeting two days later, the moderator "pressed" for answers. One example:

"We will not study anthrax, Ebola, the plague or smallpox," Johnson said.

However, when pressed by meeting moderator Frank Stasio of WUNC, Homeland Security officials acknowledged the list of diseases could change or expand depending on what new pathogens or threats could emerge.

"Yes or no?" Stasio asked repeatedly. After several roundabout answers, Johnson said, "Yes. If threats change, we would look at the list."

<http://www.indyweek.com/gyrobase/Content?oid=oid:185588>

and more from North Carolina:

"I would like to say Thank You to Frank Stasio of NPR's, State of Thing's for his thoughtful moderation of this meeting. Frank allowed and facilitated a format of questions that pressed the DHS for answers to all questions. Having been present at both meetings, I only wish the same format would have been afforded to the concerned residents of Athens.

In Athens if the DHS didn't completely answer a question they were not pressed further and no follow-up questions were allowed. Instead they continually reiterated the answer would not be available until the draft EIS (Environmental Impact Statement). That was unfortunate and should have not been allowed."

<http://butnerblogspot.wordpress.com/2008/02/22/dhs-town-hall-wrap-up/>

That was the public's last opportunity to ask questions unrelated to the Environmental Impact Statement. The Scoping Meeting following the Draft EIS will only allow questions that address information in that

2 cont. | 27.0

Prescott, Kathy

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WD0754

document.

I would like to know, did Tim Bryant agree to allow "one initial question and one follow-up question" as stated below, or not? Is his statement that "everything was based on discussions with DHS and UGA, and that point (follow-up) never came up" true, or not? I'd like to know what is going on here.

The area residents that planned for this meeting with deliberate and diligent questions left disappointed that they did not get answers. Either Tim Bryant decided as moderator to contradict the advertised format - or you sent me an email with bogus information to disrupt the questioning process.

Which is it? Maybe you can communicate this very explicitly.

Thank you,
Kathy

On Feb 22, 2008, at 2:07 PM, Terry Hastings wrote:

Kathy,

In the time available for oral questions, there was a trade-off between accommodating one question from as many individuals as possible, or allowing potentially half as many individuals to also have a follow-up question. I'm sure you would agree that DHS needed to hear from as many people as possible in the available time, and Tim did an excellent job ensuring that those who wanted to speak were heard during the oral questions period.

Please note that the panelists made themselves available after 10 p.m., staying as late as necessary to hear follow-up questions or additional comments if people wanted to engage with them. Since there were no restrictions on how this time might be used (questions, comments, discussion with others, etc.) and panelists remained in the auditorium for close to an hour, I'm confident that everyone who had follow-up questions had opportunity to have them addressed.

Regarding the draft EIS meeting: The NEPA prescribes the format, and I'm sure DHS will communicate it very explicitly.

Regards,
Terry Hastings

From: Kathy Prescott [<mailto:preskat@bellsouth.net>]
Sent: Friday, February 22, 2008 6:31 AM
To: Terry Hastings; nbafprogrammanager@dhs.gov
Cc: Tim Bryant; Grady
Subject: Re: DHS/NBAF supplemental meeting in Athens Feb. 19

Dear Ms. Hastings and NBAF Program Manager,

2 cont.| 27.0

Prescott, Kathy

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WD0754

I'd like to know what happened with the AGREED TO format sited below concerning Tuesday's town hall meeting in Athens so as to avoid the same confusion when DHS comes back to town in May/June.

Thank you,
Kathy Prescott

On Feb 22, 2008, at 5:27 AM, Tim Bryant wrote:

I don't know what else I can add to what I said on the show. I never saw anything about follow ups. In fact, I never saw anything, period. Everything was based on discussions with DHS and UGa, and that point never came up. The "no follow-up" thing was strictly arbitrary on my part. They asked me to moderate, they get my judgement on how to moderate.

----- Original Message -----

From: [Kathy Prescott](#)

To: [REDACTED]

Cc: [REDACTED]

Sent: Thursday, February 21, 2008 8:50 PM
Subject: Fwd: DHS/NBAF supplemental meeting in Athens Feb. 19

Tim,
After listening to your response to Matt this morning on your radio show, I was compelled to forward the communication below.

This morning you said, "I was never made aware of the business about a follow up question. I was in two conference calls with the DHS folks and we had a meeting prior to the thing on Tuesday night at 5:30 or 6:00. I don't remember anything about follow ups.

...I was never directed by anybody to allow follow up questions. Using my own judgement, I said no follow ups."

Many of the citizens of the Athens area that showed up on Tuesday night had spent hours preparing questions for this specially scheduled "town hall" meeting with this exact format in mind - because I sent it to everyone on my email list (that's 200+ people). I would like for you to explain to me why you felt the need to ignore the "agreed upon" details below and "use your own judgement" by allowing no follow up questions.

It very clearly states below that the meeting adjourns at 10 PM. People expected that. What

2 cont.| 27.0

Prescott, Kathy

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WD0754

they did not expect was an edited format.

I look forward to your reply.
Kathy Prescott

Begin forwarded message:

From: "Terry Hastinos"
[REDACTED]
Date: February 7, 2008 11:15:47
AM EST
To: "Kathy Prescott"
<preskat@bellsouth.net>,
NBAFProgramManager
<NbaFprogrammanager@dhs.gov>
Cc: "David Lee" [REDACTED]
Subject: RE: DHS/NBAF
supplemental meeting in Athens
Feb. 19

Kathy,
The date and time of the meeting
were confirmed on Thursday, Jan.
31, and posted on the NBAF web
site on Friday, Feb. 1.

**Following are details on the
meeting, as agreed upon with
DHS on Tuesday, and with the
meeting moderators
(described below) yesterday.** The
time has changed slightly to allow
people to come early and submit
written questions, although the
presentation time remains 7 p.m.
Details on format will be added to
the NBAF web site today.

The meeting will be held Feb. 19,
6:30 to 10 p.m., at Mahler
Auditorium, Georgia Center for
Continuing Education. It is intended
to be an informal meeting that will
allow the community to hear directly
from experts from DHS, USDA and
Plum Island Animal Disease Center.
Its purpose is to address
misperceptions about NBAF and set
the record straight. The top
concerns of the Athens community
will be addressed. These include:
What the mission of NBAF will be,
how it will be designed, what
measures will be taken to ensure
safe operations, how it will impact
the environment, what types of input
the community will have, and more.

2 cont. | 27.0

Prescott, Kathy

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WD0754

DHS is holding similar meetings at all of the consortia to ensure that these communities also have accurate information about NBAF. The meetings are not part of the public record.

