



Ms. Stacey M. Zee
FAA Environmental Specialist
Spaceport Camden EIS
c/o Leidos
2109 Air Park Road, SE, Suite 200
Albuquerque, NM 87106

June 14, 2018

Dear Ms. Zee,

On behalf of National Parks Conservation Association (NPCA) and our 25,000 members and supporters in Georgia and 1.3 million nationally, we respectfully submit these comments on the Draft Environmental Impact Statement (DEIS) for Spaceport Camden, by the Federal Aviation Administration (FAA) Office of Commercial Space Transportation(OCST). Since 1919 NPCA has been the leading voice in safeguarding our national parks. NPCA and its more than one million members and supporters work together to protect and preserve our nation's natural, historical, and cultural heritage for future generations.

NPCA has reviewed the Draft Environmental Impact Statement (DEIS) prepared for Spaceport Camden and requests that the FAA reconsider the preferred action and choose the no action alternative, thereby terminating this process to license a spaceport operation in Camden County Georgia.

FAA 's Office of Commercial Space Transportation must seriously consider their role and the national scope of their responsibility to the people of the United States. The simple fact is that the eastern boundary of Camden County, Georgia is an inhabited barrier island, a designated National Seashore, and a unit of the National Park System. In 1955 the National Park Service (NPS) identified Cumberland Island as second only to Cape Cod in places of national significance along the Atlantic and Gulf Coast. In 1972 it was added to the National Park System by Congress. There is no appropriate location for a spaceport in Camden County that does not require a launching trajectory over the national seashore, creating a trajectory hazard area and closure. As one commenter exclaimed in the scoping process, "THIS IS ABSURD! CERTAINLY, THERE ARE MANY OTHER OPTIONS! :("



FAA's Purpose and Need:

The FAA's responsibility under the Commercial Space Launch Act (CSLA) is national in scope. The fault in the selection of the preferred alternative in this Draft EIS is that it only looks at Camden County Georgia which is too narrow a scope for this federal agency. This issue was raised in scoping comments but because it did not meet the County's need to develop a spaceport, it was dismissed. Under the statutory direction of Congress, FAA is charged with protecting public health and safety, and safety of property, in addition to encouraging commercial space launch and reentry activities by the private sector. In order to fulfil its Congressional mandate, FAA must look at the national scope of the United States (U.S.) space transportation needs, and determine locations that are appropriate, for specific activities that encourage, facilitate, and promote activities by the private sector to strengthen and expand U.S. space transportation infrastructure.

This DEIS is limited in scope by a claim of fulfilling Camden County's economic needs. That is not an appropriate reason to permit a commercial space launch site in Camden County, GA. There is no guarantee that it will produce the economic growth and sustainment that Camden County seeks. The DEIS burdens the commercial launch operator with the task of adhering to environmental and safety regulations that were brought to FAA's attention during scoping and references discrete environmental reviews for commercial launch operators who wish to operate their vehicle from Spaceport Camden. Does this take further environmental review out of the public process?

The DEIS primarily deals with a construction project on contaminated land. In some cases, it limits itself to the impacts of a construction project to build the spaceport. In other places it attempts to address, but significantly downplays, the actual impact of rocket launches, landings and test firing on the National Seashore resources and visitor experience. It is inadequate in addressing the cost of closures to CUIS and other Section 4 (f) areas such as Crooked River State Park, and vital transportation, recreation, and commercial fishing corridors such as the Intracoastal Waterway and St. Andrew Sound, as protected by the Public Trust Doctrine.

According to the need and purpose of the DEIS, "the need for the proposed action is to further the goals of Camden County... to create a strong regional economy ... by developing a world-class spaceport that would attract business to support its operation." Nowhere is it borne out

or supported that choosing this preferred alternative action will fulfill this need. Based on FAA's own data, it appears that commercial spaceports located near or in coordination with military or NASA facilities have the greatest success in attracting commercial clients.

