



DEPARTMENT OF THE NAVY

COMMANDER NAVY REGION SOUTHEAST
BOX 102, NAVAL AIR STATION
JACKSONVILLE, FLORIDA 32212-0102

5090
Ser N00/391
14 Jun 18

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

Dear Ms. Zee:

SUBJECT: COMMENTS ON THE FEDERAL AVIATION ADMINISTRATION DRAFT
ENVIRONMENTAL IMPACT STATEMENT FOR SPACEPORT CAMDEN,
CAMDEN COUNTY, GEORGIA

As the Navy's Region Environmental Coordinator for Environmental Protection Agency Region Four, I have reviewed the Federal Aviation Administration's (FAA) draft environmental impact statement (DEIS) for the proposed Spaceport Camden. This review includes consolidated comments from Navy Region Southeast (NRSE), Fleet Area Control and Surveillance Facility Jacksonville (FACSFAC JAX), Naval Submarine Base (SUBASE) Kings Bay, Georgia, and supported operational commands that may be impacted by this proposed action.

Respectfully request the FAA consider comments listed below prior to completing the final environmental impact statement (FEIS). The primary areas of concern are with respect to Navy training and operations conducted on or in the vicinity of SUBASE Kings Bay. Specifically:

- DEIS does not address potential impacts to military training and vessel movements within the Military Operating Areas and Warning Areas at sea. Air and sea space has daily military use and any closure due to Spaceport launches could impact or degrade important training and operational requirements. Navy requests the typical quantity and duration of air and sea space proposed to be impacted during a launch and / or landing event.
- FEIS and associated FAA studies need to incorporate an air and sea space (to include submarine movements) planning and priority system. Currently FACSFAC JAX is required to operate and schedule in accordance with U.S. Fleet Forces Operations Order 2000. This directive does not provide the ability to schedule exclusive airspace to a commercial entity unless that entity is in support of the Department of Defense.

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- DEIS does not address risk concerns or probabilities related to failed vehicle launch and landings. This is of particular concern for first stage recovery actions that are proposed for on-shore landings. What is the probability a failed launch or landing will occur outside of the DEIS closure boundary? Recommend an Operational Risk Management plan be developed similarly to what is used at Canaveral Air Force Station and Kennedy Space Center.
- The Navy requests a pre-launch notification and procedure plan be developed and agreed upon for Spaceport actions, to include static test events. Plans should include appropriate advanced notices, safety, and security procedures.
- The Navy is concerned with the use of unmanned aerial systems (UAS) for pre-launch activities. From a Navy security standpoint, SUBASE Kings Bay needs to be engaged in the planning for UAS use in the vicinity of the installation.
- The Navy recommends the FEIS include analysis with respect to potential hypergolic fuel vapor plums during a vehicle incident or from storage facilities located at the Spaceport.

We understand the importance of developing the commercial space program and we look forward to continuing to work with the FAA and Camden County during the EIS process. The point of contact for this matter is Mr. W. Brock Durig, who may be reached at (904) 542-6966 or via email: william.durig@navy.mil.

Sincerely,



B. BOLIVAR

Copy to:
USFF (N46)
CNIC (N4)
COMSUBGROUP 10 (N3)
SUBASE Kings Bay (N00/N4)
FACSFAC JAX