

April 24, 2025

Ms. Eva Long  
Environmental Protection Specialist  
Office of Commercial Space Transportation  
Federal Aviation Administration  
1902 Reston Metro Plaza  
Reston, Virginia 20190

Re: Draft Environmental Assessment for SpaceX Falcon 9 Operations at Space Launch Complex 40, Cape Canaveral Space Force Station, March 2025  
ID Number: EAXX-021-12-000-1737545438

Comments of United Launch Alliance, LLC and United Launch Services, LLC

Dear Ms. Long:

Please accept these comments on the Federal Aviation Administration's ("FAA") above referenced Draft Environmental Assessment (the "draft EA"). SpaceX proposes to increase the number of Falcon 9 launches from Space Launch Complex ("SLC") 40, located at Cape Canaveral Space Force Station ("CCSFS"), from 50 to 120 per year, and to establish a new landing zone located at SLC 40 to land 34 Falcon 9 boosters per year.

The draft EA seeks to assess the potential environmental impacts of this proposed action, including potential impacts to human health and the environment caused by the increased cadence and new landing zone. In conjunction with the draft EA, the Department of the Air Force (DAF), as a cooperating agency, has prepared a Draft Finding of No Significant Impact (FONSI) and Finding of No Practical Alternative (FONPA) for the proposed action. Both the draft EA and the draft FONSI focus almost exclusively on environmental impacts outside CCSFS and the Kennedy Space Center ("KSC").

ULA conducts its launch operations at CCSFS from SLC 41, which is approximately 1.5 miles from SpaceX's SLC-40 launch site and proposed new landing zone. ULA submits these comments for the FAA and DAF's assessment of potential impacts from the proposed action.

### **Summary of Issues**

Both the proposed increase in launch frequency and the new landing zone at SLC 40 present new risks and potential operational impacts to ULA and other launch and government operations at CCSFS and KSC. The draft EA considers only impacts to those parties *outside* of CCSFS and KSC, yet neighboring launch and government operations *within* CCSFS and KSC are a key part of the environment around SLC 40. In the final EA, the FAA and DAF should consider:

- Any potential **operational impacts and disruptions** from the increased launch cadence and new landing site, including evacuation zones or remain-in-place restrictions; road closures; restrictions on hardware and spacecraft staging, movement and processing; management of the launch manifest; and shared resources, including deluge water supply, commodities and commodities infrastructure, electricity, and wastewater-management facilities.
- Any potential **structural harms** to critical infrastructure and potential physical damage to spacecraft, launch vehicle components, and launch support equipment posed by the increased launch cadence and new landing zone, with a particular

emphasis on the risks posed by repetitive exposures to noise and sonic boom overpressures on potentially sensitive structures, spacecraft, launch vehicle components, and launch support equipment.

- The sufficiency of the existing **financial-responsibility** regime in assessing, quantifying, and compensating any claims for damage from the proposed action.
- Any threats to **assured access to space** imposed by these potential operational and physical impacts to other launch operators in the competitive and increasingly congested launch environment at CCSFS and KSC.

These risks and potential impacts must be considered in combination with the cumulative impacts from other ongoing activities, including SpaceX's proposed launches of its Starship Super Heavy launch vehicle from SLC 37 at CCSFS and LC 39A at KSC, currently under review. The draft EA recognizes that an analysis of these cumulative impacts is required, but it defers any meaningful assessment to the anticipated Environmental Impact Statements ("EISs") for Starship Super Heavy launches from CCSFS and KSC. The FAA has an obligation to consider those cumulative impacts now, in this assessment.

CCSFS and KSC are thriving space hubs in a small footprint that are facing even more growth over the next decade. Launch operators at CCSFS and KSC share the same finite infrastructure and airspace, so it is essential to consider the full picture of cumulative impacts from proposed launches at the various sites located at CCSFS and KSC. Otherwise, siloing and segmenting those analyses is certain to underestimate or miss serious impacts from the proposed actions, placing our country's access to space at risk.

### **Conclusion**

ULA offers these comments as part of its ongoing efforts to engage with the FAA and the DAF on the problems and potential impacts of the launch ecosystem at CCSFS and KSC. ULA is eager and willing to participate in any efforts undertaken by the FAA and the DAF to further examine and assess these important issues, whether it be in the capacity of providing information to an independent review team, as part of a rulemaking initiative, or in support of agency-led efforts identified in the draft EA, such as the DAF's Range of the Future initiative.

Respectfully submitted,

United Launch Alliance, LLC  
United Launch Services, LLC