



United States Department of the Interior



NATIONAL PARK SERVICE

Atlanta Federal Center
1924 Building
100 Alabama Street, SW
Atlanta, GA 30303

IN REPLY REFER TO:

1.A.2 (SERO-PC)

December 10, 2020

Mr. Daniel Murray
U.S. Department of Transportation
Federal Aviation Administration
800 Independence Ave., SW.
Washington, DC 20591

Dear Mr. Murray:

The National Park Service (NPS) has reviewed the Draft Final Spaceport Camden Environmental Impact Statement (DFEIS), Section 4(f) Evaluation, and National Historic Preservation Act (NHPA) Section 106 Assessment of Effect for the Proposed Issuance of a Launch Site Operator License to the Camden County Board of Commissioners (County), Georgia. We offer the following comments for your review and action:

NPS Section 4(f) Resources

The NPS notes that the County has revised its Federal Aviation Administration (FAA) application altering the proposed action from medium-large launch vehicles to small launch vehicles as defined in Title 14 Code of Federal Regulations (CFR) Part 420. In addition, the proposed launch trajectory has been changed from an 83- to 115-degree range to a single 100-degree trajectory.

Table ES-1 states, “*Although Overflight Exclusion Zones (OEZ) and U.S. Coast Guard (USCG) Security Zones would be established to restrict access to areas near the spaceport during launch activities, these would not result in closures of or restricted access to any Section 4(f) properties.*” The DFEIS details that the USCG will control access to the Security Zone during launch activities as depicted in Exhibit 2.1-10 - *Composite Launch USCG Security Zone and Limited Access Areas (100-degree Trajectory)*. Based on our review of the DFEIS, exhibit 2.1-10 depicts three security check points located within the Cumberland Island National Seashore (CUIS) that would limit access in the park. Furthermore, the Composite USCG Security Zone in Exhibit 2.1-10 encompasses the northern half of CUIS. The DFEIS as written contradicts the restriction statements and indicates the FAA and County are proposing restricted access and closures to NPS’ resources.

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The DFEIS notes throughout the document that, “*Failures in flight could result in the destruction of the vehicle either to the failure itself or as the result of a destruct signal generated by flight termination system.*” The DFEIS goes on to state, “*The County would require operators to employ flight safety limits that ensure any debris or surviving components impact within the launch site boundary, the OEZ, or the USCG Security Zone.*” Based on these statements and the breadth of the proposed USCG Security Zone, NPS believes there is a significant risk to CUIS that is not adequately addressed in the document.

Based on our review of the DFEIS, the conclusions related to use of NPS Section 4(f) resources are not substantiated. The DFEIS states in the Executive Summary, “*The USCG Security Zone, which is not an FAA requirement, represents both the land and water area controlled in accordance with the Comprehensive Launch Plan and is consistent with the County’s Launch Site Operator License Application...*” NPS contends the USCG Security Zone is a consequential requirement as a direct result of FAA’s and the County’s proposed action. This should be addressed in an updated version of the Final EIS.

It should be officially noted that NPS, as a formal cooperating agency under the National Environmental Policy Act of 1969 as amended, was not provided a copy of the referenced Comprehensive Launch Plan and accompanying Safety Report for our review despite several requests. This severely limits our ability to conduct a thorough analysis of the proposed action and potential for adverse impacts to CUIS associated with the proposed operations of Spaceport Camden.

NHPA Section 106

The Section 106 documentation needs additional information for the NPS to evaluate the finding of effect. The Area of Potential Effect (APE) is not substantiated by the change in launch vehicle size. The NPS requests more documentation to support the limited APE or an increase of the indirect APE to account for variables related to launches. The Safety Report would provide helpful information when understanding the concerns related to potential launch failures. The NPS also requests the Gullah Geechee Cultural Heritage Commission be included in agency consultation. We recommend providing this information as part of specific Section 106 consultation with all consulting parties to address any potential adverse effects to historic properties.

Specific Comments

Section 3.0 - Cultural Landscape

1. Page 3-70, Line 25 - The CUIS cultural landscape should not be described as a “*historic vernacular landscape*” as both Dungeness and Plum Orchard had historic designed landscapes as described in the cultural landscape reports for both historic districts.

Section 3.12.1.3

1. Page 3-92, line 9 - This section states that Brickhill Bluff is the only campground within the USCG Security Zone. Yankee Paradise campground is very close to the boundary and may be within the security zone. Additionally, the park is in the planning stages to remove wilderness campgrounds at current locations and place them at Toonahowie and

Sweetwater lakes, both of which are within the USCG Security Zone. The purpose is to provide opportunity for wilderness experience more in line with wilderness guidelines of solitude, less social, and lower density. It would also better manage potential human impacts on the wilderness environment.

Section 4.2 - Biological Resources

1. The DFEIS does not consider the federal designated Eastern Black Rail as a threatened species and does not account for the availability of habitat located on CUIS, within the USCG control area.
2. It is unknown how the Eastern Black Rail responds to high-intensity noise pollution, transitory or constant.
3. No surveys have been undertaken at CUIS to determine the presence of the Eastern Black Rail.

Section 4.8.1.2 - Historical, Architectural, Archaeological, and Cultural Resources

1. Page 4-58-59, Line 44 - NPS does not agree with the statement that these visual intrusions are not an adverse effect to the cultural landscape that diminishes integrity of setting. There is a cumulative effect of 12 launches as well. Structures and lights would be visible from National Register-listed historic districts on Cumberland Island that lies within the indirect Area of Potential Effect, introducing elements to the setting of the historic landscape that affect a key characteristic of its eligibility. These intrusions represent adverse effects, particularly when combined with operations impacts:
 - a. A change in the character of historic property's setting
 - b. Introduction of audible visual or atmospheric elements that diminish the integrity of a property's historic features

Section 4.9.1.2 - Operation

1. Page 4-67 - Will boaters/kayakers at Brickhill Bluff Campsite be able to access or leave the campground during this period?

Section 4.11.1.2 - Noise and Noise-Compatible Land Use

1. Noise from daily operations, launches, and support activities may occur at levels that would detract from the perception of solitude for visitors within the CUIS Wilderness Area. The described noise levels would exceed baseline conditions and temporarily alter the soundscape of CUIS Wilderness, detracting from the solitude quality of wilderness. In wilderness areas in particular, there is a strong expectation that anthropogenic noise intrusions will be limited and infrequent. The United States Congress designated the CUIS' Wilderness Area in 1982, and it now has a total of 9,886 acres of designated wilderness and 10,500 acres of potential wilderness. Designated Wilderness is the highest level of conservation protection for Federal lands. Launches, static engine

testing, and wet testing will affect the opportunity for solitude and natural noise-levels of CUIS Wilderness Area disproportionately.

Summary Comments

NPS does not concur with the FAA's Section 4(f) conclusions at this time. We would be pleased to reconsider this position upon receipt of the documentation cited above.

NPS has a continuing interest in working with the FAA to ensure that impacts to resources of concern are adequately addressed. If you have any questions or require further information regarding CUIS resources, please contact Superintendent Gary Ingram at Gary_Ingram@nps.gov or (912) 882-4336, ext. 228.

Sincerely,

A handwritten signature in cursive script that reads "Stan Austin".

Stan Austin
Regional Director