Federal Aviation Administration

Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Baton Rouge, Louisiana

June 2026

DEPARTMENT OF TRANSPORTATION | Federal Aviation Administration
Washington, D.C.

Notice of Availability, Notice of Public Comment Period, and Request for Comment on the Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Baton Rouge, LA

The Federal Aviation Administration (FAA) provides notice that a Draft Environmental Assessment (EA), prepared pursuant to the National Environmental Policy Act (NEPA) (42 United States Code §§ 4321–4355), to assess Amazon Prime Air's proposed commercial drone delivery service in Baton Rouge, LA, is available for review and comment.

Amazon Prime Air is seeking to amend its air carrier Operations Specifications (OpsSpec) and other FAA approvals necessary to expand commercial drone delivery operations in Baton Rouge, LA. The FAA's approval of the amended OpsSpec is considered a major federal action under NEPA and requires a NEPA review. The Draft EA is submitted for review pursuant to NEPA, FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, Section 4(f) of the Department of Transportation Act (49 U.S.C. § 303), and Section 106 of the National Historic Preservation Act (16 U.S.C. § 470). The Draft EA will be available for a 30-day public review beginning on June 23, 2026, and ending on July 22, 2026.

The Draft EA is available for online review at https://www.faa.gov/uas/advanced_operations/nepa_and_drones

Comments on the Draft EA may be submitted electronically to 9-faa-drone-environmental@faa.gov. Written comments may be submitted via U.S. Mail to the address below. Please ensure adequate time for receipt. All comments must be received by 5 p.m. Central time on July 22, 2026.

Federal Aviation Administration, Suite 802W
c/o AVS Environmental
800 Independence Ave SW
Washington, DC 20591

All substantive comments received will be responded to in the Final EA.

PRIVACY NOTICE: Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Responsible FAA Official:

Derek Hufty
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DEPARTAMENTO DE TRANSPORTACIÓN | Administración Federal de Aviación
Washington, D.C.

Aviso de Disponibilidad, Aviso de Período de Comentarios Públicos, y Solicitud de Comentarios sobre el Borrador de la Evaluación Ambiental para las Operaciones de Entrega de Paquetes de Amazon Prime Air en Baton Rouge LA.

La Administración Federal de Aviación (FAA, por sus siglas en inglés) notifica que el Borrador de Evaluación Ambiental (EA, por sus siglas en inglés), elaborado conforme a la Ley Nacional de Política Ambiental (NEPA, por sus siglas en inglés) (Título 42 del Código de los Estados Unidos, §§ 4321–4355), para evaluar el servicio propuesto de entrega comercial de paquetes mediante drones de Amazon Prime Air en Baton Rouge, LA, está disponible para revisión y comentarios.

Amazon Prime Air solicita enmendar sus Especificaciones de Operación (OpsSpec, por sus siglas en inglés) como transportista aéreo, así como otras aprobaciones de la FAA necesarias para expandir las operaciones de entrega comercial de paquetes mediante drones en Baton Rouge, LA. La aprobación por parte de la FAA de las OpsSpec enmendadas se considera una acción federal importante conforme a NEPA y, por ende, requiere una revisión en virtud de dicha ley. El Borrador de EA se presenta para revisión de conformidad con NEPA, la Orden 1050.1G de la FAA, Procedimientos de Implementación de la Ley Nacional de Política Ambiental, la Sección 4(f) de la Ley del Departamento de Transportación (49 U.S.C. § 303) y la Sección 106 de la Ley Nacional de Preservación Histórica (16 U.S.C. § 470). El Borrador de EA estará disponible para revisión pública durante 30 días, comenzando el 23 de junio de 2026 y terminando el 22 de julio de 2026.

El Borrador de EA está disponible para revisión en línea en:
https://www.faa.gov/uas/advanced_operations/nepa_and_drones

Puede someter sus comentarios al Borrador de EA mediante vía electrónica a: 9-faa-drone-environmental@faa.gov. También pueden someter comentarios escritos enviándolos por correo postal a la dirección que figura más abajo. Por favor, permita tiempo suficiente para su recepción. Todos los comentarios deben ser recibidos antes de las 5:00 p.m. (hora central) del 22 de julio de 2026.

Federal Aviation Administration, Suite 802W
c/o AVS Environmental
800 Independence Ave SW
Washington, DC 20591

Todos los comentarios sustantivos recibidos serán considerados y se dará respuesta en la EA Final.

AVISO DE PRIVACIDAD: Antes de incluir su dirección, número de teléfono, correo electrónico u otra información de identificación personal (PII, por sus siglas en inglés) en su comentario, tenga en cuenta que todo el texto—incluyendo el PII—podría divulgarse públicamente en cualquier momento. Aunque en su comentario puede solicitarnos que su PII no se divulgue durante la revisión pública, no podemos garantizar que podamos atender dicha solicitud.

El Borrador de EA se convierte en documento federal una vez evaluado, firmado y fechado por el funcionario responsable de la FAA.

Funcionario responsable de la FAA:

Derek Hufty
Gerente, Rama de Aviación General y Comercial (AFS-750)
División de Tecnologías Emergentes
Oficina de Estándares de Seguridad, Servicio de Normas de Vuelo de la FAA (Flight Standards Service)

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CHAPTER 1
Purpose and Need

1.1 Introduction

Amazon.com Services LLC, doing business as Amazon Prime Air (Prime Air), is seeking to amend its current Operations Specifications (OpsSpec) and other Federal Aviation Administration (FAA) authorizations needed to integrate the MK30 drone and commence commercial drone package delivery operations from a new Prime Air Drone Delivery Center (PADDC) located in the Baton Rouge, LA area.

This Draft Environmental Assessment (EA) is being prepared by the FAA to evaluate the potential environmental impacts that may result from the FAA's approval of the Proposed Action, and the amendment of Prime Air's OpsSpec to grant airspace access to the MK30 drone in the proposed operating areas. For purposes of this Draft EA, the MK30 drone operating area serves as the Study Area and is further defined in Chapter 2.

The issuance or amendment of OpsSpec is considered a major federal action subject to environmental review requirements. The FAA has prepared this Draft EA pursuant to the National Environmental Policy Act of 1969 (NEPA). Under NEPA, federal agencies are required to consider the environmental effects of proposed federal actions and disclose to decision-makers and the public a clear and accurate description of the potential environmental impacts of proposed major federal actions. Additionally, under NEPA, federal agencies are required to consider the environmental effects of a proposed action, reasonable alternatives to the proposed action, and a no action alternative (assessing the potential environmental effects of not implementing the proposed action). The FAA has established a process to ensure compliance with the provisions of NEPA through FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, and the FAA Order 1050.1 Desk Reference.

1.2 Proposed Operations

The 78-pound (lb.), MK30 drone carries packages weighing up to 5 lbs. and has a maximum takeoff weight of approximately 83.2 lbs. Prime Air proposes to operate up to 1,000 MK30 drone delivery flights per operating day at the PADDC over the course of 365 operating days per year, resulting in roughly 365,000 annual delivery operations. Commercial delivery operations from the PADDC would occur between 6 a.m. and 10:30 p.m., up to seven days per week, with up to 100 of the 1,000 daily delivery flights (10%) expected to occur during the period from 6 a.m. to 7 a.m. and 10 p.m. to 10:30 p.m. The MK30 drone's proposed operating range is 7.5 miles (mi) from the PADDC, with a potential operating area of 174 square (sq) mi.

The general location of the proposed PADDC is depicted in **Figure 1-1**. The PADDC facility would be located on the same property as and adjacent to an existing Amazon warehouse building with office space, a ground control station, an aircraft maintenance area, a battery storage area, paved departure and arrival pads, and perimeter fencing. All drone operations would originate from and terminate at:

- **BTR1** – Located at 9001 Cortana Place, Baton Rouge, LA, the proposed BTR1 PADDC site is zoned M-1 Industrial[1] and is located between the Blues Highway and Oak Vill Boulevard, as shown in **Figure 1-2**. The properties adjacent to the proposed BTR1 PADDC are a mix of privately-owned commercial, industrial, and residential. The closest residential neighborhood is approximately 1,300 feet (ft) southeast of the site.

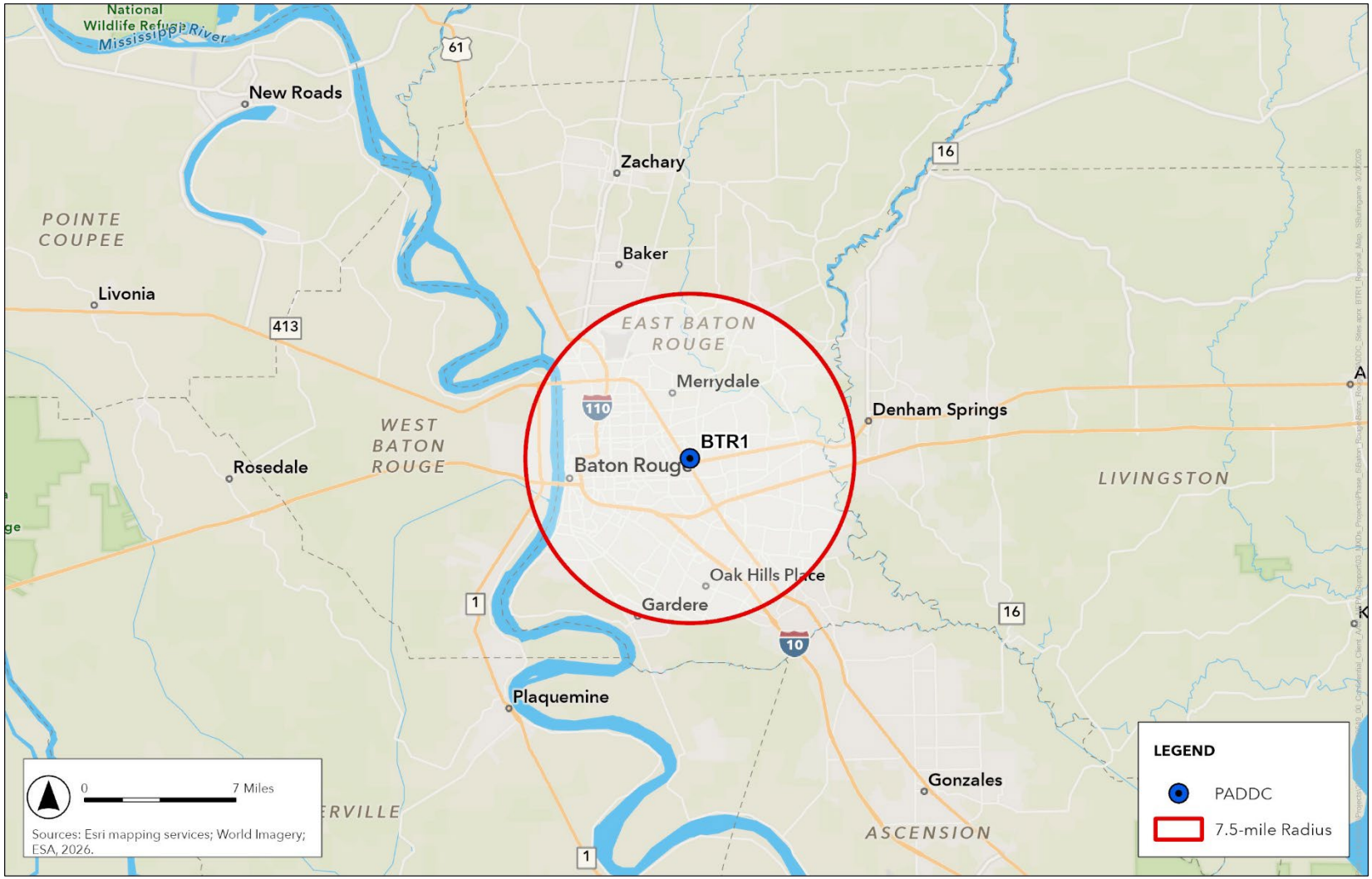
1.3 FAA Role and Federal Action

The FAA has a statutory obligation to review Prime Air's request to amend the OpsSpec and determine whether the amendment would affect safety in air transportation or air commerce, and to determine whether the public interest requires the amendment. In general, Congress has charged the FAA with the safety of air commerce in the United States.[2]

In addition, the FAA has specific statutory and regulatory obligations related to its issuance of a Part 135 certificate and the related OpsSpec. The FAA is required to issue an operating certificate to an air carrier when it "finds, after investigation, that the person properly and adequately is equipped and able to operate safely under this part and regulations and standards prescribed under this part."[3] An operating certificate also specifies "terms necessary to ensure safety in air transportation; and (2) … the places to and from which, and the airways of the United States over which, a person may operate as an air carrier."[4] Also included in air carrier certificates is a stipulation that the air carrier's operations must be conducted in accordance with the provisions and limitations specified in the OpsSpec.[5]

The regulations also specify that a Part 135 certificate holder may not operate in a geographical area unless its OpsSpec specifically authorizes the certificate holder to operate in that area.[6] The regulations implementing Section 44705 specify that an air carrier's approved OpsSpec must include, among other things, "authorization and limitations for routes and areas of operations."[7] An air carrier's OpsSpec may be amended at the request of an operator if the FAA "determines that safety in air commerce and the public interest allows the amendment."[8] After making this determination, the FAA must take an action on the OpsSpec amendment.

