



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

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Docket No. FAA-2026-9736

James Hatt
Federal Aviation Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE, Washington, DC 20590

RE: Comments on the Request for Information, "Siting New Spaceports and Use of Priority Airspace for Critical Space Launch Corridors," 91 FR 54909 (Aug. 25, 2026); Docket No. FAA-2026-9736

Dear Mr. Hatt:

The Louisiana Wildlife Federation (LWF) appreciates the opportunity to comment on the Department of Transportation (Department) and Federal Aviation Administration (FAA)'s request for information (RFI) on the siting of new commercial spaceports and the development of priority airspace for critical space launch corridors. Established in 1940, LWF is a statewide nonprofit organization representing more than 10,000 members and 23 affiliate organizations of hunters, anglers, birders, and outdoor enthusiasts dedicated to the conservation of Louisiana's wildlife and natural resources.

LWF supports a strong American space program and does not oppose expansion of the commercial launch industry. Our interest in this proceeding is narrower. As the Department develops criteria for locating new spaceports and their launch corridors, we urge it to weigh environmental durability, wildlife and habitat conflicts, existing aviation and maritime uses, public access, and coastal hazards before a location is selected and substantial public and private investment is committed.

That need grows sharper as launch cadence rises. Louisiana Department of Economic Development has announced that the proposed Vermilion Parish facility is intended to support thousands of launches a year, and SpaceX has publicly described a future in which spaceports operate more like airports, with multiple launches a day. A framework built for that level of activity has to ask not simply whether a single launch can occur safely, but whether the surrounding airspace, waters, infrastructure, communities, and natural resources can absorb repeated launch operations over decades. We respond primarily to Questions 1, 4, 5, and 6 in your request for information.

I. Question 1 — A Viable Spaceport Has to Be Durable, Not Just Well-Positioned for Launch

Question 1 asks what strategic criteria should guide the selection of new spaceport locations. The RFI points to open water launch geography, infrastructure, population separation, and public safety. We recommend adding a threshold question of equal weight: can the site, and the aviation, maritime, and natural-resource systems around it, support high-cadence operations over the expected life of the facility? A spaceport is fixed, high-value infrastructure meant to run for decades, so siting should account for the conditions that create predictable long-term cost, operational constraint, public-access conflict, or environmental harm. At minimum, those criteria should include the following.

Coastal land loss and shoreline stability

A site undergoing substantial subsidence, wetland loss, or shoreline retreat carries very different long-term risk than stable upland. On the Louisiana coast, canal dredging and the saltwater intrusion that follows have been among the leading drivers of wetland loss, and a site that depends on extensive new or deepened access channels can accelerate that loss. Permanent launch infrastructure built into an actively changing coastal landscape may demand rising expenditures for protection and maintenance across the life of the facility. Those rising costs may not fall on the operator alone. Communities, local governments, landowners, and the State may be called on to protect public infrastructure and to restore damaged resources, or wetland loss worsened, by spaceport construction and operations.

Hurricane and storm-surge exposure

The frequency and severity of tropical storms belong in the initial site screen. Major storms threaten not only launch infrastructure but the surrounding wetlands and waters, should propellants, industrial materials, or damaged infrastructure be released.

Adjacent public and natural resources

Proximity to national wildlife refuges, state wildlife areas, important wetlands, listed-species habitat, and major migratory-bird concentrations should weigh heavily in the analysis. These resources need not automatically rule out a site, but they raise the potential for long-term conflict and deserve real consideration before a location becomes the preferred alternative.

Existing aviation activity

The Department should also examine whether a proposed launch corridor conflicts with established aviation use, and this matters acutely along the Louisiana coast. The FAA itself describes Gulf airspace as carrying a tremendous amount of helicopter traffic serving offshore oil and gas platforms, and since ADS-B surveillance was deployed in the Gulf, monthly IFR helicopter activity has tripled. That traffic moves continuously between coastal bases and hundreds of offshore facilities, often at low altitude and through the same airspace that may be attractive for launch corridors. It should not be treated as an afterthought once a site is chosen. Before designating a preferred spaceport or corridor, the FAA should model existing offshore helicopter routes and traffic density; conflicts between those routes and proposed Aircraft Hazard Areas; likely rerouting during launch activity; effects on emergency and medevac flights serving offshore workers; the cumulative delay and cost of repeated closures; and whether a different

launch azimuth or a different site could avoid the conflict altogether. At a site running occasional launches these effects may be manageable. At a site designed for multiple launches a day, they are a basic siting question.

