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July 9, 2021

Via Electronic Mail

Shannon A. Estenoz

Principal Deputy Assistant Secretary for Fish and Wildlife and Parks

U.S. Department of the Interior,

1849 C Street NW, Washington, DC 20240.

Shannon_estenoz@ios.doi.gov

RE: Spaceport Camden and Cumberland Island National Seashore

Dear Deputy Assistant Secretary Estenoz:

We write to raise concerns about Spaceport Camden, a proposed rocket launch site that would be located immediately inland from Cumberland Island National Seashore and Wilderness Area. The planned spaceport would launch rockets across the island and require a “limited access area” across the park. (See attached at Figure 1). The Federal Aviation Administration (“FAA”) is finalizing its review of the project’s launch site license application and recently released the project’s Final Environmental Impact Statement (“FEIS”).¹

The National Park Service and the Department of the Interior Region 2 (collectively, “the DOI”) have raised serious concerns about Spaceport Camden since the project’s inception. The FAA’s decision to release the FEIS despite these concerns and the DOI’s repeated requests for basic information regarding the project’s potential impacts have brought this matter to a head. Shortly after the FAA released the FEIS, the DOI once again requested information regarding the risk of failed rocket launches and the spaceport’s potential impact on park operations.² This information is essential to properly evaluate the adverse impacts of the project, and the DOI has previously requested this information on multiple occasions.

The DOI’s concerns are well-founded. The FAA has advised the applicant that a failed launch from Spaceport Camden could trigger an “uncontrollable fire” on Cumberland Island.³

¹ June 25, 2021 EPA Notice of Availability: Final EIS No. 20210082, Spaceport Camden, www.federalregister.gov/documents/2021/06/25/2021-13558/environmental-impact-statements-notice-of-availability.

² June 24, 2021 Letter from G. Ingram to D. Murray re Comments on Section 106 Programmatic Agreement.

³ Dec. 16, 2019 Letter from K. Wong (FAA) to J. Starline (Camden County).

And Spaceport Camden’s license application describes the use of “temporary controls on public access” on Cumberland Island during launch activities.⁴ Without more information on these and other potential impacts, it is impossible for the DOI to properly evaluate the risk that Spaceport Camden poses to Cumberland Island National Seashore as required under the National Environmental Policy Act, Section 106 of the National Historic Preservation Act, and Section 4(f) of the Department of Transportation Act.

In the context of the Section 106 review, the DOI and the other consulting parties continue to raise objections which remain unresolved even after the release of the FEIS. For example, the Gullah/Geechee Sea Island Coalition has raised concerns about the adverse impacts of the project on significant resources within the Gullah/Geechee Cultural Heritage Corridor. Many Gullah/Geechee people live within or near the project area, and cultural resources such as the First African Baptist Church on Cumberland Island would also be at risk.

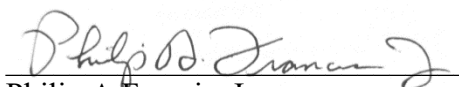
The DOI must take all steps necessary to ensure that the risks of Spaceport Camden are fully evaluated and all mitigation measures are employed to protect Cumberland Island National Seashore. These measures include identifying and clearly documenting the FAA’s numerous failures and omissions in its review of this project. Further, the DOI should lodge formal objections to the FAA’s review as authorized by Section 4(f) and Section 106. And, given Cumberland Island National Seashore’s national importance and the dangerous precedent that the FAA’s mishandled review could set, the DOI should consider a predecisional referral of this matter to the Council on Environmental Quality under 40 C.F.R. § 1504.1 *et seq.*

Thank you for your attention to this matter and all of the efforts by DOI staff to protect Cumberland Island National Seashore. We are happy to provide any additional materials or discuss this matter further if it would be helpful.

Sincerely,



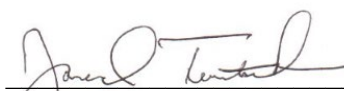
David Kyler
Executive Director
Center for a Sustainable Coast



Philip A Francis, Jr.
Chair
Coalition to Protect America’s Parks



Charles H. McMillan, III
Coastal Director
Georgia Conservancy



Jared Teutsch
Executive Director
Georgia Audubon

⁴ Revised Launch Site Operator License Application: Population Monitoring and Management Plan (Jan. 14, 2020) at 6.