A format was developed to ensure that citizens who are not comfortable asking questions in front of a large audience, as well as those who are, have opportunities to ask questions. To ensure that there is an impartial review and selection of written questions, members of the Athens media who are familiar with the NBAF proposal and community concerns, are participating.

Jim Thompson, editorial editor, Athens Banner-Herald, and Ben Emanuel, city editor, Flagpole, will be reviewing, sorting, and selecting the written questions to be answered. Questions may be submitted in advance to: [REDACTED]

Tim Bryant, news editor at WGAU, will be moderating the meeting, reading the selected written questions, and calling on people for oral questions.

The schedule is as follows. Times may vary slightly, but will be adhered to as much as possible.

6:30 p.m. - Meet and greet session. At this time, attendees may continue to submit advance questions in writing to the moderators. Cards will be provided.

7 p.m. - Introduction and presentations by panelists from DHS, USDA, and PIADC.

8 p.m. - Short break so people will have another opportunity to formulate, write and submit written questions, based on what they heard, and formulate any oral questions for later in the meeting.

8:10 - Written questions will be answered by panelists. Jim Thompson and Ben Emanuel will be moderating written questions submitted in advance of the meeting and at the meeting to ensure that

2 cont. | 27.0

Prescott, Kathy

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WD0754

the range of community concerns is addressed, and to eliminate duplicate or already answered questions. Tim Bryant will be announcing the questions, re-stating as needed for clarity.
9:15 - The audience will be invited to ask oral questions of the presenters. Tim Bryant will moderate. Each person who approaches the mike **will be allowed to ask one initial question, and one follow-up question**. Tim will clarify what is a "question" and any other rules.
10:00 - Meeting adjourns.

You will begin hearing radio PSAs and ads this coming weekend. Print ads will also run in the ABH and Flaggpole the week of Feb. 11. Jim Thompson and Ben Emanuel will provide information about the meeting in their columns, too.

I hope this provides you with adequate information about the Feb. 19 meeting. Please let me know if you have additional questions.

Terry

-----Original Message-----

From: Kathy Prescott
[\[mailto:preskat@bellsouth.net\]](mailto:preskat@bellsouth.net)
Sent: Thursday, February 07, 2008 8:51 AM
To: NBAFProgramManager; Terry Hastings
Subject: DHS/NBAF supplemental meeting in Athens Feb. 19

Dear NBAF Program Manager and Ms. Hastings,

We understand that at the DHS supplemental meeting to be held in North Carolina on Feb. 21, citizens are required to submit their questions to DHS ahead of time for review before they can be asked at the meeting. We at FAQ "For Athens Quality-of-life" for several days have been seeking information from DHS (UGA's website has been slow to provide even the date of our meeting) as to the format for the Athens meeting to be held Feb. 19

2 cont.] 27.0

Prescott, Kathy

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WD0754

2 cont., 27.0

and how citizens' questions will be received, prioritized and answered. The Athens meeting is only 12 days from now, and since it is being held as a public information undertaking, it appropriate and necessary that we be timely advised as what conditions may be place on our inquiries.

Please advise asap.

Thank you,

Kathy Prescott and Grady Thrasher
for FAQ www.athensfaq.org

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.516 / Virus Database: 269.20.9/1292 -
Release Date: 2/21/2008 4:09 PM

Prescott, Kathy

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WD0613

From: Kathy Prescott [preskat@bellsouth.net]
Sent: Saturday, August 23, 2008 3:39 PM
To: NBAFProgramManager
Cc: Director@athensfaq.org
Subject: COMMENTS / STATE BOTANICAL GARDEN OF GEORGIA

Dear Mr. Johnson,

PLEASE CONSIDER ALL OF THIS INFORMATION AS AN NBAF DEIS COMMENT. THESE ISSUES SHOULD BE ADDRESSED IN THE NBAF FEIS.
 1113.2 I am attaching articles that detail many important aspects of The State Botanical Garden of Georgia, which, as stated in the DEIS, is "approximately 0.5 miles northwest of and adjacent to the proposed NBAF site on South Milledge Avenue". I am also describing inconsistencies in the DEIS and submitting questions that are relevant to the Botanical Garden.

Botanical Garden breathes life into Athens
http://www.onlineathens.com/stories/030799/sli_0307990004.shtml

Ongoing Research at the Garden
<http://www.uga.edu/~botgarden/research.html>

State Botanical Garden of Georgia - Plants and History Meet in a 300-Acre Paradise
http://americangardens.suite101.com/article.cfm/state_botanical_garden_of_georgia

UGA properties designated Georgia's 47th "Important Bird Area"
<http://outreach.uga.edu/news/2006/12/14/uga-properties-designated-georgias-47th-important-bird-area/>

The Citizen Scientist Newsletter - Georgia's Important Bird Area (IBA)
<http://georgiawildlife.dnr.state.ga.us/documentdetail.aspx?docid=547&pageid=4&category=other>

The State Botanical Garden of Georgia ... to Join National Center for Plant Conservation
<http://www.centerforplantconservation.org/Assets/NewsReleaseNewGeorgialnstitutions.pdf>

EXECUTIVE SUMMARY / NOISE (page ES-7)

"Noise effects would be similar for all sites, although residential and recreational receptors near the South Milledge Avenue Site ... may be more likely to be affected. EXECUTIVE SUMMARY TABLE SAYS **MINOR**

TABLE 2.5.1-2 COMPARISON OF ENVIRONMENTAL EFFECTS (page 2-33)

Noise / South Milledge Avenue Site
 "Temporary effects to noise levels may be experienced by the Botanical Garden and residents due to construction activities including construction-related traffic. Operation of the NBAF would result in minor increases in noise levels from employee traffic and heating and cooling facilities. However, operation of the emergency generators would result in **sporadic noise increases during testing**."

Comment No: 1 Issue Code: 13.2

DHS acknowledges the commentor's submittal of items relevant to the ecological value of the State Botanical Garden and the Important Bird Area (IBA). DHS also notes the commentor's concern regarding potential effects on the State Botanical Garden and the IBA. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden or IBA. 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 dispersal between the Botanical Garden and Whitehall Forest. 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 3.5.3 of the NBAF EIS describes the potential construction and operational consequences of NBAF on the acoustic environment at the South Milledge Avenue Site. Once a site is selected, a detailed geotechnical report will be prepared to help finalize the final NBAF design with the results used to develop detailed construction plans and techniques. If blasting is required, efforts will be taken to minimize the blast number(s), intensity, and duration. A blasting plan would be developed implementing construction measures such as minimizing explosive weights, stemming depths and material, and delay configurations all to mitigate potential noise levels. Section 3.5.5.3 describes noise-attenuating design features that would minimize operational 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. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. Mitigation measures, such as the use of shielded lighting, will be considered in the final design of the NBAF. The mitigation measures described in Section 3.15 would minimize the potential for impacts in adjacent habitats. Given the relatively low profile of the building and the use of mitigation measures, significant lighting impacts on migratory birds would not be likely to occur.

