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June 12, 2018

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Ms. Stacy M. Zee  
Environmental Specialist  
Office of Commercial Space Transport  
Federal Aviation Administration (FAA)  
800 Independence Avenue SW  
Washington, DC 20591

RE: Georgia Conservancy comments regarding Spaceport Camden, Draft  
Environmental Impact Statement (dEIS)

Dear Ms. Zee:

The Georgia Conservancy is pleased to provide comments for the proposed Spaceport Camden dEIS. This comment letter is part of the FAA environmental review process, so it will focus on the ecological setting and environmental impacts of the spaceport and its operations. Thus this letter leaves for later consideration by the County Commission and taxpayers the related issues of a speculative spaceport's feasibility and unresolved property (public and private) rights issues wrought by launch hazard exclusion zones.

Founded in 1967, The Georgia Conservancy is one of Georgia's oldest nonprofit conservation organizations. Working to protect our coast for more than 50 years, the Georgia Conservancy is a statewide conservation organization whose goal is to develop practical solutions for protecting Georgia's environment. We develop policy decisions under a vision statement centered on *a Georgia where people and the environment thrive*. The magnitude of the proposed spaceport, at this critical location, is of significant ecological concern. The comments and questions in this letter are derived from our Coastal Policy and are based on the limited amount of development and operation data available in the draft Environmental Statement (dEIS).

This letter is organized in a manner similar to the Georgia Conservancy EIS Scoping Comments letter dated January 14, 2016 ("Scoping Comments") with three topical areas:

1. Property-specific related comments that include the past use as a rocket testing and munitions manufacturing facility and the future as a spaceport,
2. Comments on the dEIS coverage of environmental impacts to adjoining sites and landscape-scale natural resources, and
3. Environmental issues at a larger scale (county and regional).



Ms. Zee  
Page 2

Please note that in order to focus attention on the lack of conclusive dEIS detail, *major points in this letter are italicized* if they *restate a question or have basis in statements* from the Georgia Conservancy's January 2016 Scoping Comments.

1. Site specific development, mitigation and conservation measures:

*Rigorous application and coordination of existing laws and regulations — especially Georgia's Coastal Marshlands Protection Act, Shoreline Protection Act, Coastal Management Plan and Program Guidelines, as well as the federal Clean Water Act — are critical to preserving the coast's ecological integrity as human activity expands. When will the federal consistency review by the Coastal Resources Division (CRD) of Georgia Department of Natural Resources (DNR) be completed? When the federal consistency review is completed, how will the findings (impacts, mitigation, etc.) be incorporated into the EIS? The State of Georgia has a unique and effective stewardship role with respect to coastal marshlands, waterbottoms and estuarine systems that is critical to preserving the integrity of the saltmarsh ecosystem and the public's safe access and enjoyment of our common coastal treasures.*

*Will the information related to the recent (proposed) Todd Creek stream bank stabilization project be included in the EIS considerations? There is a 58-acre unlined industrial landfill directly next to Todd Creek, adjacent to the northwest corner of the spaceport site. The dEIS lacks detail on current site conditions related to the landfill and its groundwater plume. Seepage of the contaminated groundwater from this landfill has the potential to contaminate Todd Creek from the adjacent high sandy bluff that borders the site. A preliminary vibration study by Tetra Tech was referenced in the dEIS (page 4-14, line 32), but no conclusions or mitigation related to this analysis was given. When will consultation with the Georgia Environmental Protection Division (EPD) of the Georgia Department of Natural Resources (DNR) be complete with respect to the spaceport impact on toxic groundwater and its management under RCRA permit?*

*Every water body has a carrying capacity in terms of point and nonpoint pollution inputs, bank erosion and safe navigation. Potential harm to marine mammals from spaceport operations is a critical limiting factor that must be respected. When will the consultation with National Marine Fisheries Service (NMFS) be completed, and how will mitigation and monitoring for impacts be incorporated into the EIS?*

*How will "lessons learned" from other recent spaceport construction projects be incorporated into the Spaceport Camden Project? The following information is mentioned in the dEIS, but is missing from Section 6, mitigation or operational recommendations: Environmental Management System, Hazardous Materials Emergency Response Plan, and an updated Institutional Control Plan (ICP) for the hazardous materials.*



*Is it feasible for the site design at Spaceport Camden to reuse the existing onsite industrial footprint and facilities (roads/wastewater/fire suppression)?* No feasibility or involvement of the design team was noted in the dEIS sections that dealt with reuse (Section 2.1.6 (Infrastructure) on page 2-14). It does not appear that there was consideration given to the reuse of the onsite industrial footprint.