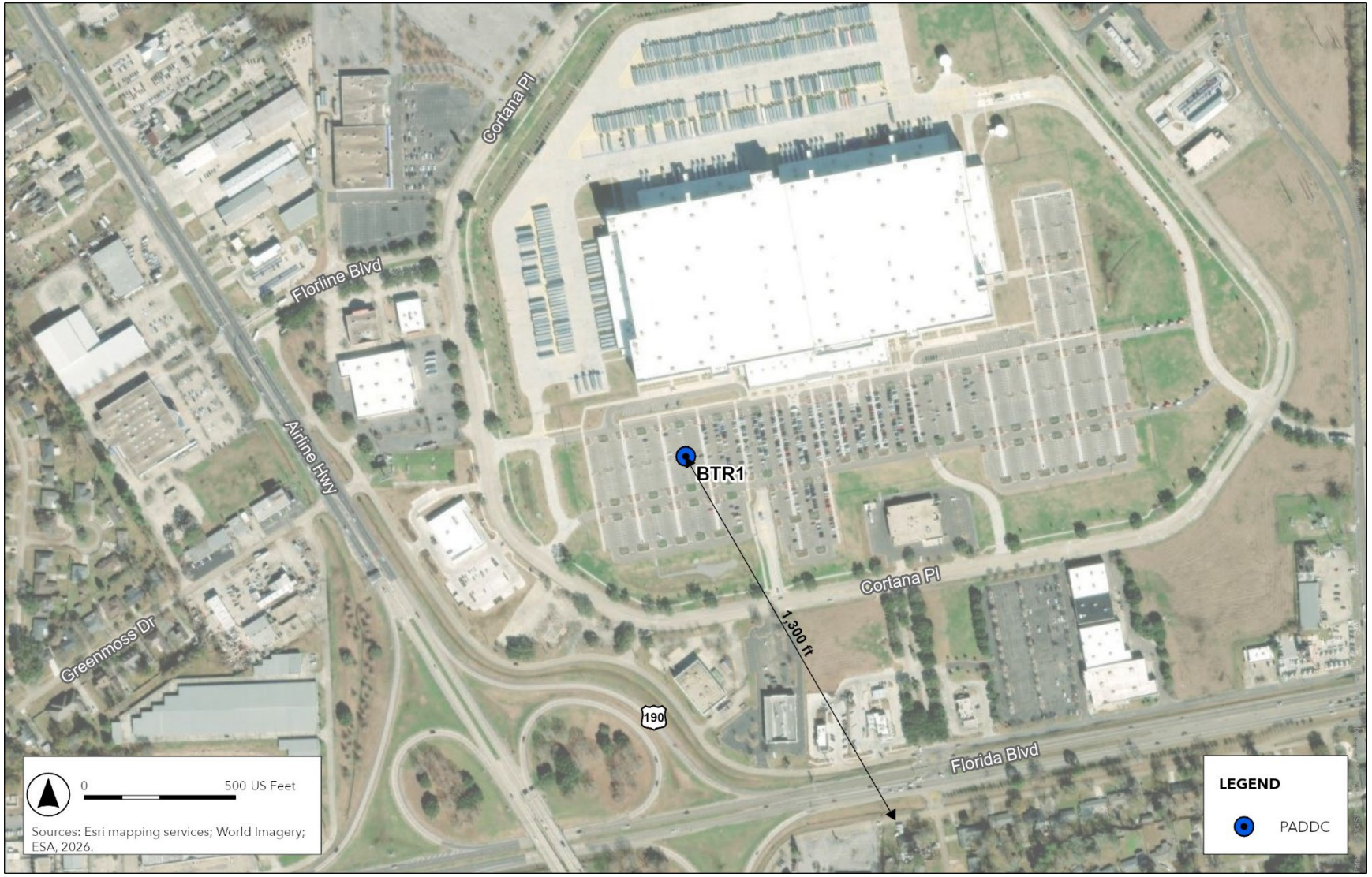
1 M-1 Industrial Zone - https://cms4files1.revize.com/hazelparkmi/52manufacturing.updated2018.pdf.
2 49 U.S.C. § 40104.
3 49 U.S.C. § 44705.
4 Id.
5 14 CFR § 119.5 (g), (l).
6 14 CFR § 119.5(j).
7 14 CFR § 119.49(a)(6).
8 14 CFR § 119.51(a); see also 49 U.S.C. § 44709.



Source: ESA, 2026; World Imagery; Esri Mapping Services.

Figure 1-1

Prime Air's Proposed BTR1 PADDC Location in Baton Rouge, LA



Source: ESA, 2026; World Imagery; Esri Mapping Services.

Figure 1-2
Close-Up View of the BTR1 PADDC

1.4 Purpose and Need

The **purpose** of Prime Air's request is to begin commercial drone delivery service in Baton Rouge, LA, which, in its business judgment, Prime Air has determined is an appropriate market for expanded commercial delivery operations. The requested OpsSpec amendments are **needed** so that Prime Air can begin MK30 drone delivery operations from its proposed PADDC location. The approval will offer Prime Air an opportunity to further assess the viability of commercial drone delivery options under real world conditions and demonstrate its ability to operate safely while meeting its compliance obligations. Furthermore, it could assist Prime Air in gauging the public demand for commercial drone delivery services and provide an opportunity to assess community response to commercial delivery operations in this area.

1.5 Public Involvement

The FAA provided a Notice of Availability (NOA) of the Draft EA on June 23, 2026, to local interest groups, local government officials, public park authorities, and the State Historic Preservation Office (SHPO), and Federally Recognized Indian Tribes and Tribal Historic Preservation Offices (THPOs). A complete NOA distribution list and documentation of Prime Air's overall public outreach efforts can be found in **Appendix A**. On the same date, the FAA made the Draft EA available to the general public on the FAA website.

English- and Spanish-language copies of the NOA can be found in **Appendix A**. The NOA provides information about the Proposed Action and requested review and comments on the Draft EA, which will be available on the FAA website for a 30-day comment period (June 23, 2026, to July 22, 2026). Interested parties are invited to submit comments on any environmental concerns relating to the Proposed Action to a specifically assigned email address. All submitted public comments and associated FAA responses will be included in **Appendix F**.

CHAPTER 2
Proposed Action and Alternatives

In accordance with the guidance outlined in Section 102 of NEPA (42 U.S.C. § 4332), the FAA has not identified any unresolved conflicts concerning alternative uses of available resources associated with Prime Air's proposal. Therefore, this Draft EA only considers the No Action and the Proposed Action alternatives.

2.1 No Action Alternative

The FAA considered the No Action alternative and the Proposed Action in its analysis. Thus, the No Action alternative serves as a baseline against which to compare the impacts of the Proposed Action. Under the No Action alternative, the FAA would not issue the approvals necessary (e.g., the OpsSpec amendment) and Prime Air would not be authorized to conduct commercial drone package delivery flights from the proposed PADDC in the Baton Rouge, LA area. This alternative does not support the stated purpose and need.

2.2 Proposed Action

The FAA would amend Prime Air's OpsSpec to enable commercial drone package deliveries in new locations. Accordingly, Prime Air has requested that the FAA approve its OpsSpec amendment so that it can begin drone commercial delivery operations in this new operating area (Baton Rouge, LA). The B050 OpsSpec, Authorized Areas of En Route Operations, Limitations, and Provisions, includes a reference section titled Limitations, Provisions, and Special Requirements. The FAA's approval of this OpsSpec amendment—including the paragraph in the B050 OpsSpec's reference section with descriptive language about the operating area boundaries, including the specific locations, and operational profile proposed in Prime Air's request—is the proposed federal action for this Draft EA. The B050 OpsSpec will restrict Prime Air to this location; any future expansion beyond the authorization and limitations for the area of operations described in the B050 OpsSpec may require additional OpsSpec amendments from the FAA, and may be subject to appropriate NEPA review, as necessary.

2.2.1 Description of Proposed Operations

As described in **Section 1.2**, Prime Air anticipates operating up to 1,000 delivery flights per operating day, up to 7 days per week, from the PADDC. These operational levels would result in a projected total of approximately 365 operating days and 365,000 delivery operations per year, based on the scope of the Proposed Action. The operations would occur between 6 a.m. and 10:30 p.m., with 100 of the 1,000 daily delivery operations (10%) occurring during the period from 6 a.m. to 7 a.m. and 10 p.m. to 10:30 p.m. and are expected to be distributed evenly across the operating area. The MK30 drone's operating range is 7.5 mi from the PADDC, with a potential operating area of 174 sq mi. The MK30 drone departure and

arrival paths from and to the PADDC would generally correspond to the geographical location of the package delivery address.

The proposed operating area for the BTR1 PADDC, which also serves as the Study Area for the Draft EA, is depicted in **Figure 2-1**.