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(page 2-38)

Socioeconomics / South Milledge Avenue Site

"Should a release of certain vector-borne pathogens occur, impacts such as **aerial spraying of insecticide(s)** could directly affect minority and low-income communities and other populations **immediately adjacent to the site.**"

NOISE*Construction Consequences*

(page 3-88)

"The University facilities and the few non-University neighbors, including the State Botanical Garden, may experience temporary construction noise effects. Also, construction noise would temporarily disperse wildlife from adjacent undeveloped areas."

Operational Consequences

"A potentially **significant noise emission source** would be the emergency generators; however the generators are a back-up response system and would not be a routine noise emission source."

BIOLOGICAL RESOURCES*Construction Consequences*

(page 3-173)

"Construction would have no direct effect on the State Botanical Garden/Whitehall Forest IBA ... Since the forested portion of the proposed NBAF site will be minimally affected, no significant impacts on the State Botanical Garden/Whitehall Forest IBA are likely to occur".

Operation Consequences

(page 3-174, 175)

Normal operation would have no direct effect on native wildlife. Routine operations would result in minimal noise emissions.

POTENTIAL OPERATIONAL CONSEQUENCES FOR WILDLIFE*Rift Valley Fever*

(page 3-218)

"However, the RVF response plan would also include a mosquito control action plan. The mosquito control action plan would most likely include the aerial application of insecticides within the infection zone. Due to the ability of RVF to persist in infected mosquito eggs, **repeated aerial spraying may be required over an extended time period.**"

QUESTIONS:

1Cont.113.2

1. SPORADIC NOISES WOULD BE MORE DISRUPTIVE TO WILDLIFE. TESTING IMPLIES OVER TIME / NOT SHORT TERM. HOW CAN THE DEIS SAY THAT THE DISPERSAL OF WILDLIFE WOULD BE TEMPORARY? HOW CAN THE DEIS SAY THAT EVEN NORMAL OPERATIONS WOULD HAVE NO DIRECT EFFECT ON NATIVE WILDLIFE?

2. EXTENSIVE BLASTING OF BEDROCK WILL INCREASE THE MAGNITUDE AND DURATION OF CONSTRUCTION CONSEQUENCES ON THE WILDLIFE AND ON THE BOTANICAL GARDEN PATRONS AND EMPLOYEES.

1Cont.113.2

3. AERIAL SPRAYING OF WHAT KINDS OF INSECTICIDE(S) ARE BEING CONSIDERED? HOW WILL REPEATED AERIAL SPRAYING OF INSECTICIDES OVER THE BOTANICAL GARDEN (WELL WITHIN THE INFECTION ZONE) EFFECT THE BENEFICIAL INSECTS THAT ARE REQUIRED FOR THE SUSTAINABILITY OF THE RARE AND ENDANGERED PLANTS AT THE BOTANICAL GARDEN - NOT TO MENTION THE EFFECT THAT THESE CHEMICALS WOULD HAVE ON THE BIRD POPULATIONS - AND THE EMPLOYEES AND PATRONS OF THE GARDEN?

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5/13.2 | To consider the South Milledge Avenue Site as one of the five best locations for NBAF on the mainland is absurd. The fact that The State Botanical Garden of Georgia is located NEXT DOOR should take the South Milledge Avenue Site out of consideration. THIS IS A RECREATIONAL AREA - VISITED BY THOUSANDS OF PEOPLE A YEAR. The FEIS must address these issues.

Respectfully submitted,

Kathy Prescott
Co-Founder FAQ, inc.
For Athens Quality-of-life

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*Story last updated at 11:37 a.m. on Sunday, March 7, 1999***Botanical Garden breathes life into Athens****By Wayne C. Wehunt**
Correspondent

For more than 30 years, Athens-Clarke County has been home to a natural treasure yet to be discovered by many area residents.

The State Botanical Garden of Georgia, off South Milledge Avenue a short distance outside the Athens Perimeter, is the realization of a dream that took root more than three decades ago.

The idea for a botanical garden in Athens was first proposed to the University of Georgia by its Campus Planning and Improvement Committee on Dec. 14, 1967, according to Francis E. Johnstone Jr., the first director of the garden.

After receiving approval from the Board of Regents, UGA President Fred Davison appointed a 10-member Faculty Garden Committee to select a suitable site, prepare a program of major requirements and develop a budget and plan for financing the garden.

Although the proverbial ball had begun to roll, few could have predicted the tremendous snowball effect that would follow. Within just a few years time, the visionary dreams of a few University of Georgia officials would blossom into reality for an entire community.

Less than two months after its first meeting on March 14, 1968, the committee had prepared its final proposal to establish The University of Georgia Botanical Garden. A few months later, Davison authorized the project, stating, "this program has tremendous potential and will play an important role in the university's push for excellence in the years ahead."

Realizing the need for funding, numerous groups and individuals provided donations and grants for the effort. The Georgia Horticultural Society, The Garden Club of Georgia and a host of other organizations and individuals donated thousands to the cause.

University students also were actively involved in the project. In July 1968, three landscape architecture students presented a topographical model and written analysis of the proposed 293-acre site on South Milledge.

This information was used to select areas for development, for laying out roads and trails and for studying the various plant groups on the site.

The approval of a \$14,000 annual budget for the garden on July 1, 1970, provided a milestone of sorts - recognition of the garden as a budgetary unit of the university. Many of the needs left uncovered by the budget were subsidized by non-university sources, according to records.

In March 1970, work began on the site. Three miles of trails were laid out and cleared. Vince Dooley, the university's head football coach, reportedly "volunteered" two of his overweight football players to help clear about a mile of tangled brush and vines along one of those trails.

On Nov. 13, 1971, Georgia Gov. Jimmy Carter and his wife, Rosalynn, joined with committee members and various contributors to walk the garden's brand-new trails prior to a Georgia-Georgia Tech game in Athens. This walk represented a turning point in the progress of the project.

Carter agreed to allocate \$13,000 in state funds for a master plan soon after his visit. The favorable publicity received from the visit also advanced fund-raising around the state, according to records.

