



October 4, 2024

To: Caryl Hart, Chair, California Coastal Commission  
Cc: Kate Huckelbridge, Executive Director, California Coastal Commission  
Wesley Horn, Coastal Program Analyst, California Coastal Commission

**Re: Item Th9a – Increasing SpaceX Falcon 9 launch activities to 50 per year**

Dear Chair Hart and Commissioners,

The Surfrider Foundation and Audubon California submit the following joint comments regarding the consistency determination by the Department of Air Force (DAF) for the proposed expansion of the Space Exploration Technologies Corporation's (SpaceX) Falcon 9 Space Program at Vandenberg Space Force Base (VSFB) in Santa Barbara County to increase to 50 rocket launches annually.

Surfrider previously submitted comments on this issue at the Commission's April, June and August meetings, expressing concern about the rapid increase in the frequency of rocket launches. In August, we supported conditional concurrence for up to 36 launches annually. While we appreciate DAF's acceptance of the Commission's conditional concurrence from August, we are concerned about the proposed increase to 50 launches. The increase from 36 to 50 launches may be relatively minor but the increase from 6 to 50 launches over two to three years is extremely rapid. More information and data is needed on potential impacts before agreeing with additional launches.

Given the potentially significant impacts of SpaceX's proposed program expansion on beach access, water quality, and coastal species, we must proceed with caution. Potential impacts to coastal avian species are particularly concerning. For example, according to the staff report, "The USFWS also found that the proposed project is likely to adversely affect but would not likely jeopardize the continued existence of California Red-Legged Frog (*Rana draytonii*) and threatened Western Snowy Plover (*Charadrius nivosus nivosus*)" (from page 22). Given the disturbing potential for population level impacts and the great uncertainty, more frequent launches are not appropriate at this time.

Vandenberg Space Force Base sits within the Snowy Plover recovery unit (RU) 5. Based on the 2024 Pacific Coast Distinct Population Segment of Western Snowy Plover 5-year review, RU5 continues to hold the highest number of Snowy Plovers out of the 6

regional units<sup>1</sup>. However, since the 2019 Review, breeding adults counted during the breeding window have declined. The 2024 Review describes threats that Snowy Plovers are faced with which include increased rocket launches from spacecraft. The Review states, “During the terrestrial sonic boom events plovers exhibit stress responses such as hunkering down over the nest or abandoning the nest, which may have resulted in damage to eggs and embryos.” Increased nest abandonment was documented in 2023 and trends showed abandonment was higher for sites closer to rocket launches.

Increased launches at VSFB, carrying one of the largest snowy plover colonies along the U.S. West Coast, could have disproportionately negative impacts to the entire range and must be approached with caution. While these impacts and number of launches will be new to California, populations of Piping Plovers in Texas have shown what the potential impacts are when we increase launches. Based on data from Boca Chica, Texas, Piping Plover population occupancy decreased by 54%<sup>2</sup>. From the 2024 Review, the RU5 Snowy Plover population sits at 676 birds, which is significantly less than the recovery goal of 1200 breeding adults. A drop in population will move us further away from our goal to recover this threatened species.

While predators are an issue at military sites and predator management has been proposed, more must be done to protect these vulnerable species. We support the restoration opportunity at the Santa Ynez River Estuary, as Audubon California created a restoration design for the site several years ago funded by the California State Coastal Conservancy. However, the Environmental Species Act mitigation policy does not allow for retroactive mitigation. While we wait for two years to pass to monitor impacts from the increased launches, we could be putting Snowy Plovers at great risk. We believe mitigation should also be requested both on and off-site and an In-Lieu Fee (ILF) program be established to help fund these mitigation projects. Unfortunately, conservation banks aren't easily feasible with the lack of habitat and development along our coast. This ILF program can offer an opportunity to conserve existing areas Plovers depend on and ensure their population remains stable.

In August, DAF was required to submit monitoring and mitigation plans under conditional concurrence. The Commission should not consider more frequent launches until more robust and complete data from those plans is collected and analyzed,

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<sup>1</sup> USFWS, Pacific Coast Distinct Population Segment of Western Snowy Plover 5-Year Review, 2024 ([https://ecosphere-documents-production-public.s3.amazonaws.com/sams/public\\_docs/species\\_nonpubli sh/19614.pdf](https://ecosphere-documents-production-public.s3.amazonaws.com/sams/public_docs/species_nonpubli sh/19614.pdf))

<sup>2</sup> Lipton, Eric. “Wildlife protections take a back seat to SpaceX’s ambitions” *New York Times*, 7 July 2024, [https://www.nytimes.com/2024/07/07/us/politics/spacex-wildlife-texas.html?unlocked\\_article\\_code=1.5U0.lrUE.d6z3KNQB\\_TLG](https://www.nytimes.com/2024/07/07/us/politics/spacex-wildlife-texas.html?unlocked_article_code=1.5U0.lrUE.d6z3KNQB_TLG).

especially for impacts to coastal species including threatened snowy Plovers and endangered CA Least Terns.

Sincerely,

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