



The Marine Resources Council (MRC) is a not-for-profit organization of 700 members with headquarters in Palm Bay and for the past 30 years has been dedicated to the restoration and preservation of the Indian River Lagoon (IRL). We are concerned that the expansion stated in the subject EA will destroy significant wetland and upland areas that are critical to reaching acceptable water quality in a badly impaired northern IRL.

Comments by Section

Executive Summary - The expansion violates the 2020 KSC Spaceport Development Boundary and other development restrictions. This violation, if approved, sets a detrimental precedent for future development at KSC. These restrictions serve an important purpose; alternative proposals must not further degrade fragile ecosystems. These precedents have consequences.

3.5.1.1 - The projected expansion is north of the existing Space X facility. The original 2018 plan shows future expansion to be east and west of the current land. The western segment has subsequently been developed by a solar energy generating facility. The adjacent land to the east, west, and north contain historically unimpacted native upland and wetland habitats. While not contiguous, over 200 acres of abandoned citrus grove near the intersection of Schwartz Road and NE A Ave should be considered as an alternative development site before impacting native habitat. These abandoned groves currently contain monocultures of the invasive species Brazilian Pepper (*Schinus terebinthifolia*).

Impacts to the native habitats and ecosystem services in the proposed expansion area appear to represent the greatest loss of habitat at KSC since the construction of the Shuttle Landing Facility. Appropriate siting of development projects to minimize habitat impacts at KSC should be paramount given the scarcity of intact native habitats that remain along the Indian River Lagoon. Non-operational areas at KSC are to be managed as a wildlife refuge. KSC should honor this commitment to collaboratively, strategically, and responsibly minimize adverse impacts to natural resources.

Furthermore, Low Impact Development and Green Infrastructure practices should be implemented to reduce secondary impacts to adjacent habitats. A maximum footprint of 1.5 million sq. ft. is 35% of 100 acres with 65% open space. By using 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.

3.9.2 - The frequent reference to BMPs to manage stormwater is inadequate. The site design must provide reasonable assurance that post development hydrology will be less negatively impactful to the already impaired receiving body of water or at least equal to pre-development (SJRWMD). Please include required site calculations and information on hydrology, topography, natural drainage, and the plan to manage an estimated 35 million gallons/year of new run-off.



3.9.2.1 - 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 - Tables 5.1 and 5.2 show some of the projects on the Cape but do not indicate the land use area or footprint of any. Recently reported information from Space Florida indicates 74 projects under consideration. These projects, or their equivalents, must be considered for their cumulative impact on the IRL. 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. Please provide.

A handwritten signature in black ink, appearing to read "J. B. Moir", is written over a large, faint, circular watermark or stamp.

James B. Moir

Chairman, MRC Board of Directors