Less than two years later, the Callaway Foundation granted \$653,686 for a headquarters building. On July 18, 1974, Rosalynn Carter joined with garden supporters and other interested people to break ground on the facility, which was completed in 1975. Aside from personnel offices, the Callaway Building houses a library, auditorium and reception area, along with laboratories and conference facilities.

Throughout the following years, new trails were laid out, miles of irrigation lines were installed and many new plants were planted. Organized trail walks and outdoor laboratory classes also were conducted for the first time.

A \$25,000 restroom facility was added in 1978, along with a covered shelter and public address system for the Callaway Building. By 1978, the garden's fiscal budget was \$66,320 -- a 400 percent increase over the 1970 fiscal-year budget.

In September 1982, ground was broken for the \$2.6 million Visitor Center and Conservatory building, which was opened to the public in 1985. The Callaway Foundation also funded an entrance plaza and

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fountain for the building.

The University of Georgia Botanical Garden was designated The State Botanical Garden of Georgia by an act of the Georgia General Assembly in February 1984. This change allowed the garden to receive additional state funding and provided it with additional stature within the state.

In 1990, the garden acquired 19.3 additional acres lying just across the Middle Oconee River in Oconee County. This area added to the diversity of habitats occurring among the existing flood plains, slopes and upland plateaus.

The 313-acre botanical garden is a living laboratory today, serving teaching, research and public service roles for the university and the citizens of Georgia, according to Jeff Lewis, director of the garden.

It contains a wide variety of natural features and includes plant communities and habitats common to the Georgia piedmont. A number of specialty gardens and collections exist and others will be added in the coming years, Lewis said.

The \$2.2 million International Garden, located on 3.3 acres behind the Visitor Center, portrays the interrelationship between people and plants.

Eleven botanical and horticultural collections depict the geographic origins of plants, the plant hunters who sought them, and the forces that drove plant hunters. The International Garden is the only garden in the Southeast that focuses on the role of plants in the development of human civilization, according to Lewis.

The Georgia Heritage Garden is scheduled for completion within a year, Lewis said. This garden, which will be located near the International Garden, will trace the interrelationships of Georgia's historical, cultural and economic development with agricultural plants, emphasizing the influence of cotton, tobacco, peaches and pecans on the state.

An expanded flower garden is also in the works, according to the director. It will allow the botanical garden to unify its smaller rose, annual and perennial flower displays into a larger exhibit.

Those who enjoy a walk with nature can explore five miles of color-coded trails which extend into the far reaches of the garden. The longest trail is the White Trail which parallels the Middle Oconee River for several hundred yards.

The Day Chapel, completed in 1994, is a major architectural feature of the garden. The chapel includes a set of carved mahogany and glass doors which separate the vestibule from the sanctuary. Abundant doors and windows provide beautiful views into the surrounding hardwood forest.

Ongoing Research at the Garden

The Garden is a living laboratory for university teaching and research. Students and faculty utilize the collections and natural plant communities for studies in a variety of disciplines including plant reproductive biology, vegetation analysis, ecosystem studies, plant pathology, horticultural trials, museum studies, environmental design, and anthropology. The Garden's research staff maintains active research programs that focus on rare and endangered species of the Southeast and conservation of native species of medicinal plants.

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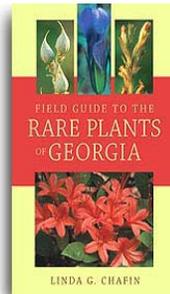


Torreya taxifolia Florida Torrey

Many of the garden's research activities are performed in collaboration with the Georgia Plant Conservation Alliance (GPCA). This is a nationally recognized network of botanical gardens, state and federal agencies, universities, and conservation organizations working together on a variety of plant conservation and environmental education programs in the state. Garden staff participate in numerous GPCA projects including restoration of habitat for the federally endangered Smooth Purple Coneflower (*Echinacea laevigata*), development of the SERPIN website (Southeast Rare Plant Information Network), protection of the endangered Florida Torrey, pitcherplant bog restoration, germination studies of rare species endemic to granite rock outcrops, and propagation of Carolina Hemlocks. For more than ten years GPCA has enabled our garden to combine research efforts with other conservation professionals around the state, and coordination of the organization remains one of our highest priorities.

The Garden also manages the Botanical Guardians program. This is a state-wide network of volunteers that locates "lost" populations of rare plants and monitors known populations to ensure they are properly managed. The Garden's research staff also grows plants in our outdoor propagation area for reintroduction and conservation education projects in collaboration with the Georgia Natural Heritage Program and the U.S. Fish and Wildlife Service.

The Botanical Garden research program has published the book *Field Guide to the Rare Plants of Georgia*. In addition to descriptive text summarizing species characteristics and management recommendations, the field guide features beautiful photographs and original line drawings of 200 rare, threatened, and endangered Georgia plant species, utilizing the most comprehensive and current data available from the State Heritage Program, GPCA, and other sources.



The research and conservation staff of the Garden has worked closely with the education staff to develop the *Endangered Plants Stewardship Network* (EPSN). This is a teacher training program that emphasizes rare plants, threatened habitats, and conservation biology as a training ground for science education.

University of Georgia graduate students supervised by Garden staff and supported by the Garden's graduate assistantship have completed Masters and Ph.D. programs in the Department of Horticulture and the Institute of Ecology. Research projects have focused on the population genetics, reproductive biology, germination requirements, environmental physiology, and tissue culture of rare plants. Several students have pursued studies of medicinal and aromatic plant species including Bloodroot (*Sanguinaria canadensis*) and Lemon Verbena (*Aloysia citriodora*).

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Jardin Botanico Miguel Culaciati in Huerta Grande, Córdoba, Argentina

The Garden is a member of Botanic Garden Conservation International and works closely with two botanical gardens in Latin America. We have a sister garden in the province of Córdoba, Argentina, the [Jardín Botánico Miguel Culaciati](#). This partnership has involved several staff exchanges and collaboration on medicinal plant conservation and environmental education projects. The Garden's research staff are playing a leadership role in developing a new botanical garden on the campus of the [University of Georgia's San Luis Research Station](#) in the Monteverde cloud forest region of Costa Rica. We are also collaborating with a local non-profit organization in Monteverde (ProNativas) to select, propagate, and evaluate native Costa Rican species with ornamental potential.

Students and faculty are encouraged to contact the Director of Research at the Garden for further information concerning academic use of the Garden facilities. Inquiries concerning conservation programs should be directed to the Conservation Coordinator.

