



February 21, 2014

Ms. Stacey M. Zee, Environmental Protection Specialist
Federal Aviation Administration
Shiloh Launch Complex EIS
c/o Cardno TEC Inc.
2496 Old Ivy Road – Suite 300
Charlottesville, VA 22903

Dear Ms. Zee,

On behalf of the National Wildlife Refuge Association (NWRA) and its membership comprised of current and former US Fish and Wildlife Service professionals, over 200 Friends organization affiliates and concerned citizens, we are writing to express our opposition to the proposal to develop a launch site in the Shiloh area of the Merritt Island National Wildlife Refuge (MINWR).

We have reviewed the technical assistance letter submitted by U.S. Fish and Wildlife Service on January 3, 2014 to the Federal Aviation Administration and concur with the Service that a rigorous analysis is needed of the application and we urge you to consider other sites for the launch site.

We are not in opposition to commercial launch sites and we do believe they can provide significant economic benefits to the community and the state. Our concern with this proposal is the location of the site, the significant environmental impacts it would have, and the ready alternative of using existing infrastructure in this area.

Merritt Island National Wildlife Refuge lies within one of the most productive estuaries in the country, the Indian River Lagoon. It supports more than 1,000 species of plants and more than 500 species of fish and wildlife. It is home to numerous threatened and endangered wildlife such as West Indian manatee, loggerhead sea turtle, leatherback sea turtle, Kemp's Ridley sea turtle, Southeastern beach mouse, and Florida scrub-jay. Freshwater impoundments on the refuge provide habitat to migratory waterfowl and many of Florida's iconic wildlife: alligators, wading birds, and bald eagles.

Florida scrub-jay is an especially vulnerable species because it depends on oak scrub habitat that is under constant threat of development. The proposed launch site is habitat for 31 of the 215 Florida scrub-jay families on the refuge. Considerable effort has been invested in supporting this species, and the development of a launch site would directly undermine these investments and the success accomplished to date.

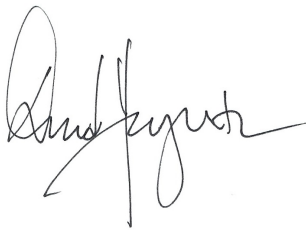
Many threatened and endangered species on the Refuge, such as the Florida scrub-jay, Southeastern beach mouse, and gopher tortoise, are dependent upon regular prescribed burns, which result in nutrient-rich new plant life. The location of the proposed launch facilities would impede the ability of the Service to conduct prescribed burns, resulting in degraded habitat.

In addition, the launch site and associated infrastructure demands will cause significant impact to wildlife. Altered hydrology and water regimes would degrade habitat for manatees, rare snakes and fish. The proposed infrastructure will cause fragmentation of habitat, clearing, and vehicle strikes would be likely to increase the mortality of the threatened eastern indigo snake. Artificial lighting of the launch pad would negatively effect the migration of piping plover and roseate tern, and would threaten turtle hatchlings that are disoriented by artificial lights as they struggle to move from nests to the ocean in their first minutes after hatching.

Merritt Island National Wildlife Refuge hosts diverse wildlife that attracts more than 1.1 million visitors a year including anglers, hunters, kayakers, birders, wildlife enthusiasts, and photographers. The local economic effect of recreational visits to the refuge is \$60.4 million. The associated 466 jobs provide \$18.1 in employment and \$7.5 million in tax revenue.

Wildlife is good for the local economy. Removing 200 acres from the Merritt Island National Wildlife Refuge and the degradation of additional habitat does not make sense for the wildlife legacy we will leave the next generation. This land has already been determined to be of such importance to be protected as a National Wildlife Refuge, it is an asset to the American public, and wildlife conservation is an American value older than space flight. We urge the FAA and others to consider other sites such as the existing launch pads rather than disrupting valuable habitat within the Merritt Island National Wildlife Refuge.

Sincerely,

A handwritten signature in black ink, appearing to read "David Houghton". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

David Houghton
President