FAA's FY 17 Commercial Space Data shows that in calendar year 2017, there were 10 licensed site operators in the United States (US), to provide sites for 12 licensed launches across the country. Camden proposes 12 launches a year but provides no market research to identify a customer base for operations or launches. In the Final Report of the GA State Senate Study Committee on Camden County Spaceport, Mr. Stephen Fleming, founder of Boostphase, noted that when companies look for launch sites, they look at FAA accreditation, location, and infrastructure. FAA's data shows that licensed launches are taking off at Kennedy Space Center, Vandenberg Air Force Base and the Mid Atlantic Regional Spaceport, all world-class spaceports with existing and significant infrastructure, including ports, appropriately located to launch rockets over open ocean.

There is no reason why Camden County, GA cannot participate in the commercial space industry, and satellite and ground equipment manufacturing may be viable if the County recruits those industries. But not every county on our nation's coast is an appropriate location for launching and landing rockets. Camden County, Georgia may in fact be the most inappropriate location the FAA could choose to permit a launch site operator's license.

By proceeding with the preferred alternative, FAA ignores the best interest of the commercial space operator who seeks a site to launch rockets, U.S. and Camden County taxpayers, the public trust, protection of the national park's visitor use and experience and the natural, cultural and historic resources that are intrinsic to Cumberland Island National Seashore.

This action, to issue a Launch Operators License to the Camden County will create substantial adverse impacts to Cumberland Island National Seashore (CUIS). Additionally, the construction of a spaceport and subsequent launch of commercial vehicles over the national seashore results in constructive use in violation of the Department of Transportation Act of 1966 which creates special protections for national park units and lands listed as historic sites on the Federal Register. Section 4 (f) states that federally assisted transportation projects may not use land from historic sites, national park units, or other environmentally sensitive-areas unless

there is no feasible alternative and the project uses all possible planning to minimize any potential harm to the environment or site.

The proposed alternative fails to provide appropriate protection to Cumberland Island National Seashore's natural, cultural and historic resources, the safety of the national seashore's visitors and National Park Service (NPS) staff.

Cumberland Island National Seashore

Cumberland Island National Seashore, the Intracoastal Waterway, the Colonial Birding Trail, the Georgia Bluewater Trail, and the Gullah Geechee National Heritage Area lie within the proposed Spaceport Camden launch and landing trajectory, the trajectory hazard area, and closure area. Launches, landings, and delays will force closure of these resources for public safety. Camden County has built a tourism economy primarily targeted toward ecotourism and vacation travelers. Cumberland Island National Seashore consistently brings in more than 60,000 visitors a year, who generate over \$2 million in visitor spending (\$2.6M in 2016). According to the 2017 St. Marys Convention and Visitors Bureau Authority report, tourism has generated 777 jobs and \$90.3 M in direct travel spending in Camden County. The Draft EIS fails to site an economic study or data indicating the impacts of closure to the natural and historic resources which contribute to the county's revenue.

CUIS is not a drive up national park. Visitors must make reservations, often six months in advance, for the ferry, camping spaces, and historic tours. A visitor to Cumberland must plan carefully to carry in and out all provisions they need for the length of their stay, including water and food. A small private inn accommodates guests with reservations.

CUIS is an important site for university and high school students from Georgia and across the nation who come to the island in organized groups for alternative spring break. Working with the National Park Service, students have opportunity to participate in service projects that give them experience in historic preservation, archeology, biological, and scientific research. Volunteers are also important at Cumberland Island. They serve as docents, clear trails, and assist visitors. In 2017 close to 400 volunteers served 5,500 hours at the national seashore.

In its letter to the National Park Service, the FAA states, that based on its preliminary review, CUIS may meet the criteria for protection as a Section 4(f) property. Certainly, that is the case. The DEIS makes the preliminary determination that the operations under the proposed action would not result in a constructive use of the parks, recreation areas, or historic sites. NPCA disagrees and requests that FAA consider the impacts of construction of the spaceport and the resulting rocket launches, landing and test activities. These activities cannot be bifurcated and will result in constructive use of Cumberland Island National Seashore.

