

Save RGV
Bill Berg, Agent
613 W Saint Charles Street
Brownsville, TX 78520-6303
billberg42@gmail.com

www.SaveRGVfromLNG.com



Directors
Patrick Anderson
Bill Berg
Mary Angela Branch
Jim Chapman
Maria Galasso
Martha Pena
Molly Smith

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Brian Rushforth
Chief of Staff
Office of Commercial Space Transportation
Federal Aviation Administration
Brian.rushforth@faa.gov

Wayne Monteith
Associate Administrator for Commercial Space Transportation
Federal Aviation Administration
Wayne.monteith@faa.gov

Daniel Murray
Manager, Safety Authorization Division
Office of Commercial Space Transportation
Federal Aviation Administration
Daniel.murray@faa.gov

Dear Mr. Rushforth, Mr. Monteith, and Mr. Murray,

This letter is on behalf of Save RGV, a Texas non-profit corporation, which has been following the permitting, construction, and operations of the SpaceX rocket testing and launching facility at Boca Chica, Texas. With the imminent testing and launching of the Starship Super Heavy, and the utter silence from the FAA, we are, frankly, very alarmed.

In 2017 the Federal Energy Regulatory Commission required, as part of the permitting requirements for three proposed LNG liquefaction export terminals, that a third-party launch failure analysis be done for SpaceX's planned launches of their Falcon9 and Falcon Heavy rockets from their Boca Chica launch site. FERC in subsequent correspondence reiterated this need to know "individual and cumulative launch failure impacts for this area" and "vulnerabilities and the relative likelihood of debris from a damaged launch vehicle impacting this site." The site of the three proposed LNG facilities [now two] is 5 to 6 miles from the SpaceX launch site. The engineering firm used by FERC to assist with their analysis was Millennium Engineering and Integration Company. Their analysis was based on SpaceX's approved plan to launch its in-use Falcon 9 and Falcon Heavy rockets up to 12 times a year from Boca Chica. While the Millennium analysis itself is a non-public document, the conclusion stated that the Falcon 9 and Falcon Heavy launches would not pose a significant risk to the proposed LNG terminals. Millennium, as part of their reporting, concluded that they could not complete a Starship analysis because of its experimental nature and there was at the time no definite knowledge that it would ever be launched near the projects being reviewed.

As you are aware, much has changed since 2017. No Falcon 9 or Falcon Heavy has ever been launched, and the Boca Chica facility has been greatly expanded and turned into a construction, testing and launch facility for the Starship and Starship Super Heavy. There have already been four Starship explosions. The most recent explosion, SN11, occurred on March 30, 2021 at altitude, and scattered

debris and shook windows as far as South Padre Island and Port Isabel, 5 miles from the launch site. SN11 had three raptor engines. Super Heavy, as currently configured, has 29 raptor engines. The impacts of a Super Heavy explosion would be an order of magnitude greater than the SN11 explosion.

We believe that Starship Super Heavy poses an unacceptable risk of harm to the nearby communities of Port Isabel, Long Island Village, and South Padre Island, as well as to the immediately adjacent national wildlife refuge, state park land, and surrounding fragile tidal wetlands.

We do not understand why the FAA is allowing the testing and possible launching of such a massive rocket in this sensitive and populated area. This testing should be done at a designated rocket testing facility such as the NASA Stennis Space Center, which is where the Saturn V was tested and where the SLS rocket (for the Artemis Program) is currently undergoing testing, prior to its launching at Cape Canaveral.

Until such time that the FAA releases the results of a Starship Super Heavy launch failure analysis, with worst-case scenarios, the public must assume that the launching of Starship Super Heavy from Boca Chica poses an unacceptable risk of harm to life and property to the nearby communities. SpaceX has a history of being the tail that wags the dog – and letting the regulatory agency try to catch up. The FAA's first and foremost responsibility is to the public's safety. Its second should be transparency with the public it serves. With respect to SpaceX at Boca Chica we have seen little evidence of either.

Sincerely,

Jim Chapman
Bill Berg
Patrick Anderson
Mary Angela Branch
Maria Galasso
Marta Pena
Molly Smith