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

Brevard County was one of Florida's top seafood producing counties. Prior to the development of the Kennedy Space Center on the barrier island and a massive influx of human population on the mainland, the Indian River Lagoon supported hundreds of families through commercial and recreational fishing and other tourism related activities. Due to destruction of IRL water quality and seagrass habitat, commercial fishing activity has nearly ceased, and recreational guides have fled our area to find other locations where they can find and keep fish for their clients.

Construction of the crawlerway and the SR 3 causeway over Banana Creek destroyed the connection between the Indian River and the northern Banana River. As a result, vast oyster beds died and water quality in Banana Creek suffered. All of the saltmarshes on KSC were diked and converted to freshwater pond impoundments.

It is with these thoughts in mind that I submit the following comments and concerns to the above referenced Draft Supplemental EA:

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 the stormwater be managed? This is an opportunity for the use of infiltration trenches to be run along the roadway. They can be outfitted with BAM (Biosorption Activated Media) to extract nutrients from stormwater before it percolates into the ground.

There is no detail in the document on how the Pintail Creek culverts will be addressed. Much of the environmental damage from past development of KSC involved cutting off salt marsh and waterways with roadways and dikes to make impoundments. The optimal solution for mediation of past mistakes will be to build a bridge at the location of the Pintail Creek culverts. At the very least, the Pintail Creek culverts should be enlarged, and additional culverts added to increase water circulation.

The open water connection between the Indian River and Banana Creek must be restored. Adding more infrastructure at this time will make that task even more difficult.

3.5.1.2- Wildlife and Protected Species - The impact to 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 habitat and should be the alternative.

3.9.1- Affected Environment - The filling of 66.8 acres of high-quality wetlands is treated as a minor issue but, if you add up all the destruction of wetlands since the creation of the space center and add to that the impacts of additional new construction, it is a significant issue. 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. Mitigation for wetlands destruction on Merritt Island National Wildlife Refuge should occur on MINWR.

3.9.2- Environmental Consequences – Discharges from stormwater and treated industrial wastewater must be kept away from the wildlife refuge impoundments. Once highly productive essential fish habitat, diking of the saltmarshes in the 1960s destroyed their effectiveness as nurseries for economically important finfish, shrimp, shellfish, and crab species. Reconnection of the saltmarshes to the estuaries was accomplished through the addition of culverts and they returned to their role as essential fish habitat as nurseries for these important species. Even if all nutrients are removed, freshwater is a pollutant to a healthy estuary.

Low Impact Development (LID) is an effective approach to lowering the environmental footprint of new and remodeled facilities. There is much generic mention in the Supplemental EA of BMPs 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.

5.1- Cumulative Impacts - It does not appear that the Supplemental EA fully addresses the cumulative effects of this project and current proposed projects.

Over a half billion dollars are being spent by the citizens of Brevard County through a sales tax, and funding is coming from many state and federal government agencies on projects to repair damage to the Indian River Lagoon from past, poorly managed development. The destruction of wetlands in the watershed will be counterproductive to projects funded by the above agencies, as will freshwater discharges to the wildlife refuge impoundments or the Indian River itself. Any increase in freshwater discharges will alter its salinity and hinder the recovery of seagrass and endanger the success of projects to reintroduce clams and oysters. Construction of Space Center projects in the 1960s severely damaged the Indian River Lagoon. Kennedy Space Center should be held to the same standard as Brevard County citizens and repair the damage that occurred and ensure that no future projects further degrade the Indian River Lagoon.

Sincerely,  
Laurilee Thompson