Existing offshore energy infrastructure

The same analysis applies to fixed offshore energy infrastructure. The western Louisiana Gulf holds oil and gas platforms, pipelines, support vessels, and proposed LNG facilities. The Delfin LNG deepwater-port project, for instance, is proposed roughly 37 to 41 nautical miles off Cameron Parish. We do not assert that Delfin or any specific facility lies within a future Vermilion Parish launch trajectory, because the launch azimuths and hazard-area boundaries have not been publicly established, and that uncertainty is precisely why the siting framework should require the analysis up front. Candidate corridors should be mapped against existing and reasonably foreseeable offshore infrastructure before a site is selected, including platforms and heliports, LNG facilities and deepwater ports, pipelines, established vessel routes, offshore workforce transportation, and the safety and security areas around offshore installations. A site that can launch safely but requires recurring displacement of established aviation or maritime activity may still be a poor choice from a broader infrastructure standpoint.

Low-probability, high-consequence hydrologic risk

The framework should also weigh major regional hydrologic change, unlikely in any single year, but capable of affecting the long-term viability of permanent infrastructure. Louisiana offers an unusual example in the Old River Control Complex, which exists for one reason: the US Army Corps of Engineers (Corps) itself concluded, as early as 1953, that the Mississippi River would change course into the shorter, steeper Atchafalaya, a path roughly half the distance and twice the gradient to the Gulf, if it were not actively controlled. The entire complex is engineered to prevent that avulsion and to hold the congressionally mandated split of the combined Mississippi and Red River flow at 70 percent down the Mississippi and 30 percent down the Atchafalaya.

The Corps does not treat failure as imminent, and neither do we. But the Corps' own record shows it treats the threat as real and the margin as narrower than it once was. During the 1973 flood, scour seriously undermined the Low Sill Structure and the Corps came close to losing it; afterward, the Corps permanently derated the structure, determining that the safe head differential between the two rivers should be no more than 22 feet, down from the 37 feet it was originally designed to withstand. The Corps built the Auxiliary Structure, completed in 1986, specifically to relieve the Low Sill after that near-miss. More recently, the Corps moved to dewater and inspect the Low Sill for the first time since 1987, a multimillion-dollar effort. The New Orleans District calls the complex 'critical to both the region and the nation.' This is the Corps characterizing the risk through its own actions, and it describes a structure that is controlled but not casually secure.

The worst case, though rare, is severe, and it is worth stating because it defines the stakes for any permanent infrastructure sited in this landscape. Were the control complex to fail during an extreme flood and the Mississippi to capture the Atchafalaya, the Corps' own history of the problem indicates the consequences would be regional and lasting: a dramatic increase in flow down the Atchafalaya through south-central Louisiana, with corresponding loss of flow past Baton Rouge and New Orleans, and sweeping changes to flooding, sediment delivery, salinity, and navigation across the basin. For a spaceport, the relevant point is not the probability in any

given year but the exposure over the life of the facility. A launch complex in south-central coastal Louisiana would sit within the landscape most directly reshaped by such an event, changes in water levels, salinity regime, sediment, and coastal morphology that could alter the site's hydrology, access, and viability well beyond anything a launch operator could design around.

We raise this not to predict catastrophe but to make a straightforward siting point. The Corps considers this hazard serious enough to have spent decades and considerable public money guarding against it, and to be investing again now. Infrastructure intended to operate for generations in south-central coastal Louisiana should be evaluated against the same hazard the Corps itself takes seriously, and the Department should ask how a substantial future shift in Mississippi-Atchafalaya flow, whether gradual or sudden, would affect regional flooding, sediment, salinity, navigation, coastal morphology, and the site itself. The question is not whether such an event is expected tomorrow, but whether a site meant to last generations has been measured against the major regional hazards that could affect it over that span.

Competing demand for dredging capacity and sediment

Coastal spaceport construction requires extensive channel dredging, and fill can compete with Louisiana's coastal restoration, hurricane protection, and navigation maintenance programs for a limited supply of dredging equipment and suitable sediment. That competition can raise costs and delay critical public projects, and material dredging from industrial access channels is not always suitable for beneficial use. Siting criteria should account for these demands on shared public resources.

II. Question 4 — Environmental Review and Public Engagement Are Worth Most Before a Site Is Chosen

Question 4 asks how the Department can handle stakeholder engagement, environmental issues, and airspace integration in developing a new spaceport. Our answer is straightforward: deal with them while location is still a variable. The best chance to avoid environmental and operational conflict is a good siting decision, and once property is acquired, infrastructure designed, and a site publicly committed, the available choices narrow sharply. That holds equally for wildlife habitat, aviation, fisheries, navigation, and public access.

