August 30, 2011

Shari A. Silbert
Manager, Site-wide PEIS
NASA Goddard Space Flight Center's
Wallops Flight Facility, Code 250.W
Wallops Island, Virginia 23337

Re: Response to Public Comment Opportunity on WFF Site-Wide PEIS

Ms. Silbert,

Space Florida would like to respond to the opportunity for public comment available under the ongoing Programmatic Environmental Impact Statement (PEIS) for expanding operations at the Wallops Flight Facility (WFF). An essential part of the PEIS process is to inform persons and agencies that may be interested or affected by a government action. Enhancing the capabilities of WFF to allow NASA greater collaboration with other federal agencies is commendable and is to be encouraged. However, the potential development by NASA of not only duplicative, but also competing, launch infrastructure for orbital human spaceflight, funded in part by our tax dollars, gives the State of Florida standing in this federal process.

The development and maintenance of the requisite ground systems and infrastructure needed to safely support orbital human spaceflight is something with which Florida is acutely familiar. The resources necessary to put in place all new infrastructure at a separate location, particularly in an era of fiscal austerity, seems contrary to the best interests of the agency in particular and of taxpayers in general.

Some of the concerns of Space Florida relate to these developments being openly in conflict with the NASA Authorization Act of 2010, where it clearly states: ***"It is the sense of Congress that NASA needs to rescope, and as appropriate, down-size, to fit current and future missions and expected funding levels"*** (SEC. 1101. SENSE OF CONGRESS).

Additionally, the Act also requires the NASA Administrator to develop a ***"strategy to evolve toward the most efficient retention, sizing, and distribution of facilities .... and other infrastructure"*** (SEC. 1102. INSTITUTIONAL REQUIREMENTS STUDY).

Finally, the Act proclaims that the agency will ***"assist and provide aid to communities that are adversely impacted by NASA program changes, contract or program cancellations"*** (SEC. 1104. SENSE OF CONGRESS ON COMMUNITY TRANSITION SUPPORT). With the recent retirement of the Shuttle no community is more egregiously impacted than Florida. It seems that building redundant facilities in Virginia will only further exacerbate that adverse impact, contrary to the 'Sense of Congress'.

Since NASA/WFF has chosen to embark upon the more rigorous Programmatic Environment Impact Statement (PEIS) process, it does so with the full understanding that a vigorous review is anticipated. As

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a PEIS, the obligations of the agency are to provide specific and adequate detail on the proposed alternatives to fully evaluate the direct, indirect and cumulative impacts of each. Those proposed alternatives represent the 'heart' of that document. It is that analysis that is the primary purpose of the exercise and the justification for the considerable expense associated with a PEIS.

The documentation provided in the Federal Register (11Jul11) and at the public scoping meeting (3Aug11), fail to offer sufficient information to allow for the requisite comprehensive analysis. Inasmuch as this proposed development constitutes a potentially significant adverse impact to the interests of the workforce in Florida, and to all of us as taxpayers, we would very much like to have a more complete understanding of those alternatives.

Perhaps it may be appropriate to hold an additional public scoping meeting here on the Space Coast as this process proceeds forward?

Please feel free to contact me for any questions.

Respectfully,

Frank A. DiBello
President & CEO
Space Florida

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