



SJRA electronic comments on the FAA proposal to exempt commercial space launch licenses and permits from environmental regulation - submitted August 31, 2026

St. Johns Regional Audubon (SJRA) located in NE Florida opposes the Federal Aviation Administration's (FAA) proposal to exempt commercial space launch license and permits from 13 environment and conservation laws for the following reasons:

1. The proposed waiver rule is too broadly crafted and is vague. While on its surface, it would be applicable to "commercial space licenses or permits", the language proposed would draw in other regulatory processes, such as building new launch sites and could apply to permits issued by other agencies such as U.S. Fish and Wildlife Service (USFWS) permits for "incidental take" of protected species.
2. The commercial launch sites within the NASA Kennedy Space Center (Space Center) and Canaveral Space Force Station (Space Force Station) are uniquely situated because they are surrounded by Merritt Island National Wildlife Refuge (MINWR) and Canaveral National Seashore (CNS). The SJRA and its members are part of the 1.5 million annual users of MINWR and can attest to its special attributes. We are also part of the 2.5 million annual visitors to CNS. CNS and MINWR contain one of the richest and most diverse ecosystems found in the United States with 1,500 species of plants and animals. 358 species of birds have been identified in MINWR, and 310 species of birds have been identified in CNS due to their being principal stopover points for migratory birds on the Atlantic Flyway. In fact, waterfowl populations during winter are routinely documented at over 100,000 individuals. In addition, these lands serve as irreplaceable breeding habitat for such species as Brown Pelicans, Bald Eagles, Roseate Spoonbills, and Reddish Egrets. The unique location of the Space Force Station and Space Center in the middle of such a rich and rare conservation area requires careful consideration of all of the impacts that additional commercial space aviation could create.
3. We understand that SpaceX alone is proposing a total of 120 additional launches per year from Space Flight Center and the Space Force Base. If this is the case, commercial space flight from the Cape Canaveral complex alone may reach a level of one launch every two days out of the year. We also understand that the effect of

Starship Superheavy launches producing noise and vibration will exceed the impacts of all previous space vehicles launched from KSC and CSFS. Saturn V vehicles launched produced approximately 7 million pounds of thrust, whereas Starship Superheavy vehicles launch with 17 million pounds or more thrust. Cooling water discharge volumes from the launch pads also will be unprecedented during Starship Superheavy launches, with water use projected at approximately 1 million gallons per launch. Surely, the added impacts of 120 additional launches need careful consideration given the amount of taxpayer dollars that the Federal Government has expended over the years to develop the MINWR and CNS for conservation and their importance to tourism in Florida.

4. There is no demonstrated need for any waivers that the FAA is proposing. The integrated cooperative management of the Cape Canaveral area by the USFWS, NASA, and the US Air Force (under the 13 laws FAA now proposes to waive) has allowed the habitat and wildlife within MINWR and CNS to co-exist with space travel in the area. This beneficial relationship has occurred through the 6 launches conducted during the Mercury space flight program, 17 Apollo space missions, 135 Space Shuttle missions, and commercial space missions that reached a pace of 100 Falcon 9 launches per year in 2025. The integrated cooperative management of the area has worked and continues to work.

Based on this information, the SJRA believes that the protections currently provided by the 13 statutes the FAA proposes to waive should instead be vigorously enforced with respect to all commercial space activities at the Space Flight Center and Space Force Base.