2.2.2 Drone Specifications

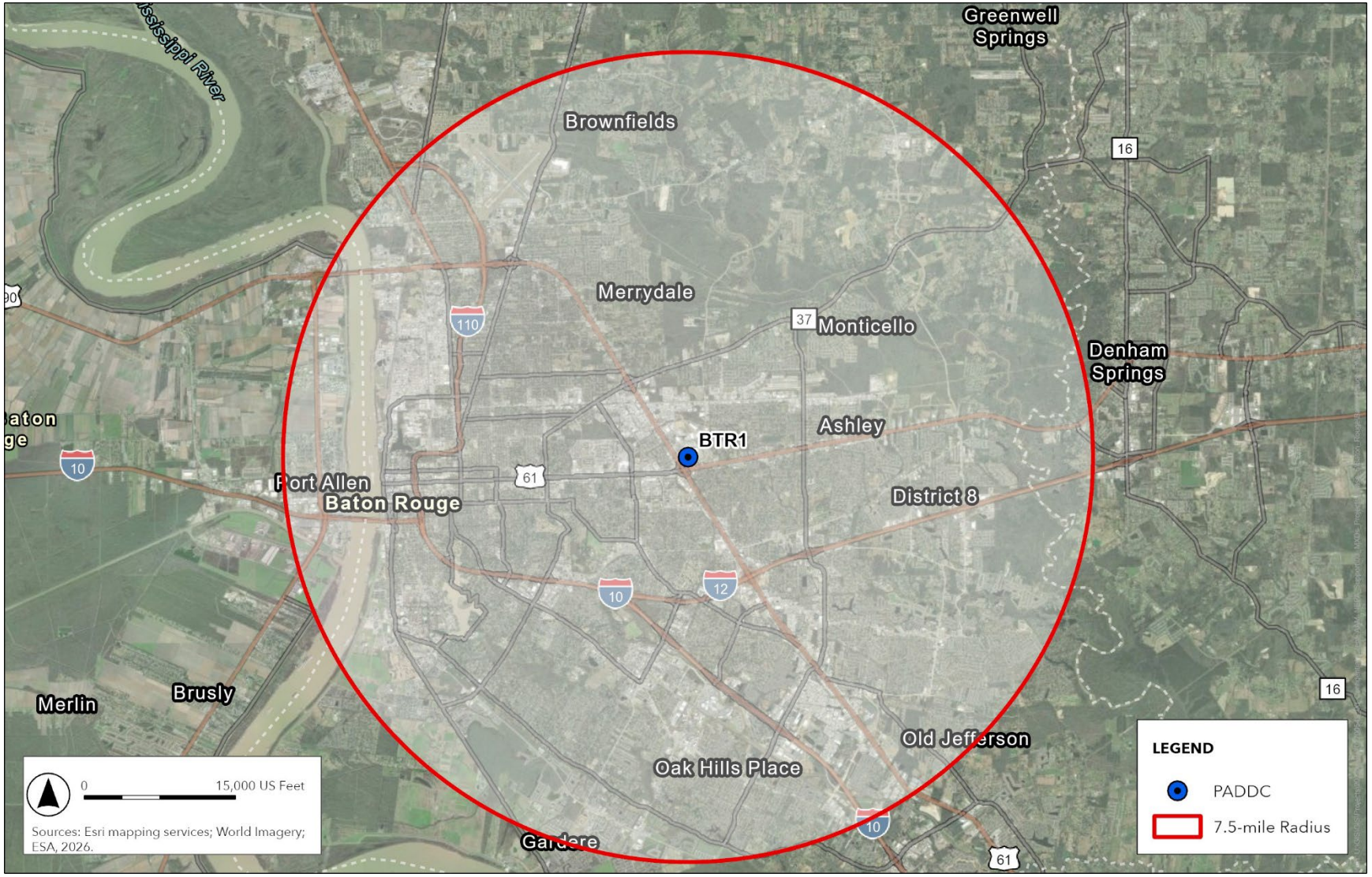
As shown in **Figure 2-2**, the MK30 drone is an electric powered drone that has a vertical take-off and landing, and transitions to wing-borne flight using wing lift during *en route* flight. The MK30 drone systems include hardware and software designed for safety and efficiency. The airframe is composed of staggered wings; the propulsion system includes a rechargeable lithium-ion battery and six motors that include propellers designed for noise reduction; the package delivery system contains the package in a two-door interior receptacle; and a camera and avionics system that has redundancy for critical systems. The MK30 drone weighs approximately 78 lbs. and has a maximum takeoff weight of 83.2 lbs., which includes a maximum payload of 5 lbs. It has a maximum operating range of 7.5 mi and can fly up to 400 ft above ground level (AGL) at a maximum cruise speed of 73 mph (64 knots) during horizontal flight.

2.2.3 Flight Operations

As shown in **Figure 2-3**, a typical flight profile can be broken into the following general flight phases: launch, *en route* outbound, delivery, *en route* inbound, and landing. After launch, Prime Air's MK30 drone would rise to an altitude of less than 400 ft AGL and follow a predefined route to its delivery site.[9] Drones would typically fly *en route* at between approximately 180 and 377 ft AGL, except when descending to drop a package. Packages would be carried internally in the drone's fuselage. When making a delivery, the drone descends, opens a set of payload doors, and drops the package to the ground from approximately 13 ft AGL. Prime Air restricts items deliverable by drone to those which can safely be dropped from this height. Prime Air's MK30 drone would not touch the ground in any place other than the PADDC (except during safe contingent landings) and will remain airborne throughout the operation including the delivery stage.[10] After the package is dropped, the MK30 drone climbs vertically and follows its predefined route back to the PADDC at its assigned altitude.

[9] Prime Air may modify operations, if warranted, to avoid or minimize any negative impacts.

[10] The MK30 drone is built with multiple redundant safety features and "detect and avoid" technology. The drone is designed to handle contingencies and will react accordingly without operator input.

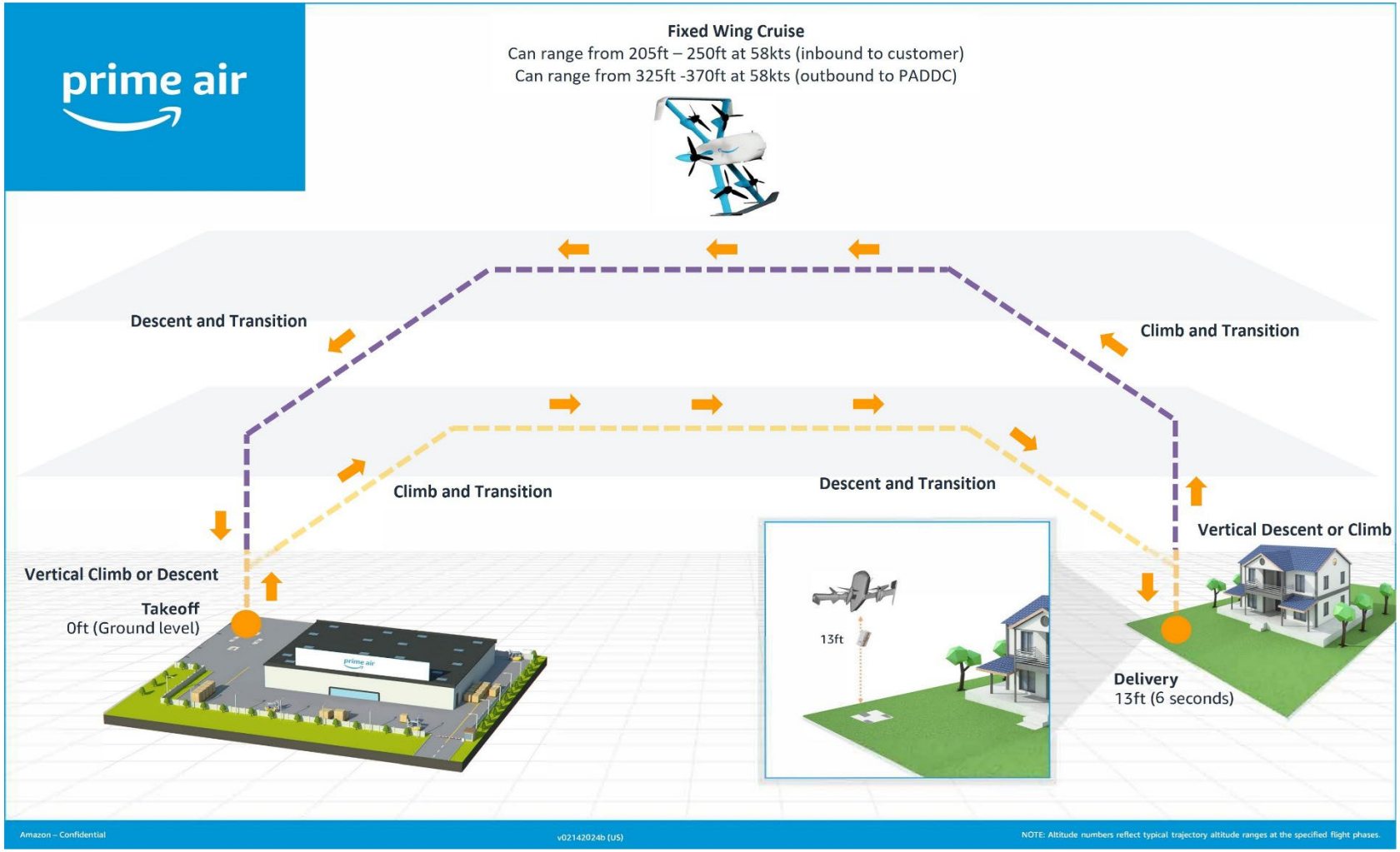


Source: ESA, 2026; World Imagery; Esri Mapping Services.

Figure 2-1
BTR1 PADDC Drone Operation Study Area

Source: Amazon Prime Air, 2023.

Figure 2-2
MK30 Drone



Source: Amazon Prime Air, 2025.

Figure 2-3
MK30 Drone Flight Profile

CHAPTER 3
Affected Environment and Environmental Consequences

3.1 Introduction

This chapter provides a description of the affected environment and potential environmental consequences for the environmental impact categories that have the potential to be affected by the No Action and Proposed Action alternatives, as required by FAA Order 1050.1G, for the environmental impact categories listed below.

- Aviation emissions and air quality
- Biological resources (including fish, wildlife, and plants)
- Coastal resources
- Department of Transportation Act, Section 303 (referred to as "Section 4(f)") and Land and Water Conservation Fund (referred to as "Section 6(f)")
- Farmlands
- Hazardous materials, solid waste, and pollution prevention
- Historical, architectural, archaeological, and cultural resources
- Land use
- Natural resources and energy supply
- Noise and noise-compatible land use
- Socioeconomics and children's health and safety risks
- Visual effects (including light emissions)
- Water resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)

The study area evaluated for potential impacts is defined as Prime Air's proposed operating area shown in **Figure 2-1**. The level of detail provided in this chapter is commensurate with the importance of the potential impacts. EAs are intended to be concise documents that focus on aspects of the human environment that may be affected by the Proposed Action.

3.2 Environmental Impact Categories Not Analyzed in Detail

This Draft EA did not analyze potential impacts on the following environmental impact categories in detail because the Proposed Action would not affect the resources included in the category (see FAA Order 1050.1G). Furthermore, these impact categories were not analyzed in detail for potentially "reasonably foreseeable" effects. Under FAA Order 1050.1G, "reasonably foreseeable" means sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision. Since these impact categories are unaffected by the Proposed Action, they would not contribute to reasonably foreseeable effects that could occur when combined with the introduction of other drones or aviation activity.

- **Aviation Emissions and Air Quality**: The MK30 drone is battery-powered and does not generate emissions that could result in air quality impacts. Electricity consumed for battery charging at the PADDC would be minimal. The electricity consumed for the Proposed Action would come from the power grid. The proposed drone operating area is located in the Baton Rouge metropolitan region, encompassing multiple cities and towns across East Baton Rouge, Livingston, and West Baton Rouge Parishes. All three parishes have been classified by the US Environmental Protection Agency as maintenance areas for ozone. However, the minimal emissions associated with charging the drone batteries are unlikely to contribute to any exceedance of National Ambient Air Quality Standards.
- **Biological Resources (Fish and Plants)**: The Proposed Action would not result in impacts to fish and plant species as the action is launched from developed/industrial areas, transported by drone, and delivered to residential houses and communities.
- **Coastal Resources**: The Proposed Action would not directly affect any shorelines, or change the use of shoreline zones, or be inconsistent with any National Oceanic and Atmospheric Administration–approved state Coastal Zone Management Plan, as there are no shorelines in the proposed area of operations.
- **Farmlands**: The Proposed Action would not involve the development or disturbance of any land, regardless of use, nor would it have the potential to convert any farmland to non-agricultural uses. The Proposed Action would not affect designated prime or unique farmlands.
- **Hazardous Materials, Solid Waste, and Pollution Prevention**: The Proposed Action would not result in any construction, development, or any physical disturbances of the ground. Therefore, the potential for impacts related to hazardous materials, pollution prevention, and solid waste is not anticipated. The drones are made of common aircraft-related materials, such as steel, aluminum, and composite materials, such as plastic. Drone/battery disposal would be properly managed at the end of its operating life in accordance with applicable 14 CFR Part 10, *Disposition of life-limited aircraft parts*, and any hazardous materials would be disposed of in accordance with all applicable federal, tribal, state, and local laws, including 40 CFR Part 273, *Standards for Universal Waste Management*.
- **Land Use**: The Proposed Action would not involve any changes to existing, planned, or future land uses within the area of operations. Prime Air would use existing facilities to conduct its MK30 drone operations. The PADDC must conform with all applicable local or state land use ordinances and zoning requirements, as described in **Section 1.2**.

