

DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

Finding of No Significant Impact and Record of Decision

for

Environmental Assessment for Zipline International, Inc. Proposed

Drone Package Delivery Operations in Dallas-Fort Worth, TX

Summary

The Federal Aviation Administration (FAA) prepared the attached final Environmental Assessment (EA) to analyze the potential environmental impacts of amending the Operations Specifications (OpSpec) of Zipline International Inc. (Zipline), per its 49 United States Code (U.S.C.) Section 44807 exemption and Part 135 certificate that allow Zipline to carry the property of another for compensation or hire beyond visual line of sight (BVLOS) using its Platform 2 (P2) Unmanned Aircraft System (UAS). Zipline is seeking to amend its OpSpec to conduct unmanned aircraft (UA; also referred to as a drone) commercial package delivery operations in Dallas-Forth Worth, Texas (DFW).

Zipline is proposing to conduct operations 24 hours a day, seven days per week, including holidays, from up to 75 sites in the DFW area using its 55-pound P2 “Zip” UA. Each site would contain up to 20 individual “docks” (i.e., ground infrastructure) with charging or loading capability depending on the purpose of the site, and would serve an area with up to 400 flights per day within a 10-mile radius, with the exclusion of areas with high densities of air traffic or population.

This EA was prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA; 42 U.S.C. § 4321 et seq.), and FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.

After reviewing and analyzing available data and information on existing conditions and potential impacts, the FAA has determined that the Proposed Action would not significantly affect the quality of the human environment. Therefore, the preparation of an Environmental Impact Statement is not required, and the FAA is issuing this Finding of No Significant Impact (FONSI) and Record of Decision (ROD). The FAA has made this determination in accordance with applicable environmental laws and FAA regulations. The EA is incorporated by reference into this FONSI/ROD.

Purpose and Need

Zipline's request to amend its OpSpec to conduct drone delivery operations in DFW requires FAA review and approval. The FAA has a statutory obligation to review Zipline's request to determine whether the amendment would affect safety in air transportation or air commerce and whether the public interest requires the amendment.

The purpose of Zipline's proposal is to implement drone delivery operations in DFW, and is related to the FAA's role and responsibility to review applications for safe flight and certification under Part 135. The proposed action is needed to meet consumer demand for package deliveries in DFW as identified by Zipline, and to implement BVLOS for those drone package delivery operations.

See Section 1.3 of the EA for detailed discussion.

Proposed Action

The proposed action is the FAA's amendment of an OpSpec to allow expansion of Zipline's current area of operations for UA commercial delivery service to include the DFW metro area. Under the proposed action, Zipline would establish up to 75 site locations and construct up to a total of 500 docks with a maximum of twenty docks at a single site. Operations would occur 24 hours a day, seven days per week, including holidays. Zipline would conduct up to 400 deliveries over a 24-hour day in a 10-mile radius around each site. Approximately 95% of flights would take place during acoustic daytime (7:00 a.m. to 10:00 p.m.) and 5% of flights would take place at acoustic nighttime (10:00 p.m. to 7:00 a.m.). Docks would be placed at least 325 feet away from noise-sensitive areas within the controlled surface areas of Class B and Class D airspace. In addition, docks would be placed at least 150 feet away from noise-sensitive areas when they are outside of the controlled surface areas of Class B and Class D airspace. Zipline is projecting to establish operations in the DFW operating area under the scope of the proposed action over the course of 18 months. The exact timing and pace of dock installation is dependent on prevailing market conditions, operational feasibility, and physical installation feasibility. If, in the future, Zipline wanted to exceed their allocated site, docks, or daily flights in the operating area, additional safety and NEPA reviews would be required. Zipline's sites would be located in established commercial areas whose use is consistent with local zoning and land use requirements, such as retail stores, warehouses, laboratories, and other locations operated by customers.

See Section 2.2 of the EA for further information.

Alternatives

Alternatives analyzed in the EA include the Proposed Action and the no action alternative. Under the no action alternative, Zipline would not introduce commercial UA package delivery operations in DFW. Consumers in the areas not served by UA would be expected to continue to use personal ground transportation to retrieve small goods. This alternative does not support the stated purpose and need.