**State Botanical Garden of Georgia
Plants and History Meet in a 300-Acre Paradise**
© Colleen Vanderlinden
Jul 4, 2007

The State Botanical Garden of Georgia, located in Athens on the campus of the University of Georgia, showcases native plants, All-American winners, and plants in history. The State Botanical Garden of Georgia is a true gem among public gardens. Its diverse plant collection, focus on education and conservation, and attention to the importance of plants throughout history make it a unique destination for plant lovers. The 313-acre preserve is located on the grounds of the University of Georgia, and serves as a "living laboratory" for faculty and students to study the importance of plants across a multitude of disciplines. It is, perhaps, this focus on learning about the greater role of plants in our world that sets the State Botanical Garden of Georgia apart from other public gardens.

Studying the History of Plants

Two unique gardens at the State Botanical Garden are the International Garden and the Heritage Garden. Both focus on the role of plants in history and our interaction with them. The International Garden demonstrates the interrelationship between people and plants in three important historical periods: the Middle Ages, the Age of Exploration, and the Age of Conservation. The Middle Ages are represented by an herb and a physic garden reminiscent of 17th century gardens. The Age of Exploration showcases plants from the Mediterranean, Middle East, Spanish America, American South, and China as plant hunters fervently searched the globe for new and valuable plants. The Age of Conservation focuses on

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threatened and endangered plants. As a whole, the International Garden pays homage to three plant hunters who had large impacts on the American South: John and William Bartram and Ernest Henry Wilson.

The second unique garden is the Heritage Garden, which "contains plants of historic and socioeconomic interest to Georgia." It showcases heirloom annuals, perennials, vegetables and herbs, antique roses, important agricultural crops such as cotton and peanuts, and several plants that are native to Georgia. The garden also celebrates important milestones and people in Georgia's agrarian history. History buffs and plant lovers can get happily lost in these two gardens.

All-American Display Gardens

Two wonderful features of the State Botanical Garden of Georgia are the All-American Rose Garden and the perennial garden featuring All-American Selections. These areas will be of special interest to gardeners who are looking for reliable plants for their own landscapes.

More About the Collection

There are several other wonderful and unique gardens within the preserve. These include:

Native Flora Garden
Rhododendron and Native Azalea Collection
Shade Garden
Dahlia Garden

In addition, the State Botanical Garden of Georgia boasts five miles of color-coded nature trails, visitor center, gift shop, cafe, and conservatory.

Sources:

State Botanical Garden of Georgia Website
Gardens Across America, Volume 1: East of the Mississippi by Thomas S. Spencer and John J. Russell
Gardenmob post: State Botanical Garden of Georgia by Barrie Collins

UGA properties designated Georgia's 47th "Important Bird Area"

Athens, Ga. (October 27, 2006) – The Georgia Important Bird Area (IBA) Technical Committee recently unanimously designated the State Botanical Garden of Georgia and Whitehall Forest, both owned by the University of Georgia, as an IBA.

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The IBA program is a global effort, managed by the Audubon Society in the United States, to identify areas that are most important for maintaining bird populations and focus conservation efforts at protecting these sites. IBA designation recognizes properties that are critical to birds during some part of their life cycle (breeding, wintering, feeding and migrating) with the hope of minimizing the effects that habitat loss and degradation have on bird populations, according to the Audubon Society.

Karla and Bill O'Grady, members of the Oconee Rivers Audubon Society (ORAS), the local chapter of the national organization, began collecting data on birds two years ago.

The couple heard others complain that the Botanical Garden was not IBA designated, and after reviewing several Georgia birding resources they discovered there was little mention of the Athens-Clarke County area, "which I think is a wonderful birding area," said Karla O'Grady. So, they became determined to achieve IBA designation for the Botanical Garden.

"We had no understanding of the selection process," O'Grady said. "One bird alone does not meet the qualifications."

The O'Gradys soon discovered the acreage at the garden resulted in too limited a number of bird species to meet the IBA specifications, so nearby Whitehall Forest was added to the total area before the application was submitted. "We were so pleased with the incredible variety of birds in Whitehall Forest," O'Grady said.

The couple gives much credit to fellow ORAS members Ed Maioriello, Board of Regents network support; and Alison Huff, director of publications at UGA; who they say "have amazing ears for bird calls and have been a tremendous help" identifying the multiple species present at these locations. Combined, the group spent more than seven hundred hours watching and listening for birds and recording their findings on the Cornell Ornithological Laboratory's e-bird website. Once their bird counts reached pre-determined IBA standards they submitted their information to the Georgia IBA Technical Committee for official designation.

"The strengths of this nomination were that the area is excellent for birds, particularly those that use riparian habitat," explained Jim Wilson, Georgia's IBA coordinator. "Many migrant bird species follow rivers during their migrations and this area is perfect for them to stop and use for feeding, nesting and breeding."

The 46 previously designated IBA's across Georgia include Callaway Gardens, Kennesaw Mountain National Battlefield Park, Okefenokee Swamp and Chattahoochee National Forest. For more information about designated IBA areas across Georgia, or to find criteria on how to designate an area that provides quality bird habitat, visit the Atlanta Audubon Society website at:

<http://www.atlantaaudubon.org/aaswww/iba/iba.htm>.

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This article was posted on Thursday, December 14th, 2006 at 6:18 pm and is filed under [News](#).

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The Citizen Scientist Newsletter - Spring 2007 Issue - Georgia's Important Bird Area (IBA) Program Hires New Coordinator

The National Audubon Society and the Atlanta Audubon Society is pleased to welcome Mary Elfner as the new Important Bird Areas (IBA) Program Coordinator in Georgia. In her new role, Elfner will work with the national office, Audubon chapters in Georgia and volunteers to effectively address conservation issues at Important Bird Areas in Georgia. Elfner will also continue to raise awareness about Georgia's IBAs, spearhead monitoring and sites assessments of IBAs, and continue the identification of sites as data become available. She began her duties on 10 January 2007, following in the footsteps of Jim Wilson, who coordinated this program in Georgia since 1999. Mary Elfner brings a wide range of experience to this position, having worked on a number of conservation issues at federal, state, and non-profit positions.

The Important Bird Areas Program is Audubon's primary conservation initiative and is part of a global partnership with Birdlife International to identify key areas throughout the world for bird populations. IBAs are sites that provide essential habitat for one or more species of bird and include locales for breeding, wintering, and/or migrating birds. IBAs may be a few acres, or thousands of acres, but usually they are discrete sites that stand out from the surrounding landscape. IBAs may include public or private lands, or both, and they may be protected or unprotected.

