



Indian River Lagoon Roundtable

An environmental discussion group

www.irlroundtable.com

CCSFS Starship EIS
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To Whom It May Concern,

The [Indian River Lagoon Roundtable](#) is a grassroots environmental discussion group that unifies and amplifies the voice of all Indian River Lagoon citizens. We are seeking a synergistic relationship between the Indian River Lagoon National Estuary and the Cape Canaveral Spaceport.

We are concerned that the rapid, on-going development at the Spaceport does not fully consider its cumulative impact on the badly impaired Indian River Lagoon National Estuary (IRL). If development continues in the current piecemeal fashion the Indian River Lagoon National Estuary may be irreparably damaged. Current and future development throughout the Cape Canaveral Spaceport must be done in a manner that ensures no adverse impact to the National Estuary.

Below are the IRL Roundtable's comments on the EIS for SpaceX Starship-Super Heavy Operations at CCSFS.

Alternative 1

- Alternative 1 is unacceptable and should not be considered. The destruction of a large acreage of critical, undisturbed natural land will mean the significant loss of already diminished wildlife capable land especially wetlands. It will also mean the loss of valuable recharge land for our diminishing aquifers. Additional acres of new impervious surface will result in millions of gallons of new fresh water runoff to further damage our salty lagoon.

Cumulative Impact

- Cumulative impact is not among the EIS resource study areas and may provide the most important scoping outcome of all. The operational and environmental impact of the future proliferation of space industry activity at the Cape will dramatically impact every area listed in the EIS scoping document. We request that Cumulative Impact be added to this EIS and that an air, soil and water monitoring programs with full data discovery and modeling be established to study this proposal's cumulative impact.

Expectations

- As indicated in your charts, the cooperating agencies shown do not include several key organizations with major involvement and active roles. Examples include Space Florida, Department of Interior/Fish & Wildlife Service, U. S. Army Corps of Engineers, and the National Oceanographic and Atmospheric Administration. The listing should include all organizations with roles in developing any part of the Cape Canaveral Spaceport.
- We request that all EIS results be provided as actual, current data with source references, sensors, location, date and time of collection. We expect specific, empirical information and share the models used to produce it. We expect the EIS will include specific information such as current non-point volumetric flow into surface waters and model(s) depicting the volumetric flow post development.
- We expect that this project will demonstrate the USSF/SLD45 commitment to DOD Directive UFC 3-210-10 Low Impact Development.

The Environmental Impact Statement for SpaceX Starship-Super Heavy Operations at Cape Canaveral Space Force Station is a milestone in the development of America's premier spaceport. It demands singular attention by all stakeholders as the manner of its execution will set the precedent for all future Cape Canaveral Spaceport development.

This proposal and those that follow will drastically affect the National Estuary, all EIS resource study areas and Brevard County's quality of life. America's premier spaceport must be built with a balanced environmental approach that leads us to the future of space that we all support, while preserving the National Estuary and improving our quality of life; the synergy of Nature and Space.

Thank you for this opportunity to comment on the upcoming EIS for SpaceX Starship-Super Heavy Operations at CCSFS.

Sincerely,

David C. Botto, Lt. Col (Ret.), USAF
for the [Indian River Lagoon Roundtable](#)

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"We're only seeing the first steps in major developments at the spaceport and are seeking to minimize the impacts and maximize the science information while supporting a growing spaceport embedded in a large wildlife refuge."

Dr. Al Koller, October 2023