See Section 2 of the EA for further information.

Environmental Impacts

The potential environmental impacts of the Proposed Action and no action alternative were evaluated in the EA for each environmental impact category identified in FAA Order 1050.1F. Chapter 3 of the EA describes the affected environment within the project study area and identifies the following environmental impact categories that are not analyzed in detail: Air Quality and Climate, Coastal Resources; Farmlands; Hazardous Materials, Solid Waste, and Pollution Prevention; Land Use; Natural Resources and Energy Supply; Socioeconomics; Children's Environmental Health and Safety Risks; Visual Effects (Light Emission Only); and Water Resources (Wetlands, Floodplains, Surface Water, Groundwater, and Wild and Scenic Rivers). Pursuant to recent Executive Orders and Department of Transportation guidance, the EA does not analyze environmental effects related to environmental justice.

Chapter 3 also evaluates the potential environmental consequences of the Proposed Action for each of the remaining environmental impact categories and documents the finding that no significant environmental impacts would result from the Proposed Action. A summary of the documented findings for each impact category, including requisite findings with respect to relevant special purpose laws, regulations, and executive orders, is presented below.

- **Biological Resources, EA Section 3.3 and Appendix E.** Operations would occur mostly in an urban and suburban environment, typically well above the tree line and away from sensitive habitats, and given the short duration of increased ambient sound levels, the Proposed Action is not expected to significantly influence biological resources in the area. As there is no plausible route of effects on aquatic environments or taxa, the FAA has determined that the proposed action would have “**no effect**” on alligator snapping turtle, Louisiana pigtoe, Texas fawnfoot, Texas Heelsplitter, and to the proposed Texas fawnfoot’s critical habitat. Based on operations

occurring mostly in an urban environment, the altitude at which the UA flies in the en route phase, the expected low sound levels experienced by the whooping crane and golden-cheeked warbler, the short duration of increased ambient sound levels, the low probability of the whooping crane and golden-cheeked warbler occurring in the study area, and the low likelihood of a UA striking the whooping crane and golden-cheeked warbler, the FAA has determined that the proposed action “***may affect, but is not likely to adversely affect,***” the whooping crane and golden-cheeked warbler. The tricolored bat and monarch butterfly are listed as proposed endangered and threatened species respectively and are therefore not protected under the Act; however, conferencing is only necessary if it is determined a federal action is likely to jeopardize the continued existence of a proposed species. Therefore, the FAA determined that conferencing is *not necessary* for the proposed action. On July 16, 2025, the FAA submitted an informal consultation request to the USFWS in accordance with Section 7 of the ESA and requested concurrence with the FAA’s effect determination for the proposed project. On August 13, 2025, the USFWS issued a letter in response concurring with the FAA’s determination that the project, as proposed “may affect, but is not likely to adversely affect” the whooping crane and golden-cheeked warbler. The FAA has also determined that proposed action would not be expected to result in significant impacts on migratory birds, because it would not result in long-term or permanent loss of wildlife species, would not result in substantial loss, reduction, degradation, disturbance, or fragmentation of native species’ habitats or populations, and would not have adverse impacts on reproductive success rates, natural mortality rates, non-natural mortality, or ability to sustain the minimum population levels.

- **Department of Transportation Act Section 4(f), EA Section 3.4, Appendix B.** The FAA has determined that drone operations would not cause substantial impairment to Section 4(f) resources that could occur in the study area and would not be considered a *constructive use* of any Section 4(f) resource. Occasional flyovers would not result in significant noise levels at any location within the study area, and the short duration of en route flights (approximately 15 seconds) would minimize any potential for significant visual impacts. In addition, Zipline’s flight planning software is designed to increase variability in flight paths to minimize overflights of any given location; with diversification of flight paths, the frequency of overflights would decrease as the distance from a site increases. Zipline has established a direct line of communication with Texas Parks and Wildlife to discuss any concerns regarding parkland noise and will carefully coordinate any parkland delivery operations that may occur with the appropriate managing

parkland entities. Therefore, the Proposed Action would not result in significant impacts on Section 4(f) resources.