- **Natural Resources and Energy Supply**: The Proposed Action would not require the need for unusual amounts of natural resources and materials, or those in scarce supply. The MK30 drone is powered by a rechargeable battery which does not consume fossil fuel (e.g., gasoline or aviation fuel) resources. The battery is charged by an electric charger which can leverage the local grid to charge the batteries. The MK30 drone would be used to replace personal vehicle trips to stores for urgently needed items; thus, the MK30 drone is expected to reduce consumption of fossil fuel resources.
- **Socioeconomics and Children's Health and Safety Risks**: The Proposed Action would not involve acquisition of real estate, relocation of residents or community businesses, disruption of local traffic patterns, loss in community tax base, or changes to the fabric of the community. Executive Order (EO) 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, requires federal agencies to ensure that children do not suffer disproportionately from environmental or safety risks. The proposed action would not introduce products or substances a child would be likely to come into contact with, ingest, use, or be exposed to, and would not result in environmental health and safety risks that could disproportionately affect children. It is not anticipated that the Proposed Action would pose a greater health and safety risk to children than package delivery by other means (truck, mail, personal automobile, etc.).
- **Visual Effects (Light Emissions Only)**: Although a portion of the drone operations could occur during nighttime hours, the Proposed Action is not expected to result in significant light emission impacts because the drones are equipped with only the minimal lighting required by the FAA for any aircraft conducting night operations. The drones are not equipped with concentrated-beam type "landing lights".[11]
- **Water Resources (Wetlands, Floodplains, Surface Water, Groundwater, Wild and Scenic Rivers)**: The Proposed Action would not result in any further construction of facilities and does not include any new facilities in areas identified as flood hazard areas according to the 1% annual chance (100-year) floodplain (non-critical actions) and 0.2% annual chance (500-year) floodplain (critical actions) that are currently used to determine the floodplain impacts for the Proposed Action.[12] The Proposed Action would not result in any changes to existing discharges to water bodies, create new discharge that would result in impacts to surface waters, or modify any water body. The Proposed Action does not involve land acquisition or ground disturbing activities that would withdraw groundwater from underground aquifers or reduce infiltration or recharge to ground water resources through the introduction of new impervious surfaces. The Proposed Action would not affect any river segments in either the Wild and Scenic River System (WSRS) or the Nationwide Rivers Inventory (NRI) as there are no WSRS or NRI river segments within the proposed operating area.

3.3 Biological Resources (Wildlife)

3.3.1 Definition of Resource and Regulatory Setting

Biological resources include plant and animal species and their habitats, including special-status species (federally listed or state-listed threatened or endangered species, species proposed for listing, species that are candidates for federal listing, marine mammals, and migratory birds) and environmentally sensitive or

[11] The FAA defines nighttime between the hours 10 p.m. and 7 a.m.

[12] Executive Order 14030, *Climate-Related Financial Risk*, May 2021.

critical habitats. In addition to their intrinsic values, biological resources provide aesthetic, recreational, and economic benefits to society.

3.3.1.1 Threatened and Endangered Species

The Endangered Species Act (ESA) of 1973 [16 U.S.C. § 1531 et seq.] requires the evaluation of all federal actions to determine whether a proposed action is likely to jeopardize any proposed, threatened, or endangered species or proposed or designated critical habitat. Critical habitat includes areas that will contribute to the recovery or survival of a listed species. Federal agencies are responsible for determining if an action *may affect* listed species, which determines whether formal or informal consultation with the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service (NMFS) is needed. If the FAA determines that the action may affect listed species, consultation with the USFWS must be initiated. Conversely, if the FAA determines the action would have *no effect* on listed species or critical habitat, consultation is not required.

Impacts considered significant to federally listed threatened and endangered species would occur when the USFWS or NMFS determines that the proposed action would be likely to jeopardize the continued existence of a federally listed threatened or endangered species or would be likely to result in the destruction or adverse modification of federally designated critical habitat. An action need not pose a threat of extinction to federally listed species to meet the NEPA standard of significance. Lesser impacts, including impacts on non-listed or special-status species, could also constitute a significant impact.

3.3.1.2 Migratory Birds

The Migratory Bird Treaty Act (16 U.S.C. §§ 703–712) protects migratory birds, including their nests, eggs, and parts, from possession, sale, purchase, barter, transport, import, export, and take. The USFWS is the federal agency responsible for the management of migratory birds as they spend time in habitats of the U.S. For purposes of the Migratory Bird Treaty Act, "*take*" is defined as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect" (50 CFR § 10.12). The Migratory Bird Treaty Act applies to migratory birds identified in 50 CFR § 10.13 (defined hereafter as "migratory birds").

3.3.1.3 Bald and Golden Eagles

The Bald and Golden Eagle Protection Act prohibits anyone from "taking" a Bald or Golden Eagle, including their parts, nests, or eggs, without a permit issued by the USFWS. Implementing regulations (50 CFR § 22), and USFWS guidelines as published in the National Bald Eagle Management Guidelines, provide for additional protections against "*disturbances*." Like take, "*disturb*" means to agitate or bother a Bald or Golden Eagle to a degree that causes, or is likely to cause, injury to an Eagle or causes either a decrease in its productivity or nest abandonment due to a substantial interference with breeding, feeding, or sheltering. A permitting process provides limited exceptions to the Bald and Golden Eagle Protection Act's prohibitions. The USFWS has issued regulations for the permitting process in 50 CFR Part 22, which include permits for the incidental take of Bald Eagles. Such permits are only needed when avoidance of incidental take is not possible. According to the USFWS National Bald Eagle Management Guideline, to avoid Bald Eagle disturbance resulting from new or intermittent activities, the implementation of conservation measures to avoid operating aircraft within 1,000 ft of a nest during the

breeding season should be implemented.[13] However, a Bald Eagle Disturbance Take General Permit may be offered if disturbance (range of 330 to 1,000 ft) to an in-use eagle nest is unavoidable.[14]

3.3.2 Affected Environment

This section describes the existing biological environment of the operating areas. The operating area spans portions of two Level III ecoregions, Mississippi Alluvial Plains (73) and Mississippi Valley Loess Plains (74), and four Level IV ecoregions. It is dominated by the Mississippi Valley Loess Plains ecoregion, stretching from near the Ohio River in western Kentucky to Louisiana. It consists primarily of irregular plains, some gently rolling hills, and near the Mississippi River, bluffs. Thick loess is one of the distinguishing characteristics. The bluff hills in the western portion contain soils that are deep, steep, silty, and erosive. Flatter topography is found to the east, and streams tend to have less gradient and more silty substrates. Oak-hickory and oak-hickory-pine forest were the natural vegetation.[15] [16] Level IV ecoregions within the Action Area are described further below.

Southern Backswamps (73m)

The Southern Backswamps ecoregion represents the smallest of the four Level IV ecoregions, situated along the far western boundary of the Action Area in West Baton Rouge Parish. This region occupies the western bank of the Mississippi River and is characterized by flat plains interspersed with depressions that contain ponded wetlands, swamps, and lakes. Additionally, the area includes low-gradient streams with silty substrates.

Southern Holocene Meander Belts (73k)

The Southern Holocene Meander Belts ecoregion curves around the Mississippi River within the Action Area in West and East Baton Rouge Parishes. It is defined by flat plains and meandering river belts that include levees, point bars, oxbows, and abandoned channels. The landscape features both large rivers and smaller, often channelized, low-gradient streams.

Inland Swamps (73n)

The Inland Swamps ecoregion lies along the southern edge of the Action Area in East Baton Rouge Parish. This region features a flat alluvial plain that transitions into a deltaic landscape, characterized by backswamps, bayous, distributary ridges, and natural levees. The area contains extensive wetlands, as well as low-gradient and channelized streams.

Baton Rouge Terrace (74d)

The Baton Rouge Terrace is the predominant Level IV ecoregion within the Action Area in East Baton Rouge and Livingston Parishes. This ecoregion features a flat coastal plain that is deeply dissected along

[13] National Bald Eagle Management Guidelines, US Fish and Wildlife Service, May 2007.

[14] Department of the Interior, USFWS, Federal Register, Vol. 89, No 29 Rules and Regulations, 50 CFR Parts 13 and 22. Available at: https://www.endangeredspecieslawandpolicy.com/assets/htmldocuments/NewBlogs/EndangeredSpecies/2024-02182.pdf, accessed April 2024.

[15] Daigle, J.J., Griffith, G.E., Omernik, J.M., Faulkner, P.L., McCulloh, R.P., Handley, L.R., Smith, L.M., and Chapman, S.S., 2006, Ecoregions of Louisiana (color poster with map, descriptive text, summary tables, and photographs): Reston, Virginia, U.S. Geological Survey (map scale 1:1,000,000).

[16] Primary Distinguishing Characteristics of Level III Ecoregions of the Continental United States. Available at: ftp://ftp.epa.gov/wed/ecoregions/us/. Accessed December 2025.

its eastern and southern edges by partially filled valleys. These valleys contain wetlands and low-gradient streams with silt and sand bottoms.

3.3.2.1 Federally Listed Species

The potential for impacts to federally listed species was assessed using the USFWS Information for Planning and Consultation (IPaC) map tool and resource. The Action Area covered the entire operating area, as outlined in red in **Figure 2-1**. The USFWS official species list, as well as the Louisiana D-Keys, was obtained through IPaC, and is included with this EA (accessed February 2026, see **Appendix B**).

Based on the official species list, there are 7 federally listed endangered, threatened, proposed endangered species, proposed threatened species, and non-essential, experimental population species that have the potential to occur within the Action Area. These species are included in **Table 3-1**. No Critical Habitat (CH) for any species is present or proposed within the Action Area. Bald Eagles are not included within **Table 3-1**; however, they are addressed in the Migratory Birds section.

TABLE 3-1
IPAC RESULTS

Species	Common Name	Species Name	Federal Status	Critical Habitat
Mammals	West Indian Manatee	*Trichechus manatus*	Threatened	N
	Tricolored bat	*Perimyotis subflavus*	Proposed Endangered	N
Reptiles	Alligator Snapping Turtle	*Macrochelys temminckii*	Proposed Threatened	N
Fishes	Gulf sturgeon	*Acipenser oxyrinchus (=oxyrhynchus) desotoi*	Threatened	N
	Pallid sturgeon	*Scaphirhynchus albus*	Endangered	N
Clams	Inflated heelsplitter	*Potamilus inflatus*	Threatened	N
Insects	Monarch butterfly	*Danaus plexippus*	Proposed Threatened	N

Source: USFWS IPaC, accessed February 2026.

Based on the IPaC review, there are two mammals, one reptile species, two fish species, one clam species, and one insect species, identified on the official species list. Descriptions of the species, their habitats, and likelihood of occurring within the Action Area are provided in the paragraphs below.