CUIS Wilderness

The preferred alternative will result in adverse impacts to the wilderness characteristics of the island, in violation of the Wilderness Act. Cumberland Island National Seashore contains 9,886 acres of designated wilderness, with an additional 10,000 acres of potential wilderness when all existing reserved rights and non-conforming uses have expired. A total of 20,558 acres at CUIS have been approved by Congress for inclusion in the National Wilderness Preservation System. This is 80 percent of the total upland of the island. Potential Wilderness means that those 10,000 acres would become designated wilderness without any further Congressional action, once existing non-conforming uses have been terminated. The preferred Action Alternative would preclude the National Park Service's mandate to convert this potential wilderness by creating a non-conforming use with no expiration date on the horizon. Construction of a spaceport and subsequent rocket launch and landing activities over the north end of the island thwart Congressional intent.

Senator Sam Nunn, in Congressional Record S 10846 stated, "The bill constitutes a further step to reduce the impact and influence of man and his activities on the natural landscape of the island, and much of the acreage which is designated in this bill as potential wilderness will change to pure wilderness with the passage of time and the disappearance of facilities which are contrary to wilderness."

To paraphrase the NPS General Management Plan for CUIS, the wilderness at Cumberland includes biologically unique aquatic systems, extensive breeding habitat for amphibians, alligators and shorebirds including heron, ibis, egret, wood stork and ducks, spectacular floral displays and fern colonies, and the largest maritime forest on the eastern coast. The physical isolation and daily visitor cap provides visitors with outstanding opportunities for outdoor

recreation and solitude. The Wilderness Act (Public Law 88-577) mandates that wilderness 'is protected and managed so as to preserve its natural condition.'

Wilderness areas are designated by Congress 'for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness...'. "The designation of any area of any park, monument, or other unit of the national park system as a wilderness area pursuant to this act shall in no manner lower the standards evolved for the use and preservation of such park, monument or other unit of the national park system...wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use."

Alterations to the natural soundscape, light scape or viewshed can diminish the wilderness visitor's perception of solitude and in some cases may impact the natural quality of the wilderness. Although Cumberland Island is not a dark skies park as designated by the International Dark Sky Association (IDA) there is no measurable nighttime radiance on the northern half of Cumberland Island and Little Cumberland Island. In Exhibit 3.13-3 2, sites in Cumberland's Wilderness, Brickhill Bluff and Cumberland Wharf have unobstructed views of the proposed spaceport. Section 3-line 69 states that the overall viewshed quality west of the wilderness from Brickhill Bluff to Cumberland Wharf is moderate to high. That will change with construction and operation of Camden Spaceport.

Constructive Use

The DEIS makes a preliminary determination that the proposed action would not result in constructive use. Constructive use occurs when a transportation project does not incorporate land from a Section 4 (f) property, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features, or attributes of the property are substantially diminished. Section 6.5 line 19-21 states that because FAA has made the preliminary determination that the Proposed Action would not result in the use of a Section 4(f) property, no additional minimization or mitigation measures are required. NPCA disagrees.

Restriction of Access

There are several factors in determining constructive use. Perhaps most notable and egregious is restriction of access. Constructive use occurs when a project results in a restriction of access which substantially diminishes the utility of a significant publicly owned park, recreation area or a historic site. On page 10 of the Draft EIS, line 24-28 the executive summary states that the closure area would include parts Cumberland Island National Seashore. In fact, the closure area extends over the greater part of Cumberland Island's wilderness including access to wilderness campgrounds, historic and cultural resources. The closure area would also include the Intracoastal Waterway, and the Georgia Bluewater Trail, the Satilla River and a portion of St. Andrew Sound. Visitors to Crooked River State Park, Gullah Geechee National Heritage Area and the Colonial Birding Trail could also be impacted.

The DEIS downplays closures to CUIS and public recreational facilities by inadequately addressing factors that scrub launches. Weather, unauthorized personnel in the area, technical and logistical complications can delay launches for days, even weeks. The DEIS fails to determine how delays will impact park visitors and how NPS will recover revenue generated by the ferry concession.

