SpaceX Comment to DOT/FAA on Spaceport Siting and Launch Corridors

Page-referenced breakdown of comment FAA-2026-9736-0263 (Docket FAA-2026-9736)

The filing at a glance

Item	Detail
Filed by	Space Exploration Technologies Corp. (SpaceX)
Signed by	Mat Dunn, Vice President, Government Affairs (p. 24)
Dated	October 26, 2026 (p. 1)
Addressed to	Secretary of Transportation Sean P. Duffy (p. 1)
Docket	FAA-2026-9736, "Siting New Spaceports and Use of Priority Airspace for Critical Space Launch Corridors" (p. 1)
Comment ID	FAA-2026-9736-0263
What it is	A response to a Request for Information (RFI) published August 25, 2026 (91 Fed. Reg. 54,909). It is a set of policy recommendations, not a permit application, license request, or launch authorization.
Length	24 pages, 106 footnotes, 1 table, 3 figures
Link	https://www.regulations.gov/comment/FAA-2026-9736-0263

How to read this document

Everything in the summary sections reports **what SpaceX wrote**. As a record of what SpaceX said, it is HIGH confidence (primary source). The underlying claims (for example, that NEPA review "does not make a vehicle safer") are SpaceX's positions, not verified facts.

Orange boxes like this one are **analysis**, not confirmed fact.

Bottom line

- SpaceX says the rocket is no longer the bottleneck. The FAA's air traffic processes and regulatory reviews are (pp. 1, 8).
- It asks the government to create permanent, charted **launch and reentry corridors** where qualifying flights get airspace priority, automatic approval within 48 hours, and no airspace fees (p. 2).
- It pushes hard to **shrink or eliminate environmental review**: finalize the proposed statutory waiver without narrowing it, add categorical exclusions, and treat corridors as exempt from NEPA (pp. 6-7, 20-21).
- It proposes **loosening reentry safety thresholds over populated land**, including a 10x increase in one casualty-risk limit when shelter-in-place alerts are used (pp. 22-23).

- Starbase Louisiana appears **three times**, briefly, as an example of a high-cadence private site (pp. 4, 16, 19-20).

Every mention of Starbase Louisiana

Page	What it says
p. 4	SpaceX "is constructing a second facility in Starbase, Louisiana" and is investing billions of dollars in its Texas and Louisiana sites to make them the highest-capacity production and launch/reentry sites in the world.
p. 16	Arguing for automated approvals: "At up to 30 launches and reentries a day, manual coordination cannot keep up." (Louisiana is not named in this sentence, but the figure matches the p. 20 description.)
pp. 19-20	Starbase, Texas, and the planned Starbase, Louisiana, spaceport, "which is designed for approximately 30 launches and reentries per day," are described as exactly the kind of high-cadence sites where corridors would deliver the most benefit.

What the filing does not say about Louisiana

- No timeline for construction or first launch.
- No number of pads or towers.
- No claim that 10,000 launches a year would come from Louisiana. The 10,000 figure on p. 1 is company-wide ("SpaceX anticipates conducting 10,000 launches per year itself"). Musk's Oct 28 statement tying 10,000 to Louisiana was a separate social media post, not part of this filing.
- No discussion of Louisiana-specific environmental, coastal, or community impacts.

> **Analysis**
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> The p. 4 wording ("is constructing") presents Starbase Louisiana as already under construction. That is worth comparing against the actual federal and state permitting record before repeating it, since so far there has only been one permit application for a heavy-use road.
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> 30 per day sustained all year works out to about 10,950 operations. Note SpaceX counts **launches and reentries together**, so 30 operations per day is not the same as 30 launches per day.

Section-by-section summary

Opening and framing (pp. 1-2)

- Cites the President's National Space Transportation Policy (NSTP, Aug. 20, 2026) goal of more than 1,000 launches and reentries per year by 2030, and the RFI's forecast of 10,000 per year by 2035 (p. 1).
- States SpaceX alone anticipates 10,000 launches per year, compared with 182 licensed U.S. launches and 7 licensed reentries in 2025 (p. 1).

- Says FAA's air traffic structure and regulatory reviews "are now the binding constraint" on launch cadence, and that fixing it needs no new money, technology leaps, or federally subsidized sites (pp. 1-2).
- Compares corridors to the federal civil airways created by the Air Commerce Act of 1926 (p. 2).
- Frames the effort as necessary to "stay ahead of China" (p. 1).