Georgia's Important Bird Areas Program has identified 48 IBAs in the state. The program's current emphasis is on monitoring the bird populations at these sites, with the help of birders from local Audubon Chapters, and improving the survey methods used in assessing bird numbers at these sites. The IBA program in Georgia has partnered with many conservation groups throughout the state including the Georgia Department of Natural Resources, federal agencies such as U.S. Fish and Wildlife Service, the U.S. Forest Service, the U.S. Geological Survey, the U.S. Department of Agriculture, and non-profit organizations such as The Nature Conservancy, Forest Watch, Georgia Ornithological Society, and many others.

Audubon members and interested birders who would like to get more involved in Georgia's IBA efforts can contact Mary Elfner, Georgia IBA coordinator, at maryeoff@comcast.net. For a full review of Georgia's Important Bird Areas, please visit www.audubon.org/bird/iba and click on the state of Georgia.

IBA PROGRAM STRATEGY

Georgia's IBA Program has as its Mission Statement to identify, monitor, enhance, and conserve the essential bird habitats in Georgia. As part of this mission, three of the top goals and strategies are:

1. Continue to find or train expert birders who can survey and monitor IBA sites.

One of the strategies to be used for this goal is to establish grassroots IBA Stewardship Teams or individuals from around the state to monitor bird populations and to assess the habitats and their conditions in the IBAs. These persons might be from Audubon Chapters, the Georgia Ornithological Society, or recruitments from announcements such as those for GABO or from the advanced training sessions that Atlanta Audubon has been leading. In addition, the use of the IBA Data Website by birders in Georgia will be more energetically pursued.

2. Carry out conservation efforts for the IBAs.

Continue to categorize the threats, urgencies, and conservation issues for each IBA, prioritize them, and determine the best way to go about conserving the bird populations at each IBA site. It would also be of great importance to

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pick a high profile conservation issue for one IBA and implement action on it such that a grant to the National Fish and Wildlife Foundation (NFWF).

3. Promote publicity and educational outreach agendas designed to make the public aware of the need to save significant bird habitats.

One method to pursue this goal is to create an IBA Outreach Committee whose primary function will be to help plan, organize, and implement statewide media campaigns related to the IBA Program and similar projects. Recruit members to this committee who have backgrounds in education, the media, and/or advertising. Additionally, the IBA Program should continue to carry out public dedication ceremonies to make citizens, NGO organizations, government agencies, and businesses aware of the IBAs near to them. As part of the outreach efforts, the IBA Program will work with other NPO/NGO organizations to promote this recognition of Georgia's IBAs and expand the number of articles that are published each year in newsletters, journals, newspapers, and magazines.

Mary Eifner, Georgia IBA Program Coordinator
marvgeoff@comcast.net

Georgia's Designated Important Bird Areas:

Altamaha Waterfowl Management Area
Altamaha River Delta
Andrews Island
Big Duke's Pond
Big Hammock WMA
Blackwater Plantation
Bond Swamp NWR
Bullard Creek WMA
Chattahoochee National Forest
Carter's Lake
Charlie Elliott Wildlife Center
Chicopee Woods Nature Preserve
Elachee Nature Center
Crockford-Pigeon Mt. WMA
Cumberland Island
Cypress Lake Plantation
Dawson Forest WMA
DiLane Plantation WMA
Eufaula NWR - Bradley Unit
Fermbank Forest
Fort Benning
Fort Stewart
Garden Lakes
Grand Bay/Banks Lake Ecosystem
Harris Neck NWR
Jekyll Island
Joe Kurz WMA
Kennesaw Mt. Natl. Battlefield Park
King's Bay Naval Station
Lake Seminole WMA

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Little Tybee Island
Oconee National Forest
Okfeokee Swamp
Osabaw Island
Paradise Public Fishing Area
Phinizy Swamp
Piedmont NWR
Pine Mt. Ridge
Plant Wansley Lake
Red Hills Area
Rum Creek WMA
St. Catherines Island
Savannah NWR
Southlands Forest
State Botanical Gardens/Whitehall Forest
Swamp of Toa
Wassaw Island NWR
Yuchi WMA

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For Immediate Release
Contact: Jo Meyerkord, 314-577-9541
Geri Laufer, 404-591-1550
Lisa Kennedy, 706-542-1244

**THE STATE BOTANICAL GARDEN OF GEORGIA AND ATLANTA
BOTANICAL GARDEN ACTIVELY WORKING ON 39 NATIVE SPECIES
INVITED TO JOIN NATIONAL CENTER FOR PLANT CONSERVATION
(CPC)**

ST. LOUIS, Mo. (April 27, 2007) – The State Botanical Garden of Georgia and the Atlanta Botanical Garden have been invited to become full *Participating Institutions* in the Center for Plant Conservation (CPC), a national organization dedicated solely to preventing extinction of America’s imperiled, native flora. Made up of a network of 36 of America’s leading botanical institutions located throughout the country, CPC is headquartered in St. Louis and maintains the National Collection of Endangered Plants to further their mission of conserving and restoring the rare native plants of the United States.

“We are delighted to have the opportunity to work with both of these gardens as a part of the CPC network,” said Kathryn Kennedy, President and Executive Director of CPC.

“These are both challenging and exciting times in plant conservation. Both of these institutions represent valuable partners in the CPC’s efforts to increase capacity and coordination for plant conservation needs nationwide.”

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Both The State Botanical Garden of Georgia and the Atlanta Botanical Garden have deep commitments and long histories of support for conservation and a solid record of accomplishment for the plant biodiversity of the states and the region. The Gardens worked in a collaborative effort establishing the Georgia Plant Conservation Alliance (GPCA), a network of public gardens, government agencies, and environmental organizations committed to preserving Georgia's endangered flora formed in 1995. GPCA initiates and coordinates efforts to protect natural habitats and endangered species through biodiversity management and public education. From rigorous scientific research to hands-on stewardship projects with elementary schools, the combined resources, expertise and outreach strategies of GPCA members provide powerful tools for plant conservation in Georgia.

"Plant conservation is the cornerstone of our research program and forms an important component of our teaching and public service programs as well. We're delighted to join CPC in what we believe will be a mutually beneficial relationship to protect and conserve our native flora," said Dr. Jeff Lewis, Director of The State Botanical Garden of Georgia.

The State Botanical Garden of Georgia is located on more than 300 acres near the University of Georgia in Athens, encompassing both natural lands and cultivated gardens. The State Botanical Garden of Georgia is currently actively working on the conservation and restoration of 14 native plant species. It is a public, non-profit educational organization under the auspices of The University of Georgia. Its mission is

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to foster appreciation, understanding, and stewardship of plants and nature through research, collections and displays, horticultural gardens, educational programs, and special events.