On page 11, line 11, the DEIS references 'stakeholders that are part of the process, and provisions for "authorized persons" would also be determined and implemented (e.g. residents, vacation home owners, and permit-holding campers, NPS personnel). Should those persons wish to depart the area on Cumberland Island or Little Cumberland Island for a launch, Spaceport Camden personnel may facilitate transportation for those individuals to and from their houses or camp sites on the day of the launch.'" There are problems with this logic. First park visitors are not authorized personnel, even if they do hold a camping permit. Where does Spaceport Camden plan to take these people? How will they be compensated for the loss of their experience in the Wilderness. If the launch is delayed, where will they spend the night and at who's expense?

Noise

Constructive Use also occurs when the projected noise level increase attributable to the project substantially interferes with the use and enjoyment of a noise-sensitive facility of a property

protected by Section 4(f) such as sleeping in the sleeping area of a campground. The DEIS states that construction noise, associated with building a launch facility will not impact the visitors experience in the park's wilderness campgrounds. The DEIS goes on to state that because the noise is limited and temporary, it would not limit the use or diminish the quality such that the value of the 4 (f) properties would be impaired.

In Section 3-69 line 3-5 The DEIS notes that NPS estimates that median sound levels in the area are between 36-38 dBA based on long term measurements in the parks as well as urban and rural areas across the country. In measuring the sound impacts of rocket launches there will be a substantial impact on natural sounds in the wilderness. The DEIS includes a study by Blue Ridge Research and Consulting that indicates that the noise levels at The Settlement will be between 111 and 120 dBA and sonic booms associated with landing are not expected to affect hearing conservation or cause structural damage, assuming the structures are well maintained.

Constructive use occurs where enjoyment of a historic site where a quiet setting is a generally recognized feature or attribute of the site's significance. The north end of Cumberland Island contains several historic sites listed on the National Register of Historic Places. The Settlement and First African Baptist Church are directly in the launch path. From the original national register application for High Point Half Moon Bluff, "The establishment of the First African Baptist Church and its continuance into modern times is a further expression of this continuity. 'As a religious institution, the church provided the post-bellum Negro of Cumberland Island with the solace he so much needed to relieve him of the burden of poverty and suffering. The church also was the focal point of the community serving not only the religious, but also the educational needs of the blacks who settled at Half Moon Bluff."

Impacts of Vibration on Historic Properties

The vibration impact from construction or operation of the project substantially impairs the use of a Section 4 (f) property. The reports note that the MCLV landings would not affect hearing conservation or cause structural damage, assuming the structures of these locations are well-maintained. In total, the park is responsible for 82 individual historic structures and 47 known archeological sites. There are 5 historic districts and 2 archaeological districts listed on the National Register of Historic Places at CUIS. High Point-Half Moon Bluff is located on the

northern portion of the island and overlaps with Cumberland Island's wilderness. Plum Orchard Historic District is adjacent to Cumberland Island Wilderness at the island's mid-point on the western shoreline. Structures in Cumberland's historic districts are fragile at best and should not be considered well maintained. Cumberland Island National Seashore has over \$7,237,260 in Deferred Maintenance needs which includes maintenance for historic properties.

Visual Impairment

Constructive use occurs when the proposed project substantially impairs esthetic feature or attributes of a property protected by Section 4(f) where such features or attributes are considered important contributing elements to the value of the property. Substantial impairment refers to obstruction or impairment of view, or substantially detracting from the setting of the 4(f) property which derives its value in substantial part due to its setting. Plum Orchard, Brickhill Bluff Campground, parts of the Main Road, the Cumberland Wharf Ruins and the western marshlands will be visually and audibly impacted by Spaceport Camden.

