Indian River Lagoon Roundtable

An environmental discussion group

www.irlroundtable.com

October 10, 2023

To Whom It May Concern,

The Indian River Lagoon Roundtable is a group of informed citizens that recognizes the importance of both the Indian River Lagoon (IRL) and the space industry, and seeks to create a synergistic relationship between America's irreplaceable environmental treasures and its premier launch facility, Cape Canaveral Spaceport. We are concerned with the Roberts Road 100 Acre Expansion Supplemental Environmental Assessment (SEA) as it entails the destruction of critical wetlands and preserved wildlife habitat.

Brevard County and the State of Florida are spending millions to preserve and restore the Indian River Lagoon watershed including wetlands, wildlife habitat and submerged land. The destruction of thirty one acres of uplands and sixty eight 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) will set a dangerous precedent that contradicts NASA-KSC's long standing legacy as a steward of Cape Canaveral's endangered wildlife and the habitat it needs to survive.

IRL Roundtable seeks to maximize the science in order to minimize impact while supporting a growing Spaceport embedded in the last undisturbed land remaining on Florida's Atlantic Coast. We urge Spaceport stakeholders to consider all of Cape Canaveral as a SINGLE SITE and to work cooperatively in its development and stewardship of America's priceless natural resources.

These are early steps in Cape Canaveral Spaceport's commercial development. A variance of the KSC Master Plan's Conservation Boundary will set an unfortunate precedent for what will follow. It is possible that most of KSC's planned Conservation Buffer will be exploited and the resulting environmental impact on the Indian River Lagoon National Estuary watershed could be catastrophic.

Our Roberts Road !00 Acre Expansion Comments are enclosed.

Regards,

Indian River Lagoon Roundtable Members

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Indian River Lagoon Roundtable Comments on the NASA-KSC Roberts Road 100 Acre Expansion SEA

EA Section - Executive Summary - This proposal violates the 2020 Spaceport Development Boundary and other development restrictions. The Conservation Boundary variance, if approved, indicates that these restrictions are void as future such proposals must be given equal treatment.

3.12.2.1 Environmental Consequences of Proposed Action - We estimate that this 100 acre expansion will result in more than 35 million gallons of stormwater run-off annually. Current FDEP permitting allows the Lessee to discharge excess stormwater into MINWR's Oyster Prong, an Outstanding Florida Water. Any form of excess freshwater added to an estuarine waterbody is chemical pollution.

3.5.1.1 Affected Environment - The project expansion is north of the SpaceX existing facility. The original 2018 plan shows future expansion to be east and west of the current land. Why was the west segment not considered an alternative? The map provided indicates west is available rangeland and that an expansion westward would destroy much less wetland than the proposed action. Please consider western expansion.

A maximum footprint of 1.5 million sq. ft. is 35% of 100 acres with 65% open space. Using proper Low Impact Design for the site this footprint could be accommodated on 50 acres and still retain 30% open space. Please review the preliminary site plan and reconsider the area allocation.

3.5.2.4 Wildlife and Protected Species - The U.S. Fish and Wildlife Survey did not find Gopher tortoise or its commensal partner, the Black 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 mitigation are inadequate. Florida Wildlife Conservation Commission wildlife relocation guidelines should be followed.

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 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).

5.0 Cumulative Impact - Continuous air, soil, water and wildlife monitoring, recording and reporting is required in order to reach an understanding of the spaceport's cumulative environmental impact. This section requires, at least, data on current ambient conditions of water quality as well as pre and post development hydrology of significant existing sites.

Tables 5.1 and 5.2 show some of the Spaceport's ongoing projects but do not indicate the land use area or footprint of any. Recently reported information from Space Florida indicates 74 projects are under consideration. These future developments must be considered to determine the space industry's true cumulative environmental impact on the Indian River Lagoon Estuary.