*How will related (offsite) industries that locate near the spaceport on adjoining sites treat their waste water?* The dEIS does not deal with offsite infrastructure impacts.

*What are the site related planning and permitting issues for waterfront areas and over-water operations (flights, explosions, etc.)?* The launch facility and its impacts from catastrophic events on marsh, rivers and the adjacent islands is not discussed in the dEIS. Launch mishaps are mentioned as being rare. However for such a pristine area such as the estuary or in ecologically important wilderness such as Cumberland Island, a failure should be accounted for with some type of demonstrated analysis in the dEIS. The dimensions of the hazard area are not clearly established (page 3-33, lines 34-35). What will be the “Overflight Exclusion Area”? Who are “authorized persons” and will they be allowed to remain in the hazard area during launch operations?

*What will be the total impact to streams, wetlands and marshes for the spaceport and related facilities? What mitigation measures are planned?* Spaceport Camden is a small-footprint project on a large parcel. The construction footprint is relatively small and as such, the direct wetland impacts for the construction of the pads, access roads and related construction are limited. What will be the catastrophic scenario analysis of impacts to wetlands, especially marshes?

*How will sea level rise considerations be incorporated into the site design?* There is no mention of sea level rise and climate change as they relate to site design. There is reference that due to the coastal location, the area is likely to be more susceptible to the potential for impacts brought by climate change (page 3-27 lines 14 -15). Other protective measures such as using existing hurricane evacuation routes are also mentioned in the same section.



*Will the design documentation for the site include an assessment of both site-specific and cumulative impacts with an eye toward the overall carrying capacity of our estuaries?*

There is a noted lack of adaptive management and best practices mandated in the mitigation sections of the dEIS. The primary mentions of protections are references to existing laws and regulations. This sets in place only minimal protections and no monitoring or mitigation measures for operational impacts on the marshes or on the Saint Andrews Sound estuary.

2. Impacts to adjoining sites and landscape scale natural resources include:

Barrier island wilderness, refuges and other coastal public lands are incomparable resources that provide clean air and water, safeguard biological diversity, offer people a safe haven for solitude, enjoyment and spiritual renewal; and preserve an unspoiled natural heritage for future generations.

*This area is one of the highest-functioning estuarine ecosystems on the East Coast of the United States and, as such, has extensive value to plants, animals and the people of Camden County and the State of Georgia.* Will the EIS have agency consultation (National Park Service (NPS) on the status, protection, and boundaries of the Satilla River estuary pertaining to its listing in the Nationwide Rivers Inventory (NRI)?

*What will be the project related impacts to Cumberland Island, Jekyll Island, Raccoon Key and Little Cumberland Island?* It is important to note that substantial agency-related comments are missing from the dEIS including:

- Section 4(f) responses (operational input and mitigation) from the National Park Service (NPS) pertaining to Cumberland Island National Seashore (CINS). Has there been a determination of “constructive use” for CINS? There was no clear statement about constructive use other than references to some preliminary findings.
- Section 4f responses of the Jekyll Island Authority pertaining to Jekyll Island State Park

The Georgia Conservancy has been involved with Jekyll Island and Cumberland Island conservation issues for more than 50 years, and we take these findings very seriously. Stewardship of our state and national parks is a legacy for Georgia Conservancy and thus provides a policy lens through which we view Spaceport Camden.

*How will property rights issues be enforced for privatized spaceport operations related to the exclusion zones and other limitations on offsite property?* The dEIS did little to address concerns over what areas must be evacuated during launch operations on Cumberland and Little Cumberland. This includes private property rights and operational issues for these remote islands that only have access via boat and where visitors or landowners often plan visits months ahead of time. Please see the site-related comment on page 3 of this letter for concerns related to this unaddressed question.



Ms. Zee  
Page 5

A sustainable coastal ecosystem is vital to the Georgia's prosperity. It is essential to promote a healthy, resilient and diverse coastal ecosystem that can endure natural and human disturbances, continue to perform its functions, and support self-sustaining populations of native fish, birds, wildlife and plants.

*How will this project and the related development impact the critical habitat that is located on this site and adjoining properties (Bayer, Ceylon, Cabin Bluff, etc.)? Construction of site roads, support supplier facilities, and future expansion of the spaceport industry in Camden County will have a direct impact on the habitat that supports the gopher tortoise, indigo snake and a number of other rare plants and animals. Much of the habitat in this area is ranked as globally significant (G2 and G3) under the NatureServe habitat ranking system. This includes unusual combinations of proximate mesic longleaf pine on higher sandy soils and rare forested (hydric) wetlands, which benefit wildlife greatly. There are portions of this site which have high ecological function. How will these areas be preserved and enhanced to offset impacts and benefit the ecosystem?*

The dEIS shows consultation with United States Fish and Wildlife Service (USFWS) and NMFS yielded an extensive list of conservation measures to minimize potential effects to biological resources (See Appendix A, Public Involvement/Agency Coordination and Consultation). These recommendations are not developed into a comprehensive framework for managing the site or spaceport operations. Indeed the dEIS does not take advantage of the manner in which the remaining higher-value habitats (longleaf and wire grass, freshwater wetlands, etc.) could be managed to offset impacts from Spaceport construction and operations.