Motorized Use in the Wilderness

Motorized use in at the National Seashore is established through existing rights of access through the creation of retained rights agreements. Congress stated with clarity that additional motorized traffic should be avoided. Executive Summary Page 11 line 42 refers to 'Beach sweeps along the Atlantic coast beaches of Cumberland Island and Little Cumberland Island (limited to areas within the closure area) using ground vehicles suitable for beach travel (e.g. all-terrain or sport utility vehicles) and approved for use on Cumberland Island and Little Cumberland Island. What authority does Camden County, or a Site Operator have to grant the authority to allow these vehicles on Cumberland's beach? Beach Driving is restricted at Cumberland Island from May 1-Oct 31 from sun down to sun up. Unmanned Aerial Surveillance is referenced in Line 37. Drones are not allowed in national parks.

FAA Approved Hazard Area, Health and Safety

According to Appendix B of the DEIS, FAA assesses the health and safety impacts of launch site and launch through a separate review process. FAA conducts a safety review (14 Code of Federal Regulations [CFR] Part 420) independent of this EIS to determine whether proposed

operations can be conducted safely. Additionally, should the launch site be licensed, for each launch from the launch site, FAA would conduct a safety review (14 CFR Part 415). Because the licensee is responsible for public safety, it is important that the applicant demonstrate an understanding of the hazards involved, discuss how all operations would be performed safely, and assess the risks to public health and safety. Among the requirements in the event of a launch accident, the launch operator would be required by FAA regulations (14 CFR §417.415 part (c)) to establish procedural controls for hazards associated with a launch failure that results in a water or land impact beyond the boundary of the launch site. These procedural controls must address: evacuation of members of the public, extinguishing fires, securing impact areas, and ensuring public safety from hazardous debris.

According to the DEIS, public health and safety impacts more typically result from accidents as the public is not located onsite and, therefore, not exposed to operational hazards associated with normal operations.

The Commercial Space Launch Act of 1984, as amended and re-codified at 51 United States Code (U.S.C.) §50901–50923 directs FAA to carry out its responsibility to oversee and regulate commercial launches in a manner consistent with the public health and safety, safety of property, and the national security and foreign policy interests of the United States.

Fires are not allowed in back country wilderness campgrounds on CUIS, for a reason. Cumberland Island does not have a fire department and controlled burns require staffing from national parks, wildlife refuges and forests across the region. While NPS has conducted controlled burns in the wilderness, for many years the suppression of wildland fires significantly interfered with the natural fire regime that would be a part of the island and wilderness ecological processes. Fire suppression activities have inhibited and/or altered the evolution of natural habitats and allowed the accumulation of heavy vegetative fuel loads, which could result in extreme fire conditions and stand-replacing fires.

Cumberland Island and Little Cumberland Island are part of the hazard zone for proposed launches and landings at Spaceport Camden. Propellant to launch rockets is highly flammable. There is a high probability a launch at Spaceport Camden will result in rocket debris, surviving components, and fuel landing within the hazard area, on land-specifically Cumberland Island. How will the FAA insure that such incidents do not cause impairment of protected resources within the national seashore, in violation of federal law? What is the plan to control fire and

clean up fuel contamination? Who bears that cost? What about loss of life? The State of Georgia passed legislation sponsored by Rep. Jason Spencer to limit its liability to passengers who want to take a commercial rocket into space. Closer to earth who bears the responsibility if wildfire resulting from debris or fuel traps park staff, visitors or homeowners?

According to the CUIS Fire Management Plan (FMP), 'The Georgia Forestry Commission (GFC) and Camden County Fire and Rescue share fire protection responsibilities on Little Cumberland and CUIS serves as a cooperating agency as needed in the event of fire. The private tracts on both islands contain residences and other structures and are within the wildland-urban interface.... The north end of the island has seen numerous large fires throughout history. This is likely due to the vegetation type in conjunction with soil types. Fire occurrence is also tied to drought and rainfall amounts for the coastal island. Storms in the summer produce lightning which can ignite fires in dry vegetation. Some vegetation is more susceptible to sustaining fire than others. For instance, pine stands with grass and needle understory are more likely to carry fire than a live oak hammock with leaf litter. Fire on Cumberland Island has proven difficult to suppress, especially on the north end of the island. Access to large parts of the park is limited for equipment and personnel. Vegetation is very thick and fuel loadings in most fuel types are very high. These plus the lack of good safety zones and available suppression resources, increase the difficulty of suppressing fires on the island.

