

December 23, 2020

Daniel P. Murray  
Manager, Safety Authorization Division  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington DC 20591  
**Attn: Stacey Zee**

**RE: Construct/Operate Commercial Space Launch Site, Spaceport Camden, Woodbine  
Camden County, Georgia  
HP-151117-001**

Dear Mr. Murray:

The Historic Preservation Division (HPD) has reviewed the additional information submitted concerning the above referenced project. Our comments are offered to assist the Federal Aviation Administration (FAA) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). **In order to complete our review and concur with your determination of effect, HPD is in need of additional information.**

The subject project consists of the construction of a spaceport complex, and its subsequent operation, in Woodbine. The construction of the spaceport was previously determined to have no adverse effect on multiple National Register of Historic Places (NRHP)-eligible historic properties, with two (2) conditions. Due to unknown impacts from the operation of the spaceport, a draft programmatic agreement (PA) was subsequently submitted. The current submitted information includes a revised assessment of effect due to a revised operator application. It is HPD's understanding that the proposed operation now includes small-lift launch vehicles rather than medium-large launch vehicles initially proposed.

As submitted, HPD is unable to concur with the FAA's assessment of effect without additional information. Based on the additional information provided by the FAA, other consulting parties, and discussions with the Advisory Council on Historic Preservation, it is HPD's understanding that the revision in vehicle type has increased the probability of launch failures due to the proposed small-lift vehicle type. Therefore, it appears to HPD that only a portion of the potential impacts have been considered and, considering the additional impact potential, that the area of potential effect (APE) should be increased in order to include historic properties that could be impacted. HPD recommends increasing the APE to include areas under the trajectory of a vehicle's failure that could be impacted by indirect and reasonably foreseeable effects, such as debris impacts, fire, and other rocket failure safety concerns. Subsequently, HPD recommends then assessing all known indirect and reasonably foreseeable effects, including not only light pollution, audible, and vibration, but impacts resulting from launch failures. Furthermore, due to a revised proposed project scope and additional impacts identified, HPD recommends continuing public participation efforts through re-engaging previously consulted organizations and engaging additional entities, as needed.

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We look forward to receiving revised identification and assessment efforts, once available. Please refer to project number **HP-151117-001** in any future correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact me at (404) 486-6376 or [jennifer.dixon@dca.ga.gov](mailto:jennifer.dixon@dca.ga.gov).

Sincerely,  


Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning

cc: Sarah Stokely, ACHP  
Kevin Lang, Little Cumberland Island  
Betsy Merritt, NTHP  
Beth Byrd, NPS  
Queen Quet, Gullah/Geechee Sea Island Coalition