Top-line airspace recommendations (pp. 2-3)

- **Corridors for launch and reentry**, covering ascent, booster return, reentry, and landing at every spaceport with recurring operations. Missions inside them get airspace priority, automatic approval within 48 hours, and a waiver of airspace fees (p. 2).
- **Implement FAA's own 2020 CSINAS Concept of Operations** and the 2019 Airspace Access Priorities ARC recommendations: just-in-time corridors, real-time debris analysis, and hazard zones that move with the vehicle (p. 2).
- **Integrate FAA's Space Data Integrator (SDI) and SpaceX's own Cleared platform** into FAA's new flow management tools. SDI is currently limited to the FAA Command Center in Warrenton, Virginia (pp. 2-3).
- Says SpaceX gives Cleared and its API free to most major U.S. airlines and is expanding it to foreign air navigation providers (p. 3).

Siting and investment recommendations (pp. 3-4)

- Federal money should go to shared infrastructure (pipelines, roads) at existing federal ranges, not new sites (p. 3).
- FAA should "significantly accelerate its environmental reviews for new pad buildouts and site expansions" (p. 3).
- Operators should add new pads inside existing footprints (p. 3).
- Outdated range rules should be updated: legacy explosive-yield assumptions for liquid oxygen/methane rockets and 50-year-old lightning launch rules. SpaceX claims modern lightning rules could raise launch availability up to 36% in peak storm season, based on its own internal analysis (pp. 3-4).

Part II: Spaceport siting and utilization (pp. 4-7)

Siting criteria (p. 4). The most important criterion is support for frequent reentries, because full reuse means every stage, including the upper stage, returns to the launch site.

Why existing spaceports are underused (pp. 4-5).

- Three kinds of spaceports exist: federal, private exclusive-use, and state/local multi-user. SpaceX runs the only private orbital spaceport (Starbase, Texas) and is building Starbase, Louisiana (p. 4).
- Cape Canaveral is underused, not full: in 2025 SpaceX flew 101 of 109 missions there from two pads, while all other operators flew 8 missions from 7 pads. If others matched SpaceX, the Cape could host 450+ launches a year (pp. 4-5).
- The government "should not reward poor operator performance" with more land or subsidies (p. 5).
- Pads in the same complex can sit about 1,100 feet apart; SpaceX expects "multiple launches per day from each pad" (p. 5).

- Cites Space Force projections of roughly 1,200 launches a year at Cape Canaveral and 1,800 at Vandenberg by 2036, and a NASA Inspector General finding that Kennedy's shared infrastructure is Apollo-era and in poor condition (p. 5).
- Small rockets should be encouraged to move to sites like Wallops to free Florida and California capacity (p. 5).

Explosive yield and advisory bodies (p. 6).

- NASA approved a 23.1% TNT-equivalent yield for Starship at LC-39A instead of 100%, based on SpaceX's test work. FAA and NASA accept the method; the Space Force has not.
- The Common Standards Working Group and Lightning Advisory Panel are called inefficient and in need of reform.

Locations named in the RFI (p. 6). SpaceX is neutral on the four locations the RFI listed.

New locations: cut regulatory review (pp. 6-7).

- Says the Commercial Space Launch Act licensing process already protects public safety, and that NEPA review "does not make a vehicle safer" but only delays licenses (pp. 6-7).
- Says NEPA's 1-2 year timelines cannot fit the Act's 180-day licensing deadline, and notes FAA has done more than 15 environmental reviews of Starbase, Texas since 2014 (p. 7).
- Cites the Secretary's authority under 51 U.S.C. 50905(b)(2)(C) to drop other federal-law requirements (p. 7).
- **Four steps (p. 7):** (1) finalize the proposed "Waiver of Specified Statutory Requirements" without narrowing it, noting it covers license issuance, airspace closures, and leases of federal land; (2) if NEPA is not waived, create categorical exclusions for spaceport development and recurring operations; (3) have FAA, the Department of War, and NASA do one coordinated review; (4) rely on Part 420/450 safety analysis instead of site-level reviews.

> **Analysis**
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> Part II is where the filing most directly concerns a new site like Pecan Island. It argues for fewer and faster environmental reviews for "new pad buildouts and site expansions" (p. 3) and for categorical exclusions for "spaceport development" (p. 7). Categorical exclusions generally mean no environmental assessment and no public comment period for the covered actions.
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> SpaceX's waiver comments on a separate docket (FAA-2026-8614, comment 3021) are cited throughout (fn. 15). That docket may be worth reviewing alongside this one.