A total of two mammalian species were identified by the IPaC report as likely to occur in the Action Area. The IPaC reported the West Indian manatee (*Trichechus manatus*) with potential presence within the Action Area. They are known to regularly occur in Lakes Pontchartrain and Maurepas and their associated coastal waters and streams. Manatees may also infrequently be observed in the Mississippi River and coastal areas of southwestern Louisiana.[17]

The tricolored bat (*Perimyotis subflavus*) is a proposed candidate for listing under the jurisdiction of USFWS. As of September 14, 2022, USFWS proposed to list the tricolored bat as an endangered species

[17] U.S. Department of the Interior, USFW. 2018. ESA Concurrence Request for Recreational Use Restoration Plan Projects, Deepwater Horizon NRDAR Louisiana Trustee Implementation Group. Available online: https://www.fws.gov/doiddata/dwh-ar-documents/1408/DWH-ARZ004471.pdf. Accessed December 2025.

under the ESA. Designated critical habitat is not proposed for the tricolored bat at this time**.** Tricolored bats occur in forested habitats and are known to roost in tree foliage, cavities, and occasionally in manmade structures. They forage in woodlands, riparian corridors, wetlands, and agricultural areas where small flying insects are abundant.[18] They hibernate in caves and abandoned mines, though these features are absent in the Action Area. Urban and suburban development, fragmented forest patches, and riparian corridors within Eastern and Western Baton Rouge Parish provide limited potential habitat. Due to the nature of the Proposed Action, there is potential for bat species to be impacted by drones.

The alligator snapping turtle (*Macrochelys temminckii*), was identified by the IPaC report as likely to occur in the Action Area. The alligator snapping turtle occurs in swampy habitats associated with nearby rivers, but is most commonly found in large rivers, canals, lakes, and oxbow waters. Nesting typically occurs in sandy or silty soils along riverbanks, levees, or other elevated areas near water.[19] This species is currently proposed for listing as threatened.

Two fish species were identified by the IPaC report as likely to occur in the Action Area. The gulf sturgeon (*Acipenser oxyrinchus desotoi*) is a federally threatened, anadromous species that occurs in the lower Mississippi River near Baton Rouge primarily as a migratory and seasonal holding area, rather than a primary spawning reach. Suitable habitat consists of deep river channels, areas with strong currents, and coarse or sandy substrates typical of large alluvial rivers such as the Mississippi River.[20] Final critical habitat exists for the gulf sturgeon; however, the critical habitat does not overlap the Action Area.

The pallid sturgeon (*Scaphirhynchus albus*) is a federally endangered freshwater fish that is largely restricted to the Mississippi River and the Atchafalaya River in Louisiana. Suitable habitat includes large, deep, highly turbid river channels with strong currents and firm sand or gravel substrates.[21] The lower Mississippi River functions as a migration, foraging, and holding habitat for the species.

IPaC identified the inflated heelsplitter (*Potamilus inflatus*) as likely to occur in the Action Area. The inflated heelsplitter is a federally threatened freshwater mussel that occurs in southeastern Louisiana. Its only known population in the state is found in the Amite River, east of Baton Rouge. The species inhabits flowing riverine environments with soft, stable substrates and are associated with slow to moderate currents.[22]

The IPaC report identified one insect species as potentially present within the Action Area: the monarch butterfly (*Danaus plexippus plexippus*). The monarch butterfly is currently listed as a proposed threatened species under the Endangered Species Act and is under the jurisdiction of the USFWS. The species occurs

[18] Tricolored bat. U.S. Fish and Wildlife Service. Available online: https://www.fws.gov/species/tricolored-bat-perimyotis-subflavus. Accessed March 2026.

[19] Rare Animals of Louisiana. Alligator Snapping Turtle. 1996. Louisiana Department of Wildlife and Fisheries. Available online: https://www.wlf.louisiana.gov/assets/Resources/Publications/Rare_Animal_Species_Fact_Sheets/Reptiles/alligator_snapping_turtle_fact_sheet.pdf. Accessed March 2026.

[20] Gulf Sturgeon. 2025. NOAA Fisheries. Available online: https://www.fisheries.noaa.gov/species/gulf-sturgeon. Accessed March 2026.

[21] Rare Animals of Louisiana. Pallid Sturgeon. Louisiana Department of Wildlife and Fisheries. Available online: https://www.wlf.louisiana.gov/assets/Resources/Publications/Rare_Animal_Species_Fact_Sheets/Fish/pallid_sturgeon_fact_sheet.pdf. Accessed March 2026.

[22] Alabama Heelsplitter. U.S. Fish and Wildlife Service. Available online: https://www.fws.gov/species/alabama-heelsplitter-potamilus-inflatus.

seasonally in the Baton Rouge area as both a migratory species and a local breeder. Baton Rouge is located within the Central Mississippi Flyway, a critical migration corridor for numerous bird species, particularly during the winter months. Suitable monarch habitat includes urban, suburban, agricultural, and natural areas where nectar-producing plants are available.[23] Primary threats to the species include habitat loss, climate change, and widespread pesticide use.[24]

3.3.2.2 State Species of Concern

The Louisiana Department of Wildlife and Fisheries (LDWF) maintains a list of fish, plants and wildlife species that are protected under Louisiana state law, specifically under Louisiana Revised Statutes (La. R.S.) Title 56: Wildlife and Fisheries, Part V: Threatened and Endangered Species, commonly referred to as Louisiana's Nongame Species and Endangered Species provisions. LDWF database of Rare Species and Natural Communities lists seven state-listed threatened or endangered species in West Baton Rouge, East Baton Rouge, and Livingston Parishes.[25] A list of the species with a potential to occur within the subject counties is provided in **Appendix B**.

3.3.2.3 Migratory Birds

Migratory birds within the Baton Rouge Action Area are most active during two major migration periods each year — spring migration (March–May) and fall migration (mid-July – October). Because Baton Rouge lies along the Mississippi Flyway and near the Gulf Coast, it experiences some of the highest migration volumes in North America. The Action Area is located within two Bird Conservation Regions (BCR).

The majority of the Action Area lies within BCR 26, the *Mississippi Alluvial Valley*, which consists of approximately 24 million acres of alluvial floodplain south of the Mississippi River's confluence with the Ohio River spanning portions of Illinois, Missouri, Kentucky, Tennessee, Arkansas, Mississippi, and Louisiana. Historically, the region was known for critical wintering habitat for species including the Mallard, Wood Duck, Northern Pintail, and other waterfowl. Despite flood control and deforestation for agricultural uses, the BCR is estimated to contain approximately 9% of the continental duck population. [26]

The remaining portion of the Action Area west of the Mississippi River is within BCR 25, West Gulf Coastal Plain/Ouachitas. Pines dominate the area along with hardwood-dominated bottomlands along the Arkansas River and other drainages. Bottomland hardwoods and associated wetlands support substantial wintering populations of a number of waterfowl species, specifically Mallards and breeding and wintering Wood Ducks. Additionally, BCR 25 is a primary migration corridor for significant numbers of other dabbling ducks.[27]

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[23] Monarch Butterfly. Louisiana Department of Wildlife and Fisheries. Available online: https://www.wlf.louisiana.gov/species/detail/monarch-butterfly. Accessed March 2026.

[24] Have you seen what is buzzing at our pollinator garden? September 2025. Baton Rouge Zoo. Available online: https://brzoo.org/news/have-you-seen-what-is-buzzing-at-our-pollinator-garden. Accessed March 2026.

[25] Rare Species and Natural Communities by Parish. 2026. Louisiana Department of Wildlife and Fisheries. Available online: https://www.wlf.louisiana.gov/page/rare-species-and-natural-communities-by-parish. Accessed March 2026.

[26] Bird Conservation Region 26 – Mississippi Alluvial Valley. 2021. U.S North American Bird Conservation Initiative (NABCI). Available at: https://nabci-us.org/resources/bird-conservation-regions-map/#bcr26. Accessed March 2026.

[27] Bird Conservation Region 25 - West Gulf Coastal Plain/Ouachitas. 2021. U.S North American Bird Conservation Initiative (NABCI). Available at: https://nabci-us.org/resources/bird-conservation-regions-map/#bcr25. Accessed March 2026.

Species of conservation concern that may occur within BCR 25 & 26 include the American Golden-plover (*Pluvialis dominica*), Cerulean Warbler (*Setophaga cerulea*), Chimney Swift (*Chaetura pelagica*), Eastern Whip-poor-will (*Antrostomus vociferus*), Henslow's Sparrow (*Centronyx henslowii*), Kentucky Warbler (*Feothylpis formosa*), King Rail (*Rallus elegans*), Le Conte's Sparrow (*Ammospiza leconteii*), Least Tern (*Sternula antillarum antillarum*), Lesser Yellowlegs (*Tringa flavipes*), Little Blue Heron (*Egretta caerulea*), Prairie Warbler (*Setophaga discolor*), and Redheaded Woodpecker (*Melanerpes erythrocephalus*).[28]

The Chimney Swift, Little Blue Heron, and Redheaded Woodpecker are Birds of Conservation Concern (BCC) with high probability of being found within the operating area.

These species utilize a variety of habitats found within and surrounding Baton Rouge including prairies, wetlands, forested uplands, and urban and suburban areas. Within the Action Area, natural habitats occur as fragmented patches of wetland, riparian corridor, and restored prairie which are interspersed with developed land.

Chimney Swifts often make their nests in manmade vertical surfaces preferring brick chimneys with open caps.[29] It is possible that Chimney Swifts may be nesting within the operating area and that drone operations in close proximity could affect its nesting sites during its breeding nesting season (March to August). While it is not expected that infrequent drone overflights would cause adverse effects to nesting or feeding Chimney Swifts, Prime Air would conduct annual desktop reviews of available databases to determine active nesting sites and take avoidance measures if determined to be necessary.

Little Blue Herons typically nest in low trees or dense shrubs near or over water.[30] They typically flush at 19-96 meters when approached on foot by humans or up to 108 meters away from disturbance of roost sites by watercraft. These aquatic species are only located in or around wetlands or other waterbodies and may endure brief disturbance from drones as they approach a delivery site; however, no adverse effects to the species are expected.

The Redheaded Woodpecker primarily occupies open, park-like habitats, and open bottomland hardwood forests with scattered mature trees. This species is typically classified as primary cavity nesters, excavating their own nest cavities almost exclusively in dead or decaying wood.[31] These species are widespread and brief drone operations at standard altitudes are not expected to result in adverse effects.

The Bald Eagle was delisted from protection under the ESA in 2007. However, the Bald Eagle is still protected under the BGEPA, MBTA, but is delisted in Louisiana. Bald Eagles are commonly observed near large open water habitats such as rivers, lakes, and the coast. Bald Eagles nest in large pine trees near water bodies that provide dependable food sources. Within the Action Area, eagles are observed year-round. The Orleans Audubon Society engages volunteers to locate and identify eagle nests across an extensive geographic region. A nest was documented within the operational boundary along River Road

[28] U.S. Fish and Wildlife Service. *Species List – Louisiana Ecological Services Field Office* (2026).

[29] On the Wing with Chimney Swifts. U.S. Fish and Wildlife Service. Available online: https://www.fws.gov/story/chimney-swifts. Accessed March 2026.

[30] Little Blue Heron (LBHE). 2026. Cornell Lab – Land Trust Bird Conservation Initiative. Available online: https://www.birds.cornell.edu/landtrust/little-blue-heron-lbhe/. Accessed March 2026.

[31] North Louisiana Wildlife, Red-Headed Woodpeckers at a Glance. 2026. North Louisiana Wildlife. Available online: https://northlouisianawildlife.com/birds/red-headed-woodpecker/. Accessed March 2026.

in East Baton Rouge Parish; however, this record has not yet been verified[32]. Based on the National Bald Eagle Management Guidelines, to reduce an incursion incident, aircraft should stay at least 1,000 ft from Bald Eagle nests during the breeding season unless the aircraft is operated by a trained wildlife biologist.