The FMP states, "While smoke on roads within the seashore boundary is a concern, smoke impacts to the Intracoastal Waterway are a major concern. Fire managers will work with the U.S. Coast Guard station in Brunswick, Georgia to inform them of potential impacts to the waterway. Consideration of impacts on the waterway will be identified in fire management actions."

The FMP also states, "Response times vary for each incident at CUIS. The Park has limited personnel that are fire fighter qualified and a variety of logistical issues can delay response. Typical first response will be by the FMO, red-carded park employees, or park law enforcement employees. The GFC or Camden County Fire and Rescue may respond to or assist seashore firefighters in the suppression of wildland fires at CUIS. Fire response time at the seashore can vary greatly, primarily due to the location of the Park and lack of road access from the mainland. If additional resources from the mainland are needed it can take in excess of two hours to get individuals and equipment to the island. The Park has one landing craft that is

suitable to move limited equipment from the mainland to the island but, is restricted to offloading on the island at mid to high tide. Boat transportation for personnel and equipment will almost always be necessary for any incident. If seashore firefighters are not immediately available, the GFC, Camden County Fire and Rescue, U.S.F.S., or U.S.F.W.S. can respond under authority of MOU's and AOP's but response time is between two and four hours according to their location, tide tables, and availability of boat operators. Okefenokee National Wildlife Refuge has a Type-3 helicopter stationed at the refuge during fire season. Typical response time for the helicopter when available is 45 minutes." Given these slow response times, how can FAA insure that residences and protected resources on CUIS are not damaged and impaired in violation of federal law?

CUIS Resource Management Plan (RMP) states that the National Park Service and the Georgia Forestry Commission agreed to divide the responsibility for fire control on Cumberland Island. The Georgia Forestry Commission was given the responsibility of protecting privately owned lands on both islands, whereas protection of United States Government lands on Cumberland Island was placed under the jurisdiction of the National Park Service on Cumberland Island. CUIS collaborates on fire management activities with its interagency partners, state and local cooperators, and members of the public. Interagency partners include Okefenokee National Wildlife Refuge, Timucuan Ecological & Historic Preserve (TIMU), and Osceola National Forest. Collaboration also occurs with Camden County Fire and Rescue, Saint Mary's Fire Department, and Georgia Forestry Commission (GFC). Outreach and coordination with the public including reserved estate holders, private landowners, island residents, and other interested public figures occurs through public meetings, mailings, and informal contact. CUIS is a partner in the Tri-Agency Agreement which includes the National Park Service (CUIS and TIMU), the U.S. Fish and Wildlife Service (Okefenokee NWR), and the U.S. Forest Service (Osceola 35 NF). The Tri-Agency Agreement provides mutual assistance to each agency for all fire management needs. CUIS is also a member of the Southeast Georgia - Northeast Florida Fire Planning Unit (FPU) under the interagency fire program analysis (FPA). Other members of the FPU include Okefenokee NWR, Banks Lakes NWR, TIMU, Fort Frederica National Monument (FOFR), Fort Caroline National Monument (FOCA), and Osceola National Forest. Will these entities be reimbursed by the Launch Site Operator if launch operations cause a fire to break out on Cumberland Island?