- **Historical, Architectural, Archaeological, and Cultural Resources; EA Section 3.5, Appendices F and G.** Infrastructure for the Proposed Action would consist almost entirely of pre-existing hardstand in commercially-zoned, primarily pre-disturbed areas, and would involve limited ground disturbance. Therefore, the nature of UA effects on historic properties would be limited to non-physical, reversible impacts (i.e., the introduction of audible and/or visual elements). Zipline projects up to 400 delivery flights per operating day per sitet, meaning any historic or cultural resource would experience few overflights per day, if any. Additionally, Zipline's flight planning software minimizes overflights of any specific location by varying flight paths. All takeoff and landing operations would occur at least 55 feet away from any historic properties, adhering to standoff requirements for noise-sensitive areas. Additionally, the FAA conducted a noise exposure analysis for the proposed action—as described in Section 3.6, Noise and Noise-Compatible Land Use and Appendix D—and concluded that noise levels would be below the FAA's threshold for significance, even in areas with the highest noise exposure. Based on the information available, the FAA made a finding of "*no adverse effect*" in accordance with 36 CFR Part 800, on July 3, 2025, and transmitted a letter with this finding to the Texas SHPO and local government stakeholders. The FAA received concurrence from the SHPO on July 21, 2025, that there would be *no adverse effect* on historic properties by the proposed action. Therefore, the Proposed Action would not result in significant impacts on historical, architectural, archaeological, or cultural resources.
- **Noise and Noise-Compatible Land Use, EA Section 3.6, Appendix D.** The Proposed Action is not anticipated to result in any significant changes in the overall noise environment within the affected area. Noise impacts would be significant if the action would increase noise by day-night average sound level (DNL) 1.5 decibel (dB) or more for a noise-sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe. The maximum noise exposure levels attributable to the Proposed Action are associated with site operations, where DNL 65 dB occurs within 70 feet of a site perimeter and DNL 60 dB occurs within 150 feet. However, sites would be located at least 150 feet away from noise-sensitive areas, as described in the Proposed Action. In addition, when

sites are planned to be within the controlled surface areas of Class B and Class D airspaces, the site would be placed 325 feet away from noise-sensitive areas, as described in the Proposed Action. Therefore, no significant impacts on noise and noise-compatible land use are expected under the Proposed Action.

- **Visual Effects (Visual Resources and Visual Character), EA Section 3.7.** Impacts on visual resources are expected to be less than significant. The Proposed Action would make no changes to any landforms or land uses; thus, there would be no effect on the visual character of the area, as the sites would be located in established commercial areas. Drone operations would not introduce new light emissions, and the short duration of overflights as well as the low number of overflights within any given location would minimize the potential for substantial visual impacts. Therefore, no significant impacts on visual effects are expected under the Proposed Action.

Please refer to Chapter 3 of the Final EA for a full discussion of the analysis for each environmental impact category.

Chapter 4 of the EA provides an analysis of the potential additional impacts of the Proposed Action when added to other past, present, and reasonably foreseeable actions. The FAA has determined that the Proposed Action would not result in significant reasonably foreseeable impacts in any environmental impact category.

Public Involvement and Coordination

On June 18, 2025, the FAA published the draft EA for a 30-day public comment period. The FAA received one comment during the comment period for this EA, which closed on July 18, 2025. The FAA considered all public comments when preparing the EA. Comments were received in writing at 9-FAA-Drone-Environmental@faa.gov.

See Section 1.4 and Appendix I of the EA for further information.