Atlanta Botanical Garden Executive Director Mary Pat Matheson explained, "We are pleased to be formally included in the CPC and recognized for our work in the Southeast as a leader in plant conservation. The importance of this national collaboration for native plant conservation cannot be overstated." The Atlanta Botanical Garden is currently actively working on the conservation and restoration of 25 federally endangered native species in five states across the southeast. The Atlanta Botanical Garden is an urban, non-profit garden located just three miles from the city center in midtown Atlanta. The Garden encompasses 15 acres of second- growth woods and 15 acres of well-respected cultivated gardens, and includes an international conservation program inside the Fuqua Conservatory and Fuqua Orchid Center. The mission of the Atlanta Botanical Garden is to develop and maintain plant collections for display, education, research, conservation and enjoyment.

The Center for Plant Conservation is coordinated by a national office and guided by a volunteer board of trustees and the experts of the CPC Science Advisory Council. By developing standards and protocols and conducting conservation programs in horticulture, research, restoration, and raising awareness, CPC's network is striving to

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save America's rarest plants from being lost forever. For additional information on the Center for Plant Conservation visit the CPC website at www.centerforplantconservation.com

For more information about the native plant Conservation program at the Atlanta Botanical Garden, visit www.atlantabotanicalgarden.org/site/conservation/native_plants, or contact Geri Laufer, Public Relations Manager at 404-591-1550. The general garden phone number is 404-876-5859.

For additional information about The State Botanical Garden of Georgia visit www.uga.edu/botgarden, or contact Lisa Kennedy, Public Relations/Publications Coordinator at 706-542-6152. The general garden phone number is 706-542-1244.

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From: Kathy Prescott [preskat@bellsouth.net]
Sent: Sunday, August 24, 2008 3:36 PM
To: NBAFProgramManager
Cc: Director@athensfaq.org
Subject: COMMENT: NBAF MISSION/HUMAN DISEASES

Dear Mr. Johnson,

Please place these comments/questions on the record to be addressed in the NBAF FEIS.

1| 1.0 | **WHAT IS THE MISSION OF NBAF?**

FEDERAL REGISTER: JANUARY 19, 2006 (VOLUME 71, NUMBER 12):

"The proposed NBAF is an integrated **HUMAN**, foreign animal, and zoonotic disease research, development and testing facility that will support the complementary missions of the Department of Homeland Security (DHS), the **DEPARTMENT OF HUMAN HEALTH AND SERVICES [sic] (HHS)** and the United States Department of Agriculture (USDA)."

"The proposed NBAF is envisioned to provide the nation with the first integrated agricultural, zoonotic disease, and **PUBLIC HEALTH** research, development, testing, and evaluation facility with the capability to address **THREATS FROM HUMAN PATHOGENS**, high-consequence zoonotic disease agents, and foreign animal diseases. The NBAF would enhance the national bio-defense complex by modernizing and integrating agriculture biocontainment laboratories for foreign animal disease, **HUMAN PATHOGENS**, and zoonotic diseases and could require Biosafety Level (BSL) 3 Agricultural and BSL 4 laboratory spaces."

"The proposed NBAF would replace the existing PIADC facility and enhance capabilities to meet the mandated national bio and agro-defense mission requirements of DHS, **HHS**, and USDA."

FROM THE DHS WEBSITE: FIRST DOWN-SELECT FOR POTENTIAL NBAF SITES (8/9/06):

"As a joint activity with the U.S. Department of Agriculture (USDA) and the **DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS)**, DHS is developing the requirements for a next-generation biological and agricultural defense facility to enhance and protect the country's agriculture and **PUBLIC HEALTH**."

"DHS plans to equip the NBAF with numerous laboratories that will conduct research in high-consequence biological threats involving foreign animal, zoonotic (transmitted from animals to humans), and **HUMAN DISEASES**."

FROM THE DHS WEBSITE: SECOND DOWN-SELECT FOR POTENTIAL NBAF SITES (7/11/07):

"The NBAF, when built, will enhance our nation's defense against animal and **PLANT** disease threats," said Jay Cohen, Under Secretary of S&T."

"A joint activity with the departments of Agriculture and the **HEALTH AND HUMAN SERVICES**, the NBAF will address biological and agricultural security risks in a state-of-the-art Bio Safety Level 4 (BSL-4) facility. The facility will be equipped with numerous laboratories to conduct research involving diseases that may be **TRANSMITTED BETWEEN HUMANS**, diseases that may be transmitted from animals to humans, as well as and foreign animal diseases."

FEDERAL REGISTER: JULY 31, 2007 (VOLUME 72, NUMBER 146):

Comment No: 1 Issue Code: 1.0

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. Therefore, it is highly unlikely that future work would be conducted on strictly human pathogens.

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"Consultations between DHS and the United States Department of Agriculture (USDA) on a coordinated biodefense strategy called for in Homeland Security Presidential Directives 9 and 10 have revealed a gap that must be filled by an integrated research, development, test and evaluation (RDT&E) infrastructure for combating bio and agro terrorism threats."

"The proposed NBAF is envisioned to provide the nation with the first integrated agricultural, zoonotic disease, and **PUBLIC HEALTH** RDT&E facility with the capability to address **THREATS FROM HUMAN PATHOGENS**, high consequence zoonotic disease agents, and foreign animal diseases."

FEDERAL REGISTER: JUNE 27, 2008 (VOLUME 73, NUMBER 125):

"Consultations between DHS and the United States Department of Agriculture (USDA) on a coordinated biodefense strategy called for in Homeland Security Presidential Directives 9 and 10 have revealed a gap that must be filled by an integrated research, development, test, and evaluation (RD&T) [sic] infrastructure for combating bio and agro terrorism threats. DHS S&T is responsible for filling this gap in a safe, secure, and environmentally sound manner. The proposed NBAF is envisioned to provide the nation with the first **INTEGRATED AGRICULTURAL ZOOONOTIC DISEASE AND ANIMAL HEALTH** RD&T facility with the capability to address **THREATS FROM HIGH CONSEQUENCE ZOOONOTIC DISEASE AGENTS AND FOREIGN ANIMAL DISEASE.**"

2|2.0 | 1. WHAT HAPPENED TO THE DEPARTMENT OF HEALTH AND HUMAN SERVICES? HHS IS PART OF THE PRESIDENTIAL DIRECTIVES 9 AND 10 THAT ARE REFERENCED. THIS WAS NOT ADDRESSED IN THE DEIS.