Potential nest locations can be found as **Figure B-1** in **Appendix B**.

3.3.3 Environmental Consequences

Drones used for commercial package delivery fly at lower speeds and elevations and are smaller than conventional aircraft. Furthermore, the drones would be hovering in fixed positions at both the PADDC and delivery locations leaving them temporarily exposed to a potential mobbing and/or attacking bird defending its breeding territory.

Bird behavior, in particular mobbing and territorial defense behaviors, on flying and hovering drones is the most important risk consideration analysis, as these behaviors are the most pertinent to the Proposed Action. Mobbing behavior includes birds emitting alarm calls, flying at a potential predator, diverting its attention, and harassing it. Mobbing and aerial attack behaviors typically occur when a raptor, crow, or other aerial predators enter the airspace of a breeding habitat bird or territorial male.[33] Certain species of birds are known to harass, mob, and attack aerial predators that fly into or near their territory, especially during the breeding season when birds are actively nesting. The defending birds will chase, dive bomb, attack the backside, and vocalize to harass the aerial predator until the offender is far enough from the territory that the defending birds cease attacking and return to their nests and foraging activities.[34] Not all bird species exhibit mobbing and territorial defensive behaviors. Some bird species are more aggressive, defensive, and cued on aerial predators, while other species may show aggression or interest towards an overflying hawk in its territory. Species of birds that exhibit mobbing and territorial defense behaviors include Northern Mockingbirds, kingbirds, blackbirds, grackles, jays, crows, ravens, and some raptors.

The MK30 drone would utilize existing infrastructure at the PADDC. There would be no further expansion of the PADDC, or habitat modification associated with the Proposed Action. Earlier construction was not part of the Proposed Action reviewed by the FAA, but any future ground construction at the PADDC site would require approval or authorization by the FAA.

Prime Air's drones would not touch the ground in any place other than the PADDC (except during emergency landings) since it remains airborne while conducting deliveries. All phases of operation would be taking place within airspace, and typically well above the tree line and away from sensitive habitats. After launch, Prime Air's drone would rise to a cruising altitude under 400 ft AGL and follow a preplanned route to its delivery site. The pre-planned route is optimized to avoid terrain and object obstructions, areas of high aircraft traffic, and areas where people may gather in large numbers such as highways, parks, and schools.

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[32] Bald Eagle Nest Monitoring. 2026. Orleans Audubon Society. Available online: https://jjaudubon.net/bald-eagle-nest-monitoring/. Accessed March 2026.

[33] Royal Society for the Protection of Birds (RPSB). 2023. What is Mobbing? Available: https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/birdwatching/bird-behaviour/what-is-mobbing/, accessed July 2023 and February 2024.

[34] Kalb, N., and C. Randler. 2019. Behavioral Responses to Conspecific Mobbing Calls Are Predator-Specific in Great Tits (Parus major). Ecology and Evolution 9(16):9207–9213. Available: https://doi.org/10.1002/ece3.5467.

Drones would typically stay between 180 and 377 ft AGL except when descending to drop a package. When making a delivery, the drone descends, and packages are dropped to the ground from approximately 13 ft AGL. Packages are carried internally in the drone's fuselage and are dropped by opening a set of payload doors. After the package is dropped, the drone then climbs vertically to approximately 180 to 377 ft and reverses the path taken, returning to the takeoff/landing pad at the PADDC. The drone would take approximately 61 seconds to complete a delivery, which includes the descent from en route altitude, dropping the package, and returning back to en route altitude. As a result, the duration of exposure by most wildlife on the ground to the visual or noise impacts from the drone would be of very short duration (approximately one minute).

It is not likely that listed species would be in the vicinity of the delivery location because such locations would be developed areas. However, even if species were expected to be exposed to this noise level, the noise would be unlikely to cause significant disturbance. At a potential maximum of 1,000 flights per day across the entire Action Area of the PADDC, the distribution and altitude of the flights are not expected to significantly affect wildlife in the Action Area.

A significant impact on federally listed threatened and endangered species would occur when the USFWS or NMFS determines the proposed action would be likely to jeopardize the continued existence of a federally listed threatened or endangered species or would be likely to result in the destruction or adverse modification of federally designated critical habitat. An action need not involve a threat of extinction to federally listed species to meet the NEPA standard of significance. Lesser impacts, including impacts on non-listed or special-status species, could also constitute a significant impact.

Additionally, the FAA has looked at the potential effects of wildfires that may be caused by the Proposed Action. While the Prime Air drone has been evaluated for airworthiness and is considered to be safe for the proposed operations over the operating area, the FAA acknowledges that a crash may occur and could result in a wildfire. Amazon Prime Air will use system reported data to locate and report an off-nominal drone and will follow their Safety Management System's prescribed Incident Response Process to coordinate with local first responders as required. Due to the limited forested area within the Action Area, potential for wildfires is minimal.

The FAA understands that Prime Air would immediately notify local emergency fire response services if one of its drones were to crash, and that fire responders would be able to manage any wildfire that could occur before the wildfire could cause significant impacts to biological resources in the operating area.

3.3.3.1 No Action Alternative

Under the No Action Alternative, the FAA would not issue the approvals necessary to enable Prime Air to conduct commercial drone package delivery operations in the Baton Rouge, LA operating area, including the use of the MK30 drone. Accordingly, the No Action Alternative would not result in impacts on biological resources.

3.3.3.2 Proposed Action

The Proposed Action includes up to 1,000 MK30 drone flights per day, up to 365 days per year, operating between 6 a.m. and 10:30 p.m. There would be no ground construction or habitat modification associated with the Proposed Action. The drone would not touch the ground in any other place than the PADDC

(except during emergency landings) because it remains aerial while conducting deliveries. Scheduled deliveries would initiate from the PADDC at an en route altitude of less than 400 ft AGL and would generally occur between 180 and 377 ft AGL. The drone would lower to around 13 ft AGL and hover for two seconds to make a delivery. Then, the drone would transition back to an en route flight mode to return to the PADDC.

Operations would occur mostly in an urban environment, typically well above the tree line and away from sensitive habitats and given the short duration of increased ambient sound levels, flights are not expected to significantly influence wildlife in the area. A direct line of communication would be established with the Louisiana Department of Wildlife and Fisheries to discuss any potential concerns regarding impacts on wildlife or habitat in the Action Area. In addition, Prime Air would also specifically coordinate with the managing entities of state parks and natural areas within the Action Area on the thoughtful placement and use of delivery sites within these areas as necessary.

Special-Status Species

The tricolored bat, federally proposed endangered, may be located within the Action Area. The Proposed Action may include drone operations up until 10:30 p.m., which is anticipated to overlap with the dusk emergence of bat activity; however, drone operations will not affect the dawn civil twilight hours and will not operate in nighttime hours. The MK30 drone is not equipped nor is it authorized to operate in periods of darkness (before Morning Civil Twilight or after Evening Civil Twilight). Although operations may occur during dusk emergence, the listed bat species typically forage in areas near water or along forested edges.[35] Research suggests that drones have "*minimal impact on bat behavior*"[36] and that bats do not appear to be disturbed by drones.[37] The Action Area is located in the Year-Round Active Zone 2 for the tricolored bat. No official hibernation time period exists; however, intermittent torpor typically occurs from mid-November through February. Temperatures can occasionally drop below 40 degrees Fahrenheit in Year-Round Active Zone 2 areas; however, it is anticipated these periods would be short in duration. During warmer winter nights, tricolored bats periodically arouse and forage rather than remaining continuously hibernating. [38] Therefore, the risk of bat conflicts is anticipated to be reduced during the winter torpor period and comparatively higher during the active season. Bats at roost or in flight could experience drone noise during the en route and delivery flight phases. Bats foraging at or near the tree line at the time a drone flies by would experience the greatest sound levels. Roosting bats or bats foraging near the ground at the time a drone flies by would experience lower sound levels. Given the estimated sound levels of the drone, the drone's linear flight profile to and from the PADDC and delivery locations, the short period of time the drone would be in any location, and the low probability of encountering an individual bat in the Action Area, drone noise is not expected to adversely affect bats. Any increase in ambient sound levels caused by the drone's flight would only last a few seconds during the en route phase and approximately 49 seconds during a delivery. Given the bat's ability to avoid flying into objects, the

[35] US Fish & Wildlife Service, Tricolored Bat. Available: https://www.fws.gov/species/tricolored-bat-perimyotis-subflavus. Accessed: February 2025.

[36] Fu, Y., M. Kinniry, and L.N. Kloepper. 2018. The Chirocopter: A UAV for Recording Sound and Video of Bats at Altitude. Methods in Ecology and Evolution 9(6):1531-1535. Available: https://doi.org/10.1111/2041-210x.12992

[37] August, T. and T. Moore. 2008. Autonomous Drones Are a Viable Tool for Acoustic Bat Surveys. Available: https://www.biorxiv.org/content/10.1101/673772v1.full.pdf. Accessed July 2023 and February 2024.

[38] Northern Long-eared Bat and Tricolored Bat Voluntary Environmental Review Process for Development Projects Version 1.1. U.S. Fish and Wildlife Service. April 2025. Available at: https://www.fws.gov/sites/default/files/documents/2025-04/nleb_tcb_consultation_guidance_version-1.1_final_.pdf. Accessed April 2026.

short period of time the drone would be in any one place, and the low probability of encountering a bat during operations, the likelihood of the drone striking a bat is extremely low.

Based on 1) operations occurring mostly in an urban environment, 2) the altitude at which the drone flies in the en route phase (180 to 377 ft AGL), 3) the expected low sound levels experienced by a bat, 4) the short duration of any increases in ambient sound levels, 5) the low probability of a listed bat species occurring in the Action Area, and 6) the low likelihood of the drone striking a bat, the FAA has determined that the Action will have *may affect, but is not likely to adversely affect* on the tricolored bat.

Activities associated with the Proposed Action are anticipated to have *no effect* on the federally threatened West Indian manatee, as the project does not involve any disturbance or modification of waterbodies.

Similarly, the activities related to the Proposed Action are expected to result in *no impact* on the federally proposed threatened alligator snapping turtle. The scope of the project specifically excludes ground disturbance in natural areas and does not involve modifications to wetlands or water bodies.

Additionally, activities connected to the Proposed Action will have *no effect* on the federally listed Inflated heelsplitter. While the presence of the salamander mussel was noted in IPaC reports, the project does not include any actions resulting in ground disturbance to natural areas or changes to wetlands or waterbodies.

The monarch butterfly (proposed threatened) has the potential to occur in the operating area. Information regarding drone impacts on insects is limited and there have been no widespread negative impacts identified in scientific literature. Some research shows that monarch butterflies are not commonly observed at altitudes higher than 300 ft and would not be expected to frequently occur at the altitudes where Prime Air is proposing to operate.[39] Because the project will not alter milkweed availability, floral resources, or habitat structure, and monarchs generally fly well below typical drone operating altitudes, it is not anticipated to affect the life cycle or habitat of the monarch butterfly. Therefore, the Proposed Action will have *no effect* on this species.

Appendix B identifies the federal and state-listed threatened and endangered species that could occur in East Baton Rouge, West Baton Rouge, and Livingston Parishes. Given the habitat type and distribution required by state-listed species that may occur in the Action Area, and due to the lack of suitable habitat, no effects to state-listed species or species habitat are anticipated.

The FAA's effect determinations for the federally listed species discussed are presented in **Table 3-2**.