Mitigation

In conducting package delivery operations under the proposed action, Zipline has agreed to use the following avoidance, minimization, and mitigation measures:

- Locate sites at least 325 feet away from noise-sensitive areas in the controlled surface portions of Class B and Class D controlled airspace;
- Locate sites at least 150 feet away from noise-sensitive areas outside of the controlled surface portions of Class B and Class D controlled airspace;
- Maintain communication with Texas Parks and Wildlife to discuss any potential concerns on impacts to wildlife or habitat, including impacts to migratory birds, and on parkland noise;
- If Zipline identifies a bald eagle nest or is notified of the presence of a nest, Zipline would establish an avoidance area such that there is a 1,000 feet vertical and horizontal separation distance between the vehicle's flight path and the nest. Zipline would maintain this avoidance area until the end of the breeding season or until a qualified biologist indicates the nest has been vacated. Zipline would report monitoring and avoidance measures to Texas Parks and Wildlife and the USFWS Region 2 Migratory Bird Permit Office.
- If whooping cranes are observed using habitat in the study area in future, Zipline would coordinate with the Arlington Ecological Services Field Office of the USFWS, as well as the Texas Parks and Wildlife Department, to determine pertinent avoidance zones or any other best management practices needed to avoid adversely affecting the species.
- Report monitoring and avoidance measures to FWC and USFWS Regional Migratory Bird permit office;
- Employ best management practices to mitigate stormwater and soil erosion impacts; and
- Coordinate with other UA operators and FAA to mitigate potential impacts in locating operations or from concurrent operations in the same area.

Finding of No Significant Impact

The FAA finding is based on a comparative examination of environmental impacts for each of the alternatives studied during the environmental review process. The EA discloses the potential environmental impacts for each of the alternatives and provides a full and fair discussion of those impacts. Based on the FAA's review and analysis and consideration of comments, it has determined that

there would be no significant impacts on the natural environment or surrounding population as a result of the Proposed Action.

The FAA believes the Proposed Action best fulfills the purpose and need identified in the EA. In contrast, the no action alternative fails to meet the purpose and need identified in the EA. An FAA decision to take the required actions and approvals is consistent with its statutory mission and policies supported by the findings and conclusions reflected in the environmental documentation and this FONSI/ROD.

After careful and thorough consideration of the facts contained herein and following consideration of the environmental impacts described, the undersigned finds that the proposed Federal action is consistent with existing national environmental policies and objectives as set forth in Section 101 of NEPA and other applicable environmental requirements, and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA. As a result, an Environmental Impact Statement will not be prepared by the FAA.

Decision and Order

The FAA recognizes its responsibilities under NEPA and its own directives. Recognizing these responsibilities, the undersigned has carefully considered the FAA's goals and objectives in reviewing the environmental aspects of the Proposed Action to approve Zipline's request to conduct UA retail package delivery operations from up to 75 sites in the Dallas-Fort Worth metropolitan area. Based upon the above analysis, the FAA has determined that the Proposed Action meets the purpose and need.

The environmental review included the purpose and need to be served by the Proposed Action, alternatives to achieving them, the environmental impacts of these alternatives, and conditions to preserve and enhance the human environment. This decision is based on a comparative examination of the environmental impacts for each of these alternatives. The EA provides a fair and full discussion of the impacts of the Proposed Action. The NEPA process included appropriate consideration for avoidance and minimization of impacts, as required by NEPA and other special-purpose environmental laws, and appropriate FAA environmental orders and guidance.

The FAA has determined that environmental concerns presented by interested agencies and the public have been addressed in the EA. The FAA believes that, with respect to the Proposed Action, the NEPA requirements have been met. FAA approval of this environmental review document indicates that applicable Federal requirements for environmental review of the Proposed Action have been met.

Accordingly, under the authority delegated to me by the Administrator of the FAA, I approve and direct that agency action be taken to carry out implementation of the Proposed Action.

Issued on: _____

Joseph K. Hemler Jr
Manager, AFS-752
Emerging Technologies Division
Office of Safety Standards, Flight Standards Service

Right of Appeal

This FONSI/ROD constitutes a final agency action and a final order taken pursuant to 49 U.S.C. §§ 40101 et seq., and constitutes a final order of the FAA Administrator, which is subject to exclusive judicial review by the Courts of Appeals of the United States in accordance with the provisions of 49 U.S.C. § 46110. Any party having substantial interest in this order may apply for a review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110.