Responsible planning for growth and conservation of sensitive coastal lands is essential to preserving the integrity of natural coastal systems and, in turn, the health and welfare of coastal Georgians.

*What specific sound mitigation and operational measures will be taken to protect surrounding properties and wildlife?* The mitigation section for sound and noise impact is very limited in scope. Such limited accommodations are odd because the dEIS noise analysis is thorough, but there are no operation parameters spelled out in the Section 6.11 (Noise and Noise Compatible Land) recommendations. No site-specific operation or mitigation sound measures are given in this section.

*What role have Stratford Properties (Ceylon) Cabin Bluff and other adjoining property owners played in the planning of site design, conservation and mitigation measures?* None are noted in the dEIS.



Ms. Zee

Page 6

Environmental issues at a larger (county, Georgia/Florida, ocean ecosystem) scale include:

Georgia's estuarine and saltmarsh ecosystems, which adjoin the Spaceport Camden site, provide a nursery for commercially and recreationally valued species of fish, shellfish and other wildlife, as well as a valuable recreation resource. These coastal land and water resources provide habitat for more threatened and endangered species than any other region of the state. The sum of these resources is a highly integrated, interdependent ecosystem that is vitally linked to Georgia's economy and quality of life.

*It is important for southeast Georgia and Camden County to have an economy that offers diverse options including healthy, sustainable nature-based businesses such as commercial fishing and recreation-based tourism. What will be the Spaceport Camden's economic impact on local shrimping, clam farmers and oyster harvesters?*

*How will the spaceport operations address migration patterns, foraging and local nesting areas for threatened and endangered bird species? How will the survey and consultation for the EIS specifically address high priority species such as the bald eagle, glossy ibis, black-crowned night heron and local wading bird colonies? USFWS consultation references conservation plans, however in the related mitigation section, these plans are not mandated planned for implementation. These include the Protected Species and Habitat Management Plan, Lighting Management Plan (Light Management Plan, Artificial Light Management Plan) and Wildland Fire Management and Burn Plan.*

*How will the operational and contingency plans for the Spaceport Camden address fisheries and marine mammal (right whale and manatee) impacts? (See comment on pending NMFS consultation, above)*

*Will the EIS process include the results of planned economic studies that the Spaceport Camden Steering Committee or other groups undertake as part of this project? Will the results of the Georgia Southern University Bureau of Business Research and Economic Development (BBRED) study and other materials be incorporated into the EIS?*

It is important for Camden County and other coastal communities to use smart growth practices to promote compact patterns of growth that: 1) are located away from environmentally unsuitable areas (i.e., sensitive coastal resources and areas prone to flooding and storm surge); 2) are sited, designed and constructed to respect, restore and maintain ecosystem functions; and 3) engender respect by the people who live there for the land and water around them.



Ms. Zee  
Page 7

*How will the County Comprehensive Land Use Plan (CLUP) be updated to reflect the conservation, residential, recreational and industrial uses planned in and around this project? Will a local planning study guide the related industrial development that provides economic benefits to Camden County? Will overlay zoning or local tax incentive districts (TAD, CID, etc.) be used as part of the planning and incentives package for local spaceport related businesses? The federal NEPA process may not require advanced local (county) planning analysis and process. However, it would benefit the County and integrate the Spaceport project into the landscape more effectively. Thus this series of questions is not dealt with in the dEIS, however such analysis and planning districts could be of significant benefit to the County and should be included in the project planning process at the County level.*

*Has consideration been given to creative use of conservation resources (easements, transfer of density rights, development boundaries, etc.) in the preservation of sensitive habitat and buffering of the site? This is not included in the dEIS analysis or in the mitigation measures.*

For the reasons stated above, the Georgia Conservancy has significant concerns from an environmental and ecological perspective related to the development and operations for Spaceport Camden and the related ancillary development that would support the enterprise. We look for a judicious and comprehensive review of all questions submitted to date.

Sincerely,

A handwritten signature in black ink, appearing to read "CH. McMillan, III".

Charles H. McMillan, III  
Coastal Director