State fish and wildlife agencies, coastal-management authorities, FAA air-traffic specialists, the Coast Guard, offshore energy operators, commercial and recreational fishing interests, local governments, universities, conservation organizations, and affected communities should all take part during site screening, not after a preferred location has effectively been set. A meaningful process would identify, before final selection, the environmental resources that may constrain operations, the heavily used aviation routes, the offshore energy infrastructure, the commercial and recreational fishing grounds, the vessel traffic, the public hunting and fishing access, the likely launch-related airspace restrictions, the reasonably foreseeable Coast Guard navigation restrictions, and the anticipated launch cadence. Considering these things early is not just environmental review. It is sound infrastructure planning.

III. Question 5 — Launch Corridors Have Consequences in the Air and on the Water

Question 5 asks what environmental concerns should factor into where critical launch corridors are located and when they are used. We recommend the Department broaden the inquiry,

because a launch corridor does not exist only in FAA-controlled airspace. Its safety footprint reaches aircraft, vessels, fishermen, hunters, offshore workers, energy infrastructure, and wildlife beneath the trajectory.

Aviation conflicts

The FAA establishes Aircraft Hazard Areas to protect uninvolved aircraft from launch and reentry debris, and the critical-corridor concept is meant to support much higher cadence. For coastal Louisiana, those corridors have to be measured against an already crowded offshore aviation system, helicopter operations supporting oil and gas production, crew changes, inspection, medical transport, and emergency response. A corridor that requires repeated diversion or exclusion of that traffic could impose real operational cost even if each restriction is brief. The cumulative question is the one that matters: what happens when a temporary airspace restriction is activated several times in a single day, over and over throughout the year? At high enough cadence, a series of temporary restrictions starts to function like a permanent constraint on established aviation. The FAA should model that now, not after launch infrastructure is built.

Maritime safety zones and public waters

The same logic applies on the water. The FAA does not close waters to vessels; that authority rests with the U.S. Coast Guard. But maritime restrictions are a foreseeable consequence of coastal launch operations and belong in the siting analysis. The Coast Guard's experience at Boca Chica is instructive: it has established launch-related safety zones activated around launch operations, currently estimating enforcement for roughly four to eight hours on launch days. These are not continuously closed waters, but vessels may not enter an activated zone without authorization. The Coast Guard can also impose more enduring controls, Regulated Navigation Areas for recurring safety or environmental conditions, as distinct from safety zones that address defined periods of hazard. That distinction matters for Louisiana. A facility supporting thousands of launches a year raises a very different access question than one conducting a few, and even if each closure remains technically temporary, multiple launch windows a day could add up to frequent or prolonged periods when parts of public Gulf waters are off-limits.

Before selecting a location, the Department should determine the likely footprint of launch-related maritime safety zones; the expected duration of each closure; the anticipated closures per day, month, and year; whether recovery operations require additional restricted areas; how much state and federal water could be affected; whether restrictions overlap traditional commercial and recreational fishing grounds; the effect on charter operations and recreational boating; the effect on hunting access where coastal marsh or water routes fall within the footprint; conflicts with offshore supply vessels and energy infrastructure; and whether high cadence could lead the Coast Guard to impose more persistent controls. These are not secondary considerations. Louisiana's coastal waters are working public waters; they carry commercial shrimpers, crabbers, and fishermen, charter businesses, recreational anglers, hunters, offshore energy operations, and ordinary navigation. A national siting process should establish the access cost of a location before a launch corridor is placed over those uses.

Wildlife and habitat along the corridor

Corridor analysis should also address the resources beneath the flight path. Repeated noise, overpressure, lighting, debris risk, and disturbance should be evaluated where corridors cross or

adjoin national wildlife refuges, state wildlife areas, major waterfowl concentrations, whooping crane habitat, marine mammal and sea-turtle habitat, or important fisheries. Cadence matters here too: the effect of ten launches a year cannot simply be scaled up to a facility designed for thousands, and cumulative exposure should be evaluated against the actual anticipated operating model.

IV. Question 6 — The RFI Asks Where Spaceports Can Go, But Not Where They Should Not

Question 6 asks what the Department has failed to ask. The missing question, in our view, is this: what combination of environmental, operational, access, and infrastructure conflicts should make a location presumptively unsuitable for a major new spaceport? The RFI rightly asks what makes a site viable. A complete framework should also name the circumstances that weigh strongly against selection, severe and continuing coastal land loss; extreme hurricane and storm-surge exposure; extensive wetlands whose fragmentation would be hard to reverse; immediate proximity to national wildlife refuges or state conservation lands; listed-species habitat; nationally significant migratory-bird concentrations; conflicts with heavily used aviation corridors; launch trajectories crossing concentrations of offshore energy infrastructure; repeated restriction of productive fishing areas; significant loss of public hunting, fishing, and boating access; a cadence requiring frequent maritime or aviation closures; competition with public restoration, protection, and navigation projects for dredging capacity and suitable sediment; and major long-term hydrologic or geologic risk.

