



United States Department of the Interior



NATIONAL PARK SERVICE
Cumberland Island National Seashore
101 Wheeler Street
Saint Marys, Georgia 31558

IN REPLY REFER TO

1.A.2. (SERO-PC)

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

Dear Mr. Murray:

As a consulting party under Section 106 of the National Historic Preservation Act, Cumberland Island National Seashore (CUIS) has reviewed and commented on the Programmatic Agreement regarding the Construction and Operation of a Spaceport (HP-15117-001). The review of the Programmatic Agreement continues to shed light on the numerous aspects of this process that continue to cause concern. As an example, what is the potential for effects to historic properties from a catastrophic failure/fire and the potential need to close the park during launches that will prevent access to the park's historic properties?

We implore the Federal Aviation Administration (FAA) to revisit our previous letters and offer answers to the questions regarding the development and operation of Spaceport Camden as it pertains to the safety of our visitors and preservation of the natural and cultural resources. Those letters contain serious, unanswered concerns regarding the impact Spaceport Camden will have on CUIS's visitors, resources, and operations. If the FAA is unable to address these questions, then we strongly suggest that the process should not move forward until such time as answers can be provided. We look forward to receiving the requested information and responses to our previous comments and questions. If you have any questions or require additional information regarding CUIS resources, please contact me at gary_ingram@nps.gov or (912) 882-4336, ext. 228.

Sincerely,

Gary Ingram
Superintendent
Cumberland Island National Seashore
Fort Frederica National Monument

INTERIOR REGION 2 • SOUTH ATLANTIC-GULF

ALABAMA, FLORIDA, GEORGIA, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA,
TENNESSEE, U.S. VIRGIN ISLANDS

Comment Response Matrix

Spaceport Camden – Programmatic Agreement Consulting Party Review (May 2021)

#	Location		Type of Comment	Agency	Comment	Response / Concurrence
	Page	Line	S, A			
1	2	25-27	S	NPS	This does not appear to be accurate per Attachment C (pg 27 of PA) and subsequent correspondence to the NPS regarding effects to the cultural landscapes in CUIS.	
2	5	10	S	NPS	What percentage of plan development (30%, 50%, ??) will the invited signatories be able to review at the first opportunity?	
3	5	44	S	NPS	If the final plans for construction determine a course of action which will cause an adverse effect-how will that be resolved? There seems to be a disconnect between this phase of work (development, review, and approval of documents), and an additional assessment of effect based on the plans for construction (A and B on page 26).	
4	9	20	S	NPS	This resolution of adverse effects seems to be focused on actions outside of effects from the construction of the facility only.	
5	2	3	a	NPS	(22), is this a page number reference?	
6	3	15	A	NPS	Do you mean the Gullah Nation not Gullah/Geechee Commission?	
7	7	41-44	S	NPS	How or will the plan establish baseline data where none exists?	
8	9,11	26, 36	S	NPS	What if the Adverse Effect cannot be mitigated and the signatories do not agree with proposed actions moving forward	
9	9	23		NPS	Who is to fund the mitigation efforts if it is repair, additional documentation, etc? The affected party?	
10	27	Attachment A		NPS	Potential Source of Effect does not list fire or falling debris	

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11	5	10		NPS	Still waiting on plans that could help clarify issues and address NPS concerns.	
12	7	9		NPS	Section IV does not adequately address the possibility of destruction of park resources (natural and cultural) if a catastrophic accident were to happen.	
13	8	7		NPS	What happens if there is damage/injury to park resources?	
14	8	7		NPS	It is described and understood that a robust monitoring program would be established on Park lands. Who would do the monitoring and at who's expense?	
15	9	15		NPS	Section V: As it stands right now, the Park has deep concerns about this project moving forward without having all of our questions addressed.	
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	Page	Line	S, A			
26						
27						
28						
29						
30						

To add additional rows, place cursor in the bottom right cell and hit << Tab>>.

Comment Types: S= Substantive; A=Administrative (See definitions below)

DEFINITIONS

Substantive – Comments identifying an item in the document that appears to be, or is potentially, incorrect, misleading, or confusing.

Administrative – Comments identifying minor inconsistencies between different sections or errors in typography and grammar.

Reviewer: Please provide your initials