1 cont.| 1.0 | 2. WHAT HAPPENED TO PUBLIC HEALTH AND THREATS FROM HUMAN PATHOGENS? WHAT ABOUT PLANT DISEASES AS MENTIONED BY JAY COHEN? HAS THE MISSION OF NBAF CHANGED OVER TIME? THIS WAS NOT ADDRESSED IN THE DEIS.

3|23.0 | 3. ARE HUMAN PATHOGENS GOING TO BE STUDIED AT NBAF? ARE DISEASES THAT MAY BE TRANSMITTED BETWEEN HUMANS GOING TO BE STUDIED AT NBAF? IN ANY CASE, HOW IS THE ANALYSIS OF ONLY THREE DISEASES IN THE DEIS APPROPRIATE FOR DETERMINING RISK? HOW DOES THE ANALYSIS OF ONLY THREE DISEASES (FMD, RIFT VALLEY FEVER, AND NIPAH) IN THE DEIS EFFECTIVELY "BOUND THE HAZARDS, ACCIDENTS, AND CONSEQUENCES" FOR NBAF? THIS WAS NOT ADDRESSED IN THE DEIS.

4|21.0 | 4. DHS HAS RELEASED A VERY SHORT INDICATIVE LIST OF EIGHT "DISEASES OF INTEREST" TO BE STUDIED AT NBAF. BUT NBAF'S MANDATE UNDER PRESIDENTIAL DIRECTIVE IS TO RESEARCH COUNTERMEASURES FOR INCORPORATION INTO THE NATIONAL VETERINARY STOCKPILE (NVS). THE CURRENT LIST OF DISEASE THREAT PRIORITIES FOR THE NVS INDICATES 17 DISEASES. THESE DO NOT APPEAR ON DHS' LIST OF "DISEASES OF INTEREST". EXPLAIN THE DISCREPANCY BETWEEN THE SHORT "DISEASES OF INTEREST" LIST AND THE PRESIDENTIAL DIRECTIVE. EXPLAIN WHY AVIAN INFLUENZA AND NEWCASTLE DISEASE ARE LISTED IN THE FEASIBILITY STUDY BUT NOT IN THE DEIS.

3 cont.| 23.0 | 5. WHAT IS THE PROCESS FOR PLACING A DISEASE ON THE LIST FOR STUDY AT NBAF? HOW DOES A DISEASE BECOME "INTERESTING"? WHO DETERMINES THE THREAT? WHO DETERMINES THE RISK?

4 cont.| 21.0 | 6. WHAT ARE THE DISEASES THAT ARE CURRENTLY HOUSED AT PLUM ISLAND THAT WILL TRANSFER TO NBAF? THESE MUST BE LISTED AND CONSIDERED TO EFFECTIVELY "BOUND THE HAZARDS, ACCIDENTS, AND CONSEQUENCES" FOR NBAF.

Comment No: 2 Issue Code: 2.0

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

Since the inception of the NBAF project, DHS has supported a vigorous public outreach program. DHS has conducted public meetings in excess of the minimum required by NEPA regulations; to date, 23 public meetings have been held in the vicinity of NBAF site alternatives and in Washington, D.C. to solicit public input on the EIS, allow the public to voice their concerns, and to get their questions answered DHS has also provided fact sheets, reports, exhibits, and a Web page (<http://www.dhs.gov/nbaf>). Additionally, various means of communication (mail, toll free telephone and fax lines, and NBAF Web site) have been provided to facilitate public comment. It is DHS policy to encourage public input on matters of national and international importance.

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

Comment No: 3 Issue Code: 23.0

DHS notes the commentor's concern regarding the NBAF. As described in Chapter 1 of the NBAF EIS, DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President.

Comment No: 4 Issue Code: 21.0

See Comment No. 1.

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2 cont. | 2.0

ATHENS AREA CITIZENS WERE NOT EDUCATED ABOUT THE POTENTIAL RISKS FROM NBAF. THE DISEASES THAT WILL BE HOUSED IN NBAF HAVE NOT BEEN SUFFICIENTLY IDENTIFIED. USING THREE DISEASES TO "BOUND THE HAZARDS, ACCIDENTS, AND CONSEQUENCES" FOR NBAF IS INADEQUATE.

THESE ISSUES SHOULD BE ADDRESSED IN THE NBAF FEIS.

Respectfully submitted,

Kathy Prescott
Co-Founder, *FAQ, inc.*
For Athens Quality-of-life

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From: Kathy Prescott [preskat@bellsouth.net]
Sent: Sunday, August 24, 2008 5:35 PM
To: NBAFProgramManager
Cc: director@athensfaq.org
Subject: COMMENT: Field Support Services, Inc.

Dear Mr. Johnson,

1| 23.0 | The DEIS failed to address the extent to which Field Support Services, Inc. will be involved in
 2| 15.2 | NBAF. You have said that FSSI will transfer from Plum Island to NBAF. The Athens area
 community needs to know the details of the extensive involvement of this contractor and what
 that means to the community as far as jobs are concerned. How many jobs will transfer with
 FSSI? To what extent will FSSI benefit the Athens economy?

THIS INFORMATION NEEDS TO BE ADDRESSED IN THE FEIS.

Respectfully submitted,

Kathy Prescott
 Co-Founder, *FAQ, inc.*
 For Athens Quality-of-life

Comment No: 1 Issue Code: 23.0

DHS notes the commentor's concerns. As stated in Section 2.2.2. of the NBAF EIS, the NBAF may be operated as a Government Owned/Government Operated Facility (GOGO) or as a Government Owned/Contractor Operated Facility (GOCO).

Comment No: 2 Issue Code: 15.2

DHS notes the commentor's statement regarding employment. The number of short-term and permanent jobs are discussed in Section 3.10.3 of the NBAF EIS. It is expected that approximately 2,700 direct temporary jobs would result from construction of the NBAF, with many of the jobs being filled locally. Approximately 483 permanent jobs, including the initial 326 direct jobs, would result from operation of the NBAF. Permanent employees will include scientific and support staff as well as operations, maintenance and security staff. A portion of the permanent jobs at the NBAF will be filled locally such as the operations, maintenance and security staff positions. Some of these positions may not require extensive specialized training and could be suitable, with some training, for the unskilled labor force. In addition, the household spending by new residents and the operations of the NBAF are expected to indirectly support additional jobs that will be filled by the local labor force, with some job positions offering opportunities for unskilled workers to enter the labor force.