[39] Altitudes attained by migrating monarch butterflies, Danaus p. plexippus (Lepidoptera: Danaidae), as reported by glider pilots. Available: https://cdnsciencepub.com/doi/abs/10.1139/z81-084. Accessed April 2022 and March 2026.

TABLE 3-2
EFFECTS DETERMINATION TABLE

Common Name	Species Name	Federal Status	Effect Determination
Tricolored bat	*Perimyotis subflavus*	Proposed Endangered	***Not Likely to Adversely Affect (NLAA)***
West Indian Manatee	*Trichechus manatus*	Threatened	***No Effect***
Alligator Snapping Turtle	*Macrochelys temminckii*	Proposed Threatened	***No Effect***
Gulf Sturgeon	*Acipenser oxyrinchus (=oxyrhynchus) desotoi*	Threatened	***No Effect***
Pallid Sturgeon	*Scaphirhynchus albus*	Endangered	***No Effect***
Inflated heelsplitter	*Potamilus inflatus*	Threatened	***No Effect***
Monarch butterfly	*Danaus plexippus*	Candidate Species	***Not Likely to Adversely Affect (NLAA)***

Source: USFWS IPaC, accessed February 2026.

3.3.3.3 Migratory Birds

Prime Air has stated to the FAA that it would monitor the operating area for any active Bald Eagle nests that may occur. Monitoring efforts would focus on annual desktop reviews of available databases for confirmation of existing nests and identification of new nests, but could also include, if required by USFWS, annual in-person visual surveys of potential nests located in drone operating areas. Bald Eagle nests are typically very conspicuous, usually five to nine ft in diameter, with a vertical depth up to 8 ft, and should be easily identified.[40] Bald Eagles are usually seen near lakes, rivers, and marshes while foraging for fish or carrion. If nests are identified, Prime Air will establish an avoidance area such that there is 1,000 ft vertical and horizontal separation distance between the vehicle's flight path and the nest. The avoidance area will be maintained until the end of the breeding season (January 15 through August 15).[41]

Of the BCC migratory birds which may occur within the area, the most likely species to occur are the Chimney Swift, Little Blue Heron, and Redheaded Woodpecker. While it is not expected that infrequent drone overflights would cause adverse effects to nesting or feeding of Chimney Swifts, Little Blue Herons, or Redheaded Woodpeckers, Prime Air would conduct annual desktop reviews of available databases to determine active nesting sites and take avoidance measures if determined to be necessary.

The other state-protected and BCC species identified breed in a variety of habitats, mainly wetlands, surface water systems, and coastal areas. The Proposed Action is not anticipated to impact the nesting or sheltering for the species, as the PADDC site is not proposed within wetland or coastal systems. Additionally, the drone's en route overflights are not expected to result in effects to any lifecycles of these species.

Due to the limited operating area and proposed number of daily operations, occasional drone overflights at approximately 180 to 377 ft AGL are not expected to impact critical lifecycles of wildlife species or their ability to survive.

[40] USFWS Midwest Region: Identification of Large Nests. Available: https://www.fws.gov/program/eagle-management/eagle-permits, accessed January 2024.

[41] USFWS. Eagle Management. Available at: https://www.fws.gov/program/eagle-management/eagle-incidental-disturbance-and-nest-take-permits, accessed December 2024.

In summary, the Proposed Action is not expected to cause any of the following impacts:

- A long-term or permanent loss of unlisted plant or wildlife species, i.e., extirpation of the species from a large action area;
- Adverse impacts to special-status species (e.g., state species of concern, species proposed for listing, migratory birds, Bald and Golden Eagles) or their habitats;
- Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations; or
- Adverse impacts on a species' reproductive success rates, natural mortality rates, non-natural mortality (e.g., road kills and hunting), or ability to sustain the minimum population levels required.

The FAA initiated Section 7 consultation with the USFWS Louisiana Ecological Services Field Office on April 1, 2026.

Copies of all agency correspondence are provided in **Appendix B**.

3.3.3.4 Reasonably Foreseeable Effects

The introduction of Prime Air's drone operations may occur in areas subject to other aviation activity, necessitating the evaluation of reasonably foreseeable effects on biological resources when combined with other aviation operations. Prime Air's proposed operations of the MK30 drone would utilize existing infrastructure at the PADDC and any future ground construction at the PADDC would require further approval or authorization by the FAA. Furthermore, drone operations would occur mostly in an urban environment, typically well above the tree line and away from sensitive habitats and given the short duration of increased ambient sound levels, flights are not expected to significantly influence wildlife in the area. In the future, other drone operations or aviation activities may be proposed to operate with this Proposed Action's operating area. Should that occur, Prime Air understands the potential for impacts may increase due to the introduction of additional drone or other aviation activity and would work with operators and the FAA to mitigate potential impacts. The FAA would also conduct a new environmental analysis—including evaluating reasonably foreseeable effects on biological resources—prior to the commencement of drone operations or other aviation activity in this area.

3.4 Department of Transportation Act Section 303 (referred to as "Section 4(f)") and Land and Water Conservation Fund (referred to as "Section 6(f)")

3.4.1 Definition of Resource and Regulatory Setting

Section 4(f) of the U.S. Department of Transportation (DOT) Act (codified at 49 U.S.C. § 303) protects significant publicly owned parks, recreational areas, wildlife and waterfowl refuges, and public and private historic sites. Section 4(f) states that "… [the] Secretary of Transportation may approve a transportation program or project requiring the use of any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance or land from a historic site of national, State, or local significance, only if there is no feasible and prudent alternative to the use of such land and the program or project includes all possible planning to minimize harm resulting from the use."

The word "use" can mean either a physical or constructive use. A Physical use is the actual physical taking of a Section 4(f) property through purchase of land or a permanent easement, physical occupation of a portion or all of the property, or alteration of structures of facilities on the property. A "constructive" use does not require a physical taking of a Section 4(f) property. A Constructive use would occur when a project produces an effect, such as excessive noise, that would result in substantial impairment to property to the degree that the activities, features, or attributes of the property that contribute to its significance or enjoyment are substantially diminished. The determination of use must consider the entire property and not simply the portion of the property being used for a Proposed Action.

The procedural obligations for Section 4(f) compliance are outlined in the FAA Order 1050.1 Desk Reference. Additionally, the FAA uses the regulations and guidance provided by the Federal Highway Administration (FHWA) when evaluating potential impacts on Section 4(f) properties.[42,43] While these requirements are not obligatory for the FAA, they may be utilized as guidance to the extent that they are applicable.[44]

The Land and Water Conservation Fund (LWCF) Act (54 U.S.C. § 200305(f)(3)), as amended, provides funding for the purchase and improvement of recreational lands, wildlife and waterfowl refuges, and other similar resources. The LWCF Act established a fund for federal acquisition of park and recreational lands and provides matching grants to state and local governments for recreation planning, acquisition, and development. Lands purchased by this fund are protected from conversion to uses other than public outdoor recreation.

3.4.2 Affected Environment

The FAA used data from federal, state, and other publicly accessible sources to identify potential Section 4(f) resources within the study area. As listed in Table C-1 of **Appendix C**, the FAA identified a total of 143 properties that could meet the definition of a Section 4(f) resource. All inventoried public parks in the operating area are administered by parish authorities. There are no national, state, or city parks in the operating area, nor are there any U.S. Fish and Wildlife Service wildlife or waterfowl refuges within the operating area. Historic and cultural resources are addressed by both Section 4(f) and the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C. § 470, as amended), and are discussed further in **Section 3.5**. Additionally, the FAA requested assistance from national, state, city, and county governments in identifying the appropriate stakeholders that are likely to have an interest in the project and its effects on Section 4(f) resources. The officials with jurisdiction under Section 4(f) regulatory interest include:

- East Baton Rouge Parish
- West Baton Rouge Parish

These organizations were informed of the Proposed Action and the opportunity to provide comments via the Notice of Availability, which was electronically distributed to them on June 23, 2026.

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42 FHWA, July 20, 2012. Section 4(f) Policy Paper. Office of Planning, Environment and Realty Project Development and Environmental Review, Washington, DC. Available at: https://www.environment.fhwa.dot.gov/legislation/section4f/4fpolicy.aspx.

43 23 CFR Part 774, Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and historic Sites (Section 4(f)).

44 Further details about the DOT Act and Section 4(f) can be accessed in 23 CFR Part 774 et seq.

As noted in Table C-2 of **Appendix C**, 28 public recreation areas and facilities in the drone operating area were developed using LWCF grant funds.

3.4.3 Environmental Consequences

3.4.3.1 No Action Alternative

Under the No Action Alternative, the FAA would not issue the approvals necessary to enable Prime Air to conduct commercial drone package delivery operations in the Baton Rouge, LA area. Accordingly, the No Action Alternative would not result in impacts on Section 4(f) and LWCF properties.

3.4.3.2 Proposed Action

Under the Proposed Action, the FAA would approve Prime Air's OpsSpec amendment so that it can introduce drone package delivery operations by using the MK30 drone across the intended Baton Rouge, LA operating area. There would be no physical use of Section 4(f) resources because the Proposed Action has no direct interaction with any resources on the ground. Constructive use could occur when a project produces an effect, such as excessive noise, that would result in substantial impairment to a property where the features of that property are substantially diminished. However, as discussed in **Section 3.6**, the Proposed Action would not result in a significant increase in noise levels at any location within the operating area. As further described in **Section 3.8**, the short duration of en route flights would minimize any potential for significant visual impacts. Therefore, the FAA has determined that the Proposed Action would not cause substantial impairment, or direct or constructive use, as defined in **Section 3.4.1**, to any of the Section 4(f) resources in the operating area. The Proposed Action would not convert property acquired or developed using LWCF grants for uses other than public outdoor recreation. Therefore, there would be no impacts related to the conversion of LWCF fund-assisted properties.

3.4.3.3 Reasonably Foreseeable Effects

The introduction of Prime Air's drone operations may occur in areas subject to other aviation activity, necessitating the evaluation of reasonably foreseeable effects on Section 4(f) and LWCF resources when combined with other aviation operations. Prime Air's operations would have no physical use of Section 4(f) and LWCF resources because the Proposed Action has no direct interaction with any resources on the ground. Furthermore, as discussed in Section 3.6, the Proposed Action would not result in a significant increase in noise levels at any location within the operating area and the short duration of en route flights would minimize any potential for significant visual impacts. In the future, other drone operations or aviation activities may be proposed to operate with this Proposed Action's operating area. Should that occur, Prime Air understands the potential for impacts may increase due to the introduction of additional drone or other aviation activity and would work with operators and the FAA to mitigate potential impacts. The FAA would also conduct a new environmental analysis—including evaluating reasonably foreseeable effects on Section 4(f) and LWCF resources—prior to the commencement of drone operations or other aviation activity in this area.

3.5 Historical, Architectural, Archaeological, and Cultural Resources

3.5.1 Regulatory Setting

This section discusses historic, architectural, archaeological, and cultural resources within the study area. These resources reflect human culture and history in the physical environment, and may include structures, objects, and other important features in past human events. Cultural resources can also include characteristics of the physical environment such as natural features and biota that are important to traditional cultural practices and institutions.

The primary laws pertaining to the treatment of historic, architectural, archaeological, and cultural resources during environmental analyses are the *National Historic Preservation Act of 1966* (NHPA) (54 U.S.C. §§ 300101 *et seq*.), the *Archaeological Resources Protection Act* (16 U.S.C. §§ 470aa-470mm), and the *Native Graves Protection and Repatriation Act* (25 U.S.C. §§ 3001-3013).

Section 106 of the NHPA requires federal agencies with jurisdiction over a proposed federal action (referred to as an "undertaking" under the NHPA) to take into account the effects of the undertaking on historic properties and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on any undertaking that would adversely affect properties eligible for listing in the National Register of Historic Places (National Register). The term "historic properties" describes "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register" (36 CFR § 800.16(l)(1)).