Coastal Vermilion Parish shows why this matters. The Pecan Island and Freshwater City area lies within the Chenier Plain, one of North America's most important wintering landscapes for migratory waterfowl. It is adjacent to the Rockefeller Wildlife Refuge and the White Lake Wetlands Conservation Area, the heart of Louisiana's whooping crane restoration. It holds extensive coastal wetlands, supports commercial and recreational fisheries, faces substantial hurricane and surge exposure, and sits on a coast that is physically changing. And the proposed facility is designed for a scale far beyond a conventional launch site. Louisiana Economic Development states that at full buildout, it could include five launch complexes with ten launch pads and support thousands of launches a year. That scale changes the analysis. The question is no longer whether a rocket can launch safely toward open water. It is whether that launch frequency can coexist over decades with a heavily traveled offshore helicopter network, commercial and recreational fishing, offshore energy production, fixed and proposed offshore facilities, public coastal access, major migratory-bird habitat, listed species, public wildlife areas, coastal restoration areas, and an exceptionally dynamic coastline. A location can satisfy launch-trajectory criteria and still be a poor national infrastructure choice once those cumulative conflicts are weighed.

V. Recommendations

For the reasons above, LWF respectfully recommends that the Department:

- 1. Build environmental and operational durability into national siting criteria,** including coastal land loss, subsidence, storm surge, long-term hydrologic change, competing demands on dredging capacity and sediment, and other conditions affecting a facility's useful life.

2. **Map proposed launch corridors against existing aviation activity**, including Gulf oil-and-gas helicopter routes, offshore heliports, agriculture aircraft, emergency aviation, and other established traffic.
3. **Map corridors against offshore infrastructure**, including oil and gas platforms, LNG facilities, pipelines, vessel routes, and related safety and security zones.
4. **Evaluate reasonably foreseeable Coast Guard restrictions at the siting stage**, including maritime safety zones and the possibility that high cadence could require increasingly frequent, if not permanent, navigation controls.
5. **Quantify impacts on public access**, including commercial and recreational fishing, charter operations, hunting, boating, and navigation.
6. **Evaluate cumulative operational effects using the anticipated launch cadence**, rather than treating each launch as an isolated event.
7. **Establish an early environmental-sensitivity screen** identifying combinations of wetlands, public conservation lands, listed-species habitat, and other resources that weigh strongly against site selection.
8. **Require meaningful state and local participation before preferred sites are chosen**, including fish and wildlife agencies, coastal-management agencies, the Coast Guard, aviation interests, fisheries interests, and affected communities.
9. **Consider low-probability, high-consequence regional hazards**, including major hydrologic changes capable of affecting the long-term viability of permanent infrastructure.
10. **Develop explicit criteria for unsuitable locations**, recognizing that effective national siting policy must identify not only where a spaceport can be built, but where its long-term conflicts make another location preferable.

VI. Conclusion

LWF supports continued American leadership in the commercial space industry and recognizes the need for additional launch capacity. But the scale contemplated by this RFI, and by the Louisiana project now being developed, calls for a siting framework built for the next generation of spaceflight, not the launch cadence of the past. At thousands of launches a year, siting becomes more than a matter of available land and open-water trajectory. It becomes a question of whether repeated launch operations can coexist with the aviation, maritime, economic, public-access, and natural-resource systems already occupying that landscape.

Louisiana illustrates that challenge well. A coastal site may offer ample acreage and direct Gulf access while also lying beside nationally significant wildlife habitat, beneath heavily traveled offshore aviation routes, next to productive public fishing waters, within an established offshore energy complex, and in a landscape exposed to land loss, hurricanes, and long-term hydrologic change. None of that argues against commercial spaceflight. It argues for choosing spaceports carefully. The best national framework will identify these conflicts before billions of dollars are committed and before mitigation is the only option left. We urge the Department to evaluate the full airspace and maritime footprint of high-cadence operations, protect established public uses,

involve state and local resource experts early, and recognize that sometimes the most consequential siting decision is deciding where not to build.

Thank you for the opportunity to comment. LWF welcomes further engagement and is available to provide additional information at the Department's request.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rebecca Triche".

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