Queen Quet

Queen Quet
Chieftess of the Gullah/Geechee Nation
Gullah/Geechee Sea Island Coalition

Megan Desrosiers

Megan Desrosiers
President and Chief Executive Officer
One Hundred Miles

Emily Jones

Emily Jones
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Wild Cumberland

Kevin Proescholdt

Kevin Proescholdt
Conservation Director
Wilderness Watch

Enclosure

CC (via electronic mail):

Mr. Pedro Ramos	(DOI Region 2 Director)
Mr. Lance Hatten	(DOI Region 2)
Mr. Ben West	(DOI Region 2)
Ms. Joyce Stanley	(DOI Region 2)
Ms. Simone Monteleone	(DOI Region 2)
Mr. Mark Kinzer	(DOI Regional)
Mr. Gary Ingram	(Cumberland Island National Seashore Superintendent)
Mr. Roger Semler	(DOI Chief of Wilderness Stewardship Division)
Senator Jon Ossof	
Senator Raphael Warnock	

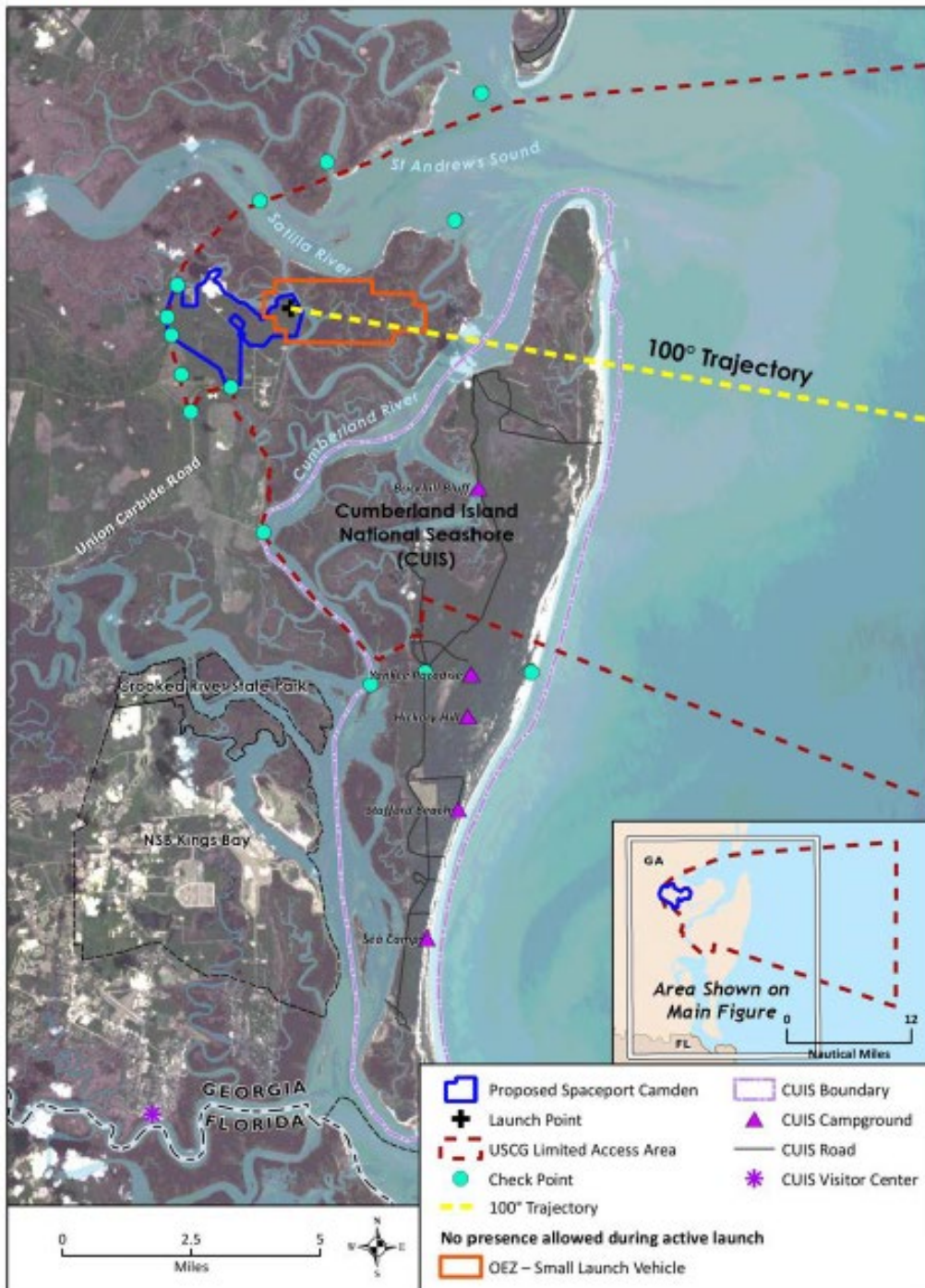


Exhibit 2.1-10. Overflight Exclusion Zone and Composite Launch USCG Limited Access Areas (100-degree Trajectory)

Figure 1: Proposed Spaceport Camden in Relation to Cumberland Island National Seashore and Wilderness Area