



**Mission:** To advocate for the healing of the Indian River Lagoon with an independent, unifying voice connecting our community partners.

**Vision:** An Indian River Lagoon of clear waters, lush sea grasses, and thriving wildlife for all to enjoy.

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**Comments on: Draft SEA for Roberts Road SpaceX Expansion and Infrastructure**

([https://docs.google.com/document/d/17Nqr\\_BpJSAVurqTtk9PaOgRwfhXb6ibjAibWjBAgdHE/edit](https://docs.google.com/document/d/17Nqr_BpJSAVurqTtk9PaOgRwfhXb6ibjAibWjBAgdHE/edit))

The Brevard Indian River Lagoon Coalition (<https://helpthelagoon.org/>) supports the world-leading developments taking place at the Florida Spaceport but is deeply concerned about inadequate monitoring and coordinated management of **Cumulative Impacts (SEA § 5)** of this and other existing and coming projects, particularly related to the salinity of the already impaired Indian River Lagoon (IRL), both an Outstanding Florida Water and Estuary of National Significance. Maintaining the proper salinity is crucial to the health of the IRL.

The SEA § 5.2 correctly states that: “Cumulative impacts result from the incremental effect of an action when added to other past, present, and reasonably foreseeable future actions, regardless of the proponent undertaking these actions.” However, Tables 5.1 and 5.2 list only a 19 of the 74 projects recently referred to in the media by Space Florida. The SEA does not provide any details on the area, or run-off potential from any of these projects. It merely concludes, without analysis, that: “Cumulative impacts on water resources from past, present, and future actions within the ROI would be less than significant because BMPs to control stormwater runoff, erosion, and sedimentation would be used throughout all phases of construction for each project. Adherence to permit conditions would reduce impacts and mitigation would compensate wetland losses.”

Going forward, our community needs balance and transparency between space development and our quality of life. That will require comprehensive tracking of all projects and a single coordinated reporting process with public visibility. Without that, “Trust but Verify” becomes only “Just Trust Us.” As the World’s leading spaceport, we can and should do better at that.

## **Additional Comments**

**EA Section - Executive Summary** – The SEA appears to violate the 2020 Spaceport Development Boundary and other development restrictions. The Conservation Boundary variance could establish a precedent for other projects, further undoing effective management of Cumulative Impacts.

**§ 3.5.1.1 Affected Environment** - The project expansion is north of the current SpaceX site into a wetland site rather than west as originally shown in the Plan. Western expansion would destroy less wetland and should be considered as a better alternative.

**§ 3.9.2 Environmental Consequences** - The frequent reference to BMPs to manage stormwater is inadequate. The site design must provide reasonable assurance that post development hydrology will be less than or equal to pre-development (SJRWMD). Please include required site calculations, hydrology, topography, natural drainage information and a plan including specific BMPs to manage an estimated 35 million gallons/year of new stormwater run-off.

**§ 3.9.2.1 Surface Waters** - TMDL values given here are incorrect. BMAP load allocations are calculated based on existing in-place conditions and do not consider additional load expected from new and planned development. Local authority is required to factor in new and planned development and adjust load requirements accordingly (FDEP).

Brevard County and the State of Florida are spending millions to restore and preserve the Indian River Lagoon. The destruction of 31 acres of uplands and 68 acres of wetlands from the KSC Conservation Buffer originally set aside in the 2020 KSC Master Plan and managed by the Merritt Island National Wildlife Refuge (MINWR) would only encourage the additional encroachment. This action appears to contradict KSC/NASA's Environmental Mission Statement: *"with our tools and knowledge to ensure America's 'reach for the stars' protects and enhances the environment."*

Sincerely yours,

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