



## WILDERNESS WATCH

*Keeping Wilderness Wild*

June 14, 2018

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### Minneapolis, MN Office

2833 43rd Avenue South

Minneapolis, MN 55406

(P) 612.201.9266

### Moscow, ID Office

P.O. Box 9623

Moscow, ID 83843

(P) 208.310.7003

Ms. Stacey M. Zee, Environmental Specialist  
Federal Aviation Administration  
c/o Leidos  
2109 Air Park Road SE, Suite 200  
Albuquerque, NM 87106

Sent via: [FAACamdenSpaceportEIS@Leidos.com](mailto:FAACamdenSpaceportEIS@Leidos.com)

Re: Spaceport Camden DEIS

Dear Ms. Zee,

The following comments on the Draft Environmental Impact Statement (DEIS) for the Spaceport Camden project come from Wilderness Watch. Wilderness Watch is a national wilderness conservation organization focused on the protection and proper stewardship of all the units of the National Wilderness Preservation System, a significant one of which is the Cumberland Island Wilderness. Our comments will focus primarily on the Cumberland Island Wilderness.

The Cumberland Island Wilderness is part of the Cumberland Island National Seashore, administered by the National Park Service (NPS). Though a part of the National Seashore, the Cumberland Island Wilderness has additional protections given it by Congress that the rest of the National Seashore does not enjoy, primarily protections from the 1964 Wilderness Act, 16 U.S.C. 1131-1136. This additional layer of protection also requires additional environmental review, review that has not yet been adequately conducted.

Our specific comments follow:

### **1. The Spaceport Camden proposal threatens the Cumberland Island Wilderness in many ways.**

As we understand the proposed project, the National Park Service would have to close the Wilderness and maybe the entire Cumberland Island National Seashore, which gets up to 300 visitors per day (the maximum limit). Since Cumberland Island is a unique World Heritage

Site and people travel there from all over the world, planning their trips far in advance, this would be a major inconvenience.

The launches, which are proposed to initially start with one launch per month and could increase over time, would track over the north end of the island, which is where the Wilderness is located, and also over Little Cumberland Island, which has about 40 homes on it, and is separated from Cumberland Island only by a narrow stretch of marsh. Nowhere in the U.S. are rockets launched over inhabited areas.

The noise and visual intrusion from these commercial rocket launches will also negatively impact the Cumberland Island Wilderness. No other unit of the National Wilderness Preservation System has commercial rockets launching over it at so close a distance.

There is also the obvious danger of failed launches with debris falling in flames from the sky. There is also the danger of flaming debris falling into the Wilderness and causing fires.

## **2. The DEIS inadequately analyzes impacts of the project on the Cumberland Island Wilderness.**

**a. The DEIS barely mentions the existence of the Cumberland Island Wilderness.** The DEIS barely mentions the existence of the Cumberland Island Wilderness; see, for example, pages 2-43 to 2-44, pages 3-62 to 3-63, and pages 3-67 to 3-69. But nowhere in the DEIS does the document adequately analyze the wilderness character of the Cumberland Island Wilderness and the threats to its wilderness character from the proposed project.

The federal agencies that administer Wilderness have developed an inadequate set of four or five tangible, measurable qualities of wilderness character called Keeping It Wild<sup>2</sup>. That framework knowingly ignores all of the vast intangible aspects of wilderness character and focuses on just a few contrived aspects that can be measured and counted. The Keeping It Wild<sup>2</sup> framework is wholly inadequate. Instead, the proposed project threatens at least the following aspects of wilderness character of the Cumberland Island Wilderness:

- a. Wildness
- b. Solitude
- c. Remoteness
- d. Noise
- e. Visual intrusion
- f. Primitive and unconfined recreation
- g. Undeveloped nature
- h. Transcendent and spiritual values
- i. Connection to the past
- j. Ecological and evolutionary processes
- k. Other intangible values

The Final EIS, if this project moves forward, must fully analyze the impacts of the proposed

project on all of these aspects of wilderness character for the Cumberland Island Wilderness.

**b. The Cumberland Island Wilderness is governed by the 1964 Wilderness Act, 16 U.S.C. 1131-1136.** Congress designated the Cumberland Island Wilderness in 1982 under the provisions of the 1964 Wilderness Act.

The overriding purpose of the Wilderness Act is the preservation of wilderness character. Section 2(c) of the Wilderness Act defines “Wilderness” as:

A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

Congress was clear through the Section 2(a) “Statement of Policy” that Wilderness areas “shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character...” Pursuant to Section 4(b), “each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such areas for such other purposes for which it may have been established as also to preserve its wilderness character.”

This is why Howard Zahniser’s foresight is so important. Howard Zahniser, the drafter of the Wilderness Act, focused primarily on wildness as the essential quality of wilderness: “We must remember always that the essential quality of the wilderness is its wildness.” (Howard Zahniser, “New York’s Forest Preserve and Our American Program for Wilderness Preservation,” Statement to the New York State Legislature, 1953.) In the Wilderness Act, Zahniser chose the word “untrammelled” to best describe the character of wilderness in the Wilderness Act. He stated that “[a] wilderness is an area where the earth and its community of life are untrammelled by man. (Untrammelled – not untrampled – untrammelled, meaning free, unbound, unhampered, unchecked, having the freedom of the wilderness.)” (Senate Comm. on Interior and Insular Affairs, *Hearings before the Committee on S. 1176*, 85<sup>th</sup> Congress, 1<sup>st</sup> sess., June 19-20, 1957, pp. 212-13.)

Likewise, the National Park Service’s wilderness management direction describes

“untrammeled” as: “Wilderness is essentially unhindered and free from the intentional actions of modern human control or manipulation.”

The National Park Service summarizes wilderness character in this way:

Wilderness character is a holistic concept based on the interaction of (1) **biophysical environments** primarily free from modern human manipulation and impact, (2) **personal experiences** in natural environments relatively free from the encumbrances and signs of modern society, and (3) **symbolic meanings** of humility, restraint, and interdependence that inspire human connection with nature. Because personal experiences and symbolic meanings are intangible and may differ from person-to-person, further defining these components of wilderness character has not occurred.

(NPS, Wilderness Stewardship Division, at <https://www.nps.gov/orgs/1981/wilderness-character.htm>)

The launching of commercial rockets over the Cumberland Island Wilderness will certainly negatively impact the area’s wildness and wilderness character, in violation of the requirements of the Wilderness Act and the NPS’s guidelines.

If this ill-considered Spaceport Camden proposal moves forward, the Final EIS must thoroughly analyze all of the impacts on all of the aspects of the wilderness character of the Cumberland Island Wilderness.

**3. The FAA should reject the Spaceport Camden proposal, and the project should be withdrawn from consideration.**

Because this proposal will have such devastating impacts on the Cumberland Island National Seashore and the Cumberland Island Wilderness, the FAA should reject the Spaceport Camden proposal and withdraw it from further consideration.

Please keep Wilderness Watch on your contact list for any further developments on this proposal.

Sincerely,



Kevin Proescholdt  
Conservation Director