Part III-A: How airspace works today (pp. 8-9)

- FAA cut closure times since 2018 and now reopens airspace as quickly as three minutes after a vehicle clears, but SpaceX says those gains have hit a "local maximum" (p. 8).
- Today's hazard areas usually run "from the surface to unlimited" for the whole launch window (p. 8).
- Closures average just over two hours per launch; FAA's own concept expects under three minutes for a nominal vertical launch (p. 8).
- Windows are typically requested as 2-4 hour blocks; planning starts about 10 days ahead (p. 8).
- In 2024, Kennedy and Cape Canaveral supported 93 launches, 14 major test milestones, and 45 scrubs (p. 8).

- At 10,000 operations a year, the 10-day planning cycle would mean about 274 NOTAMs in coordination at once, "too many for pilots and dispatchers to track" (p. 9).
- Space Force plans to make 5-8 major operations per day a planned capability at its ranges (p. 9).

Part III-B: The proposed corridor model (pp. 9-13)

- Operators file mission details 48 hours ahead and get **automatic approval** if the trajectory falls inside the corridor's analyzed bounds (p. 9).
- Each corridor has two parts (p. 10): an **inner hazard volume** that moves with the rocket and is closed to aircraft where risk exceeds 1 in a million and there is no time to clear planes; and an **outer contingency volume** that stays open to aircraft and is cleared only if debris is actually generated.
- Airspace reopens automatically once vehicles clear, "ready for the next operation the same day" (p. 9).

Table 1: 12 elements of the proposed corridor definition (pp. 11-13)

Element	Key point
1. Permanently charted (p. 11)	Fixed boundaries, standard names, built into charts and playbooks.
2. Inner hazard volume (p. 11)	Moving closed zone around the vehicle; pad-area airspace closed only while active.
3. Outer contingency volume (p. 11)	Stays open to aircraft; cleared only after a debris event.
4. Just-in-time, multiple windows (p. 12)	Activated per window from real-time data; supports multiple short windows per day.
5. Full-mission scope (p. 12)	Ascent, booster return, reentry, and landing or catch.
6. Qualifying operations (p. 12)	Any licensed or government launch/reentry that shares real-time data via SDI or a tool like Cleared, regardless of payload.
7. Priority (p. 12)	Qualifying operations get priority inside the inner volume while active.
8. Reliability-based scaling (p. 12)	Zones shrink as the vehicle proves reliable; eventually treated like aircraft.
9. Periodic review (p. 13)	FAA reviews geometry with industry and shrinks corridors over time.
10. International (p. 13)	Standing agreements with foreign air navigation providers.
11. Safety criteria (p. 13)	Part 450 public safety criteria unchanged.
12. Over land and populated areas (p. 13)	"Standard mitigations" such as emergency alerting and public notification. Says corridors over land are necessary for inland spaceports and reentry.

Part III-C: FAA has designed this already (pp. 14-16)

- Says FAA adopted the CSINAS ConOps in 2020 but "little of this has been implemented" six years later; SDI is still a prototype not deployed in any air route traffic control center (pp. 14-15).
- Notes a 2024 House Appropriations report directed FAA to report by **December 31, 2026** on integrating launch tracking data into controller displays (p. 15).
- Tools to connect: SDI, Cleared, FMDS and SMART (deployed by Air Space Intelligence, with which SpaceX voluntarily shares data), and the SpORT portal (pp. 15-16).
- SpORT should **automatically approve** airspace reservations whenever a mission holds an FAA license and no conflicting reservation exists (p. 16).
- Three procedural asks: designate corridors at every site with recurring operations, accept mission details as late as 48 hours out, and allow multiple short windows per day (p. 16).
- Asks DOT to direct FAA to implement CSINAS and ARC automation **within one year**, with one accountable official and public progress reports (p. 16).

Part III-D: Answers to the RFI's corridor questions (pp. 17-21)

RFI question	SpaceX answer	Page
Prioritization	Priority should be "narrow and predictable": only in the inner volume, usually for single-digit minutes. Operators commit to short windows and set scrub decision points.	p. 17
Limiting airline impacts	Fixed charted shapes instead of per-mission NOTAMs; pre-agreed "escape corridors" (est. +7-8 min on a LaGuardia-Miami 737 flight, emergency only); move only affected flights; automated rerouting.	p. 18
Benefits	Smaller, shorter restrictions for aviation; assured access for operators; less manual work for FAA.	p. 18
Timelines	Coordinate once at designation; planning shrinks from weeks/months to days/hours.	p. 19
Who qualifies	Licensed or government operations meeting data requirements and a defined number of successful flights in that trajectory family.	p. 19
Payload type	All missions, including **test** missions, regardless of payload.	p. 19
Which spaceports	Any spaceport with recurring operations, including private sites. Names Starbase Louisiana (30/day).	pp. 19-20
Fees and governance	Opposes any corridor fees. Wants a senior DOT official accountable for implementation.	p. 20