Cumberland Island National Seashore as part of the larger landscape

Cumberland Island has the largest and most diverse system of wetlands on any of Georgia's barrier islands (Hillestad and others, 1975). In addition to more than 16,500 acres of salt marshes, mud flats, and tidal creeks, there are more than 2,500 acres of freshwater wetlands that range from permanent and semi-permanent ponds to seasonal wetland areas including emergent, scrub/shrub, and forested palustrine areas. Cumberland Island National Seashore marsh at the western boundary of the park serves as essential habitat for fish to spawn, feed and grow to maturity. It is also essential habitat for egrets, clapper rails, oystercatchers, wood storks and bald eagles. This marsh is not a buffer zone for a spaceport. It is an essential part of the Georgia marsh system which accounts for about 1/3 of the marsh on the Eastern Seaboard. Nearly 95 percent of the fish and shell fish that live off the Georgia Coast reside in the marshes and tidal creeks at some time in their lives. Shrimp, red drum, and snapper are all commercial species harvested off the coast of Georgia. Manatees and dolphins frequent the tidal creeks as well. Georgia's Coastal Marshland Protection Act was enacted to help protect this remarkable diversity. It should also be noted that Cumberland Island is a United Nations International Biosphere Reserve and a designated Important Bird Area by The Audubon Society which specifically references the importance of the wilderness area on Cumberland Island in protecting threatened and endangered species, including six species of migratory and shore birds and four species of sea turtles. It is clearly a place of global significance.

The DEIS makes light of the impact of the proposed spaceport on wildlife. It should be noted that migratory birds travel thousands of miles and CUIS is an important stop over. Birds will exhibit a startle response to rocket launches, tests and landings. Startle responses likely disturb foraging and feeding behavior, crucial for these birds. Birdlife International reports that 40% of the world's 11,000 bird species are in decline.

Audubon notes that "Cumberland Island is a major stopping point on the transatlantic migratory flyway, with over 335 species of birds recorded. Threatened and endangered species include Least Tern, Wilson's Plover, and American Oystercatcher. The southernmost point of the island, known as Pelican Banks, is a favorite place for Black Skimmers, oystercatchers, pelicans, and numerous ducks and shore birds. The fresh water ponds provide excellent rookeries for Wood storks, white ibis, herons and egrets. In the forest canopy, warblers, buntings, wrens and woodpeckers abound. On the shores, osprey, peregrine falcons, and the occasional Bald Eagle and Golden Eagle can be seen. Cumberland is a breeding site for

endangered/threatened/high priority species such as Wood Stork, GAEA, Least Tern, Painted Bunting.”

The DEIS is deficient in meeting NEPA requirements in several ways. It fails to take a realistic look at the impacts of vibration from rocket launches, landings and testing on the marsh structure, water quality and sensitive species. It also fails to look at the impact of disturbance of the launch site in relationship to existing and future contaminants.

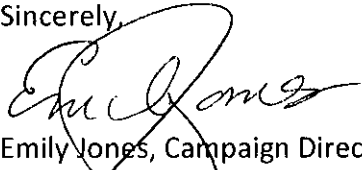
It provides no impacts related to potentially dredging Floyds Creek, and the impact on fish and wildlife from that dredging. It is insufficient in the discussion of the current condition and potential need for construction of a dock on that creek and fails to analyze environmental impacts if a new dock must be built. The county must fully describe the environmental impacts to Floyd Creek to comply with NEPA.

The CEQ regulations for implementing NEPA require assessment of cumulative effects in the decision-making process for Federal projects. Cumulative effects are defined as "the impact on the environment which results from the incremental impact of the action when added to otherpast, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (40 CFR 1508.7). NEPA also requires an agency "to exercise a degree of skepticism in dealing with self-serving statements from a prime beneficiary of the project and to look at the general goal of the project rather than only those alternatives by which a particular applicant can reach its own specific goals.....Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.

NPCA respectfully request that FAA take a very hard look at this project, and choose the no action alternative, given the lack of information, failure to address mitigation, and significance of federal and state protections of the natural, cultural and historic resources this spaceport and launch activities will impact. NPCA members from across the United States have submitted more 10,000 comments requesting that FAA not move forward with the preferred alternative in preparing the Environmental Impact Statement for a Launch Site Operator License for Camden County, Georgia. These national park advocates ask that FAA choose the no action alternative as outlined in this Draft EIS and discontinue this process. Camden County shows no real evidence that this project will fulfill their needs, nor does FAA.

NPCA is fully invested and is participating in the comments submitted by Southern Environmental Law Center (SELC) on this DEIS. We find the NEPA investigation and analysis woefully inadequate.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Jones". The signature is fluid and cursive, with a large loop at the end.

Emily Jones, Campaign Director

National Parks Conservation Association