

CCSFS Starship EIS
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Scoping Comments on: Starship-Super Heavy Operations at Canaveral Space Force Station Environmental Impact Statement (EIS)

To Whom It May Concern:

Thank you for the opportunity to comment on the scope of this pending Air Force EIS. These comments are submitted on behalf of myself, a Brevard County resident and I fully endorse the comments submitted by the Indian River Lagoon Roundtable and the Brevard Indian River Lagoon Coalition.

First, I support space exploration, commercialization, and defense. I also believe it is imperative that the full impacts of this project, combined with all the other rapid development taking place at the Florida Spaceport, must be managed and mitigated in order to ensure that our Brevard quality of life and the sustainability of our recovering Indian River Lagoon be protected.

I request that the Air Force and other EIS sponsors consider all potential impacts and ensure adequate mitigation for the full range of impacts associated with the proposed action and other foreseeable developments.

Requested Scope Improvements

While I explicitly address a few specific areas in these comments, I also support full consideration of all EIS "Resources" normally analyzed in an EIS.

1. Alternative 1 (SLC 50)

- I discourage adoption of Alternative 1. It is imperative that the EIS give a complete assessment of the impacts including: the destruction of a large acreage of critical, undisturbed natural land; the destruction of wildlife capable land and wetlands impacted; all impacts on the aquifer and freshwater runoff which could damage the salinity and recovery of our Indian River Lagoon. I request elimination of Alternative 1 from consideration.

2. Cumulative and Indirect Impacts

- It is essential that "Cumulative and Indirect Impacts" be added to this project's current "Resource to be Analyzed in EIS." These will be the most important areas to be considered.
- Reasonably Foreseeable Future Action should be the standard for including Cumulative and Indirect Impacts. Analysis of this project in isolation is insufficient. EIS practice requires analysis and mitigation of these impacts:

- The EIS should “identify activities occurring outside of their jurisdictions that are affecting the same resources being affected by their actions.... The analysis should include the use of trend information and interagency analyses on a **regional** basis to determine the **combined** effects of past, present and future actions.” (emphasis added) (EPA 315-R-99-002/May 1999)
- “CEQ regulations define indirect effects as those that are ‘caused by an action and are later in time or farther removed in distance but are still reasonably foreseeable’” (40 CFR 1508.8)
- An Example: One example where Cumulative and Indirect Impacts must be considered for this project is the dramatic increase in type and demand for usage of the Canaveral Port facilities. Current launch rates of about 100/yr, plus other uses, are already forcing reconstruction to modify the Port. The state of Florida Wharf Study projects an increase in the number of launches from around 100 today to 500 in 2032 and at least 1400 in 2040, a large part of this increase being launches of more impactful “mega” rockets, specifically, Starship/Superheavy, as well as New Glenn. This growth will create major impacts on the Port’s design and operations, and likely on rail and road transport systems as well. Because much of the added port usage will come from increased natural gas transport and storage for fueling launches, there will be an increased risk of the potential severity of gas explosions that must be evaluated and mitigated.
 - Likewise, this EIS process should examine all other types of foreseeable cumulative and indirect impacts as well.

3. Cumulative Mitigation

- The EPA has stated “it is appropriate to suggest mitigation to address cumulative impacts that are caused by activities other than the proposed project. For example, mitigation could include forming partnerships among the different governmental agencies and private organizations to work on environmental restoration....” (EPA 315-R-99-002/May 1999)
- It is noteworthy that Space Florida has initiated a 20-year Environmental Master Planning process to identify, monitor and mitigate developing environmental challenges arising from the Spaceport’s continuing rapid development. I recommend that a similar framework involving key stakeholders affected by the Cumulative and Indirect Impacts of the SpaceX and other foreseeable developments (including space tourism and national security) be an appropriate mitigation approach here.

4. Input Information and Mitigation Details

- The EIS should identify and use the best, most comprehensive inputs/data/information and should identify clearly and completely the models and processes used in the assessments. This information should be made

available in a transparent manner to Brevard and other affected communities, groups, and citizens.

- The EIS findings and mitigation results should be presented in a complete and quantitative manner, describing how the projections will be monitored over time in order to confirm their full implementation and effectiveness.

The construction and operation of the Starship/Super Heavy opens a new era in the operation of the Florida Spaceport at a time when massive efforts are being made to restore the Indian River Lagoon as well as to enhance infrastructure to support our world-leading Spaceport. This project should be executed in a fashion that serves as a model of balance between our growing use of outer space and preservation and enhancement of our terrestrial quality of life.

Thank you once again for the opportunity to make these comments.

Respectfully,
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