RFI question	SpaceX answer	Page
Safety and emergencies	Part 450 unchanged; real-time debris modeling; oceanic airspace needs special attention (VHF relays, ADS-B).	p. 20
Environmental concerns	"There are no necessary or required environmental considerations"; NEPA "clearly does not apply." Sonic boom effects are already considered in licensing.	pp. 20-21
Naming	Call them "space launch and reentry corridors." Notes FAA began adding "STO" to hazard area names in Aug. 2026 after non-standard naming led to flight plans filed through hazard areas.	p. 21

Analysis

The environmental answer (pp. 20-21) is the strongest position in the filing: corridors should trigger **no** environmental review at all, because impacts are covered at the licensing stage. Combined with the push to waive or categorically exclude NEPA at the licensing stage (p. 7), the practical effect could be very little environmental review at any stage.

Including test missions in priority corridors (p. 19) is notable given that Starship is still in a test program.

The p. 21 detail about flight plans being filed through hazard areas is a concrete, citable airspace safety incident from SpaceX's own filing.

Part IV: Additional issues SpaceX raises (pp. 21-23)

Path from segregation to integration (pp. 21-22). Corridor sizes should shrink as reliability grows, using statistical reliability-growth models (Crow-AMSAA) rather than waiting for a raw count of failure-free flights. FAA should also credit existing NASA and Space Force certifications.

Reentries over land (pp. 22-23). This is the most technical section and the most relevant to communities under a return path.

- Explains FAA's three public-risk measures under Part 450: expected casualties (Ec, limit 1 in 10,000 per reentry), individual risk, and conditional expected casualties (CEc), which assumes the vehicle has already failed and must stay below 1 in 1,000 every second of flight (p. 22).
- Argues CEc is effectively impossible to meet for reentries over populated areas, and that FAA equates "demonstrated reliability" with 87,000 failure-free flights, while U.S. licensed reentries have never exceeded seven in a year (p. 22).
- Notes an FAA advisory committee (SpARC) recommended an immediate blanket waiver of the CEc rule, 14 CFR 450.101(c)(2) (p. 22).
- Proposes agreed ground tracks and **abort-safe locations on federal land** (such as military test ranges) where a failing vehicle can be steered, citing the 1982 Columbia landing at White Sands (p. 23).

- Proposes crediting **shelter-in-place alerts** sent through Wireless Emergency Alerts to people under the debris footprint, citing an analysis where debris took nearly five minutes to fall below 18,000 feet (p. 23).
- Where such alerts exist, asks FAA to raise the CEc limit to **at least 1 in 100 (a 10x increase), or eliminate it** (p. 23).

Analysis

Because full reuse means stages return to the launch site (p. 4), Starbase Louisiana would be the end point of reentry corridors. Any loosening of CEc or crediting of shelter-in-place texts would apply to whoever lives under those approach paths.

The proposal shifts part of the safety burden onto residents responding to an emergency text within minutes. Questions worth asking: alert reliability in rural areas, people outdoors (fishing, hunting, farming, marsh work), and who decides the footprint.

Element 12 of Table 1 (p. 13) offers only "standard mitigations" for corridors over populated areas, with no further detail.

Conclusion (pp. 23-24)

SpaceX says the U.S. can "far exceed" the 1,000-per-year goal while improving airspace safety, and offers further data and briefings.

Short quotes with page numbers

Quote	Page
"SpaceX anticipates conducting 10,000 launches per year itself"	p. 1
"is constructing a second facility in Starbase, Louisiana"	p. 4
"designed for approximately 30 launches and reentries per day"	p. 20
"At up to 30 launches and reentries a day, manual coordination cannot keep up."	p. 16
NEPA review "does not make a vehicle safer"	p. 7
"There are no necessary or required environmental considerations for these corridors"	p. 20
"NEPA review clearly does not apply"	p. 20
"Priority should be narrow and predictable."	p. 17
Corridors over land "are necessary to expand the scope of inland spaceports"	p. 13

Related context (outside this filing)

- Airlines for America (members include American, Delta, United, Southwest, FedEx, UPS) filed in the same docket the same day as comment FAA-2026-9736-0236, warning of serious operational impacts and asking that new spaceports be vetted against effects on existing airspace users.

- Musk's Oct 28, 2026 post that 10,000 Starship launches a year would come from Starbase Louisiana alone is a public statement, not part of this filing.
- SpaceX's comments on the proposed statutory waiver: Docket FAA-2026-8614, comment 3021 (cited in fn. 15).