

The Space Coast Audubon Society is currently reviewing and commenting on the NASA-KSC SpaceX Roberts Road Environmental Assessment. This is in response to Kennedy Space Centers request for public comment because this Environmental Assessment involves the loss of 100 acres of undisturbed land from the Conservation Buffer set aside by the KSC Master Plan.

The undisturbed land to be developed by the Lessee encompasses 31 acres of upland pine and palmetto scrub and 68 acres of wetland habitat. The Space Coast Audubon Society finds that better land management, low impact development (run-off containment) and space saving construction techniques (up not out) could reduce the loss of conserved land by 50%.

Of note to the Space Coast Audubon Society is Section 3.5 Biological Resources of the EA.

**EA Section 3.5.2.1 Page 27:** *"With 100 percent build-out of the site, up to 31.8 acres of upland shrub and forest habitat, and up to 68.2 acres of wetland and waterway habitats would be lost and converted for purposes of development under the Proposed Action."*

Of special interest is the possibility of impact on the endangered animals that inhabit this area. The U.S. Fish and Wildlife Survey did not find Gopher tortoise or its commensal partner, the Eastern indigo snake, on 31 acres of upland. The recommended mitigation if a burrow is found calls for the construction crew to stop work until the animal leaves the area. Both the wildlife survey and its recommended remedy are questionable.

**EA Section 3.5.2.4 Page 29:** *"a precaution, land clearing, construction, and maintenance personnel would be instructed to report any found burrows, and to halt activities if a gopher tortoise or indigo snake was encountered and allow the animal to leave the area before activities resumed. "These are nice words but experience with construction crews says otherwise."*

The Space Coast Audubon Society has grave concerns with the construction plans in regards to the pine scrub area which is prime habitat for the critically endangered Florida Scrub Jay. It lives in this Scrub habitat almost exclusively! Scrub Jays live in family units and need space to prevent conflict. This project could use land to the south and possible to the south west and leave the scrub habitat for the birds

The Space Coast Audubon Society fully expects this projects Environmental Assessment, as have all others generated by KSC since 1970, to be given a "Finding of No Significant Impact; (FONSI)". We can only hope to mitigate the loss of conserved land and lessen the impact on wildlife.