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Subject-Comments to Draft Supplemental Environmental Assessment for the Roberts Road SpaceX Operations Area Expansion & Supporting Infrastructure

Since 1994, the Merritt Island Wildlife Association (MIWA) has been the friend's group of the Merritt Island National Wildlife Refuge. Our purpose is to promote conservation, awareness, and appreciation of the Merritt Island NWR and to aid refuge programs. To these ends, MIWA is submitting the following comments and concerns to the above referenced EA.

Acronyms and Abbreviations- LID (Low Impact Development) is listed in this section but not found anywhere else in the EA. LID is an effective approach to lowering the environmental footprint of new and remodeled facilities. There is much generic mention of BMPs in the document to reduce the environmental impact of the proposed action. LID is a BMP that should be required for this project. LID would shrink the size of the stormwater ponds and if done correctly, would reduce the heat island affect and local climate change.

1.6 Public Involvement- How were each of the concerns identified in the 2022 public scoping addressed? It would have benefitted the readers to have a table with the concerns and how these comments were resolved.

2.2.2 Widening of Saturn Causeway-the total square footage of widening the causeway by 8 feet for 3.9 miles results in 164,736 square feet of new impervious surface. How will this additional stormwater be managed? What is the current nutrient load of the swales and how will this expansion affect this? Where do these swales drain? The swales and outfalls along Saturn Causeway should be optimized to reduce nutrient loading to impaired waters through the addition of Stormwater Best Management Practices (BMP) such as nutrient sorbing media within the swales, trash filters and catch basins, or nutrient separating baffle boxes.

3.4.1 Affected Environment-Land Use/Visual Resources. Removing land designated as Operational Buffer/Conservation to Launch Operations and Support is a dangerous precedent.

3.5.1.2 Wildlife and Protected Species-The impact to the Florida Scrub Jay (FSJ) habitat has more negative impact at the proposed action site compared to alternative 1. According to Figure 3.2, the entire proposed action area is potential auxiliary FSJ habitat. The area to the west of the current facility does not include any potential FSJ and should have been considered as the primary area.

3.8 Climate-the EA does not consider the heat island affect that will lower the albedo of the site as well as the edge areas of this site. This impact could be lowered with the use of LID and the planting of trees and using light colors for the buildings. Instead of a parking lot, a parking garage would reduce the footprint of a highly heat absorbing asphalt parking lot and reduce the footprint of the proposed actions.

3.9.1 Affected Environment-The filling of 66.8 acres of high-quality wetlands is treated as a minor issue but considering the destruction of wetlands since the creation of the space center and additional new construction, this is significant. Wetlands provide buffers for storm events and are one of the most productive ecosystems. The mention that wetland mitigation could occur outside of the IRL Basin is unacceptable. The mitigation should occur on the MINWR. If there is not adequate areas for mitigation in the IRL Basin perhaps that is sign that the carrying capacity has been reached.

5.1 Cumulative Impacts-It does not appear that the EA fully addresses the cumulative effects of this and current proposed projects. BMPs are mentioned but few specific BMPS are identified.

5.2.2. Biological Resources. The EA states: *However, KSC and MINWR do have large areas of intact wetlands where some displaced wetland dependent species may establish new home territories.* This general statement needs to be supportive by facts. What is the carrying capacity of these areas where the displaced species may migrate? Are there any studies that can prove this is a successful conservation biology tool?

#### General Comments

LEED- There is no mention of the use of LEED for the design and construction of these facilities. We believe LEED is a requirement at KSC. LEED principles would reduce several environmental issues of the proposed action especially related to utility demands and surface water disturbance. However, it would not negate the negative habitat issues that are described in the EA.

Over a half of billion dollars are being spent by the citizens of Brevard County through a sales tax as well by many state and federal government agencies on projects to repair damage to the IRL from past, poorly managed development. While much of this damage has occurred over several decades it is up to our generation to fix these problems so future generations can once again enjoy and prosper from a healthy IRL. The destruction of wetlands in the IRL watershed will be counterproductive to projects funded by the above agencies. Any increase in freshwater discharges will alter the salinity of the lagoon and endanger the recovery of projects to reintroduce clams. These projects are being funded by US F&WS as well as the citizens of Brevard.

This letter is fully endorsed by the board of directors of the Merritt Island Wildlife Association. We appreciate the opportunity to comment and look forward to working with KSC to preserve the Merritt Island National Wildlife Refuge during this exciting time of expansion, Future development at KSC must not add to the damage that already has occurred to the Indian River Lagoon.

Sincerely,

*Charlie Venuto*

Charlie Venuto

President Merritt Island Wildlife Association