As documented in the 1050.1 Desk Reference, the regulations implementing Section 106 require the FAA to consult with certain parties, such as the SHPO and the THPO of a Federally Recognized Indian Tribe pursuant to Section 1010(d)(2) of the NHPA. Consultation with THPO(s) occurs if an undertaking is occurring on tribal lands or if an undertaking's Area of Potential Effects (APE) is located outside tribal lands but includes historic resources of religious and cultural significance to a tribe. The purpose of consultation is to identify potentially affected historic properties, assess effects to such properties, and seek ways to avoid, minimize, or mitigate any adverse effects on such properties. The agency also must provide an opportunity for public involvement (36 CFR § 800.1(a)). Consultation with Federally Recognized Indian Tribes regarding issues related to Section 106 must recognize the government-to-government relationship between the Federal Government and Native American tribes as set forth in Executive Order (EO) 13175, "*Consultation and Coordination with Indian Tribal Governments*" and the Presidential Memorandum on Tribal Consultation, dated November 5, 2009.

Consultation under Section 106 is not required if the undertaking has no potential to affect historic properties. The regulations implementing Section 106 state: "If the undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present, the agency official has no further obligations under section 106 of this part." (36 CFR § 800.3(a)(1)).

As discussed in FAA Order 1050.1G, the FAA has not established a significance threshold for Historical, Architectural Archaeological, and Cultural Resources. Whether an action would result in a finding of adverse effect through the Section 106 process is a consideration when assessing the significance of an

impact. However, a finding of an adverse effect does not necessarily mean an impact is significant; nor would it necessarily require the preparation of an Environmental Impact Statement. Should an adverse effect be determined to have occurred, the Section 106 process would be resolved through a Memorandum of Agreement or Programmatic Agreement to record resolution measures to mitigate or minimize adverse effects.

3.5.2 Affected Environment

The APE was established pursuant to 36 CFR § 800.4(a), encompassing approximately 175 sq mi occurring within a 7.5-mi radius surrounding the PADCC. According to the documentation and geospatial data published by the National Park Service in the National Register database and the Federal Determination of Eligibility database,[45] and the documentation and geospatial data published by the State of Louisiana on their HP Cultural Resources Map, there are 16 historic districts with approximately 1,975 contributing features,[46] 71 individual historic properties, and 2 National Historic Landmarks, totaling approximately 2,048 historic properties that are listed or have been determined eligible for listing in the National Register located in the APE. Historic properties occurring within the APE are listed in **Table D-1** of **Appendix D**.

3.5.2.1 Potentially Sensitive Historic Properties

Within 0.5 miles of a PADDC

The areas most likely to experience visual or auditory effects resulting from the undertaking are in close proximity to the PADDC. In these locations, drone operations would be concentrated due to the frequency of inbound and outbound flights. However, there are no known historic properties located within 0.5 mi of the PADDC where potential visual or auditory effects would be concentrated.

Historical Significance Considerations

Historic properties with historical significance that could be affected by the undertaking include properties where a quiet or pre-industrial setting is essential to the integrity of the resource. These historic properties may include cemeteries, areas where outdoor religious practices may occur, properties associated with early settlement or habitation, or tribal cultural resources. Based on these criteria, there are approximately 17 known historic properties within the APE that are parks, religious institutions, cemeteries, or have significance that is partially based on a quiet or pre-industrial setting.

3.5.3 Environmental Consequences

3.5.3.1 No Action Alternative

Under the No Action Alternative, the FAA would not issue the approvals necessary to enable Prime Air to conduct commercial drone package delivery operations in the Baton Rouge, LA area. As such, there would be no impact on any historical, architectural, archaeological, or cultural resources.

[45] The most recent versions of the National Register and Federal DOE databases were last updated on June 24, 2025, and are available at www.nps.gov/subjects/nationalregister/database-research.htm.

[46] The total number of contributing features is approximate because not all districts had documentation that enumerated the specific number of contributing features. Also, some districts did not have current documentation available to the public that could be referenced.

3.5.3.2 Proposed Project

As outlined in 36 CFR § 800.5(a), an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The undertaking does not include any actions that would physically alter a historic property in any way, nor would it change the use of a historic property or involve the transfer of property out of Federal ownership. Any adverse effects that may result from the undertaking are limited to the potential introduction of visual, atmospheric, or audible elements that could diminish the integrity of the property's significant historic features.

The noise modeling methodology and methods presented in **Section 3.6** are suitable for the evaluation of Federal actions in compliance with NEPA and other applicable environmental regulations or federal review standards at the discretion and approval of the FAA. In particular, the analysis is intended to function as a nonstandard equivalent methodology under FAA Order 1050.1G, and therefore, required prior written consent from the FAA's Office of Environment and Energy for each project seeking a NEPA determination. The number of daily drone operations would be limited such that any historic or cultural resource would only be subject to a small number of overflights per day. Furthermore, the noise analysis presented in Section 3.6 concluded that noise levels would be below the FAA's threshold for significance, even in areas with the highest noise exposure, such as those within 0.5 mi of the PADDC.

The FAA has not developed a visual effects significance threshold; however, factors the FAA considers in assessing significant impacts include the degree to which the action would have the potential to: (1) affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources; (2) contrast with the visual resources and/or visual character in the study area; or (3) block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations. The Proposed Undertaking makes no changes to any landforms or land uses, and visual effects would be short-term in nature; thus, there would be no effect to the visual character of the area. Excluding ground-based activities supporting the drones, operations would be occurring in airspace only. The FAA estimates that, at typical operating altitude and speeds, the drone would be observable for approximately 3.6 seconds during en route flight by an observer on the ground.

As noted above, there are 17 known historic properties that could be categorized as having historical significance that could be diminished by the introduction of new visual, atmospheric, or audible elements. These historic properties include 3 cemeteries which are currently subjected to vehicular and ambient noise from adjacent activities. There are 2 religious institutions which are located within urban or suburban environments. Two are historic residential properties from the last half of the 19th century. The remaining 10 represent historic properties or sites that have significance that dates to before 1850, when the area was much more rural and less industrial than the present. Except for the Pentagon Barracks, all are plantation houses or related buildings. Most are now located on much smaller parcels that are surrounded by modern development. As such, they regularly experience auditory and visual intrusions from modern activity. Only one historic property – Homestead Plantation – retains a rural setting and is surrounded by agricultural uses. While this does not isolate these resources from modern auditory or visual intrusions, it currently experiences a relatively low frequency of such events which are primarily composed of automobile traffic on a nearby road. Homestead Plantation is located near the outer edge of the APE. Because of its distance from the PADDC, it would experience very few, if any, non-property-owner initiated drone flights

associated with the project. Additionally, none of these sensitive sites are located within 0.5 mi of the PADDC and all are currently subject to some level of vehicular traffic or overhead flight patterns.

Based on the anticipated noise levels, distance of historic properties from the most heavily trafficked areas near the PADDC, and the brief duration of any potential visual, atmospheric, or auditory intrusions, FAA concluded a finding of *no adverse effects* to historic properties for this undertaking.

The FAA initiated consultation with the LA SHPO on June 8, 2026, seeking concurrence with the FAA's definition of the APE and its finding of *no adverse effects*.

Copies of the SHPO consultation are included in **Appendix D-1**.

The FAA also consulted with Tribal Governments, on April 7, 2026 (via email and regular mail), that may potentially attach religious or cultural significance to resources in the APE, which include the following:

- Absentee Shawnee Tribe of Oklahoma
- Caddo Nation of Oklahoma
- Chitimacha Tribe of Louisiana
- Coushatta Tribe of Louisiana
- Jena Band of Choctaw Indians
- Quapaw Nation
- Seminole Tribe of Florida
- Tunica-Biloxi Tribe of Louisiana

Copies of representative correspondence with potentially interested Tribal Governments and all specific replies are included in **Appendix D-2**.

3.5.3.3 Reasonably Foreseeable Effects

The introduction of Prime Air's drone operations may occur in areas subject to other aviation activity, necessitating the evaluation of reasonably foreseeable effects on historical, architectural, archaeological, and cultural resources when combined with other aviation operations. Prime Air's drone operations would have limited non-physical, temporary impacts on historic properties such as the introduction of audible and/or visual elements. Furthermore, as described in Section 3.6, a noise analysis concluded that noise levels would be below the FAA's threshold for significance, even in areas with the highest noise exposure. The SHPO office within Prime Air's proposed area of operations also concurred with the FAA's determination, the Proposed Action, would have no adverse effects. In the future, other drone operations or aviation activities may be proposed to operate with this Proposed Action's operating area. Should that occur, Prime Air understands the potential for impacts may increase due to the introduction of additional drone or other aviation activity and would work with operators and the FAA to mitigate potential impacts. The FAA would also conduct a new environmental analysis—including evaluating reasonably foreseeable effects on historical, architectural, archaeological, and cultural resources and

consultation with SHPOs and tribal governments, as appropriate—prior to the commencement of drone operations or other aviation activity in this area.

3.6 Noise and Noise-Compatible Land Use

3.6.1 Regulatory Setting

Aircraft noise is often the most noticeable environmental effect associated with any aviation project. Several federal laws, including the Aviation Safety and Noise Abatement Act of 1979, as amended (49 U.S.C. §§ 47501–47507) regulate aircraft noise. Through 14 CFR Part 36, the FAA regulates noise from aircraft. To ensure that noise would not cause a significant impact to any residential land use or noise sensitive resource within the study area, the FAA initiated an analysis of the potential noise exposure in the area that could result from implementation of the Proposed Action.

FAA Order 1050.1G, Appendix C, requires the FAA to identify the location and number of noise sensitive areas that could be significantly impacted by noise. As defined in the FAA Order 1050.1 Desk Reference, *a noise sensitive area* is "[a]n area where noise interferes with normal activities associated with its use. Normally, noise sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas, areas with wilderness characteristics, wildlife refuges, and cultural and historical sites."

Sound is measured in terms of the decibel (dB), which is the ratio between the sound pressure of the sound source and 20 micropascals, which is nominally the threshold of human hearing. Various weighting schemes have been developed to collapse a frequency spectrum into a single dB value. The A-weighted decibel, or dBA, corresponds to human hearing accounting for the higher sensitivity in mid-range frequencies and reduced sensitivity for lower and highest frequencies. Unless otherwise noted, all sound levels discussed in this document should be understood to be A-weighted.

To comply with NEPA requirements, the FAA has issued requirements for assessing aircraft noise in Appendix C of FAA Order 1050.1G. The FAA's primary noise metric for aviation noise analysis is the yearly Day-Night Average Sound Level (DNL) metric. The DNL metric is a single value representing the logarithmically average aircraft sound level at a location over a 24-hour period, with a 10 dB adjustment added to those noise events occurring from 10 p.m. to 7 a.m. A significant noise impact is defined in Appendix C of FAA Order 1050.1G as an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure or a noise exposure at or above the 65 dB level due to a DNL 1.5 dB or greater increase at a noise sensitive receiver (e.g., residential).

3.6.2 Affected Environment

As shown in **Figure 2-1**, the operating area covers approximately 174 sq mi, and the estimated population is roughly 400,000. The population density is approximately 2,300 people per sq mi.[47] There is one airport and 13 heliports located in the MK30 drone's proposed area of operations, as listed in **Table 3-3**.[48]

TABLE 3-3
AIRPORTS AND HELIPORTS WITHIN THE DRONE OPERATING AREA

FAA Identifier	Name	Facility Type	Airspace Classification
BTR	Baton Rouge Metropolitan Airport	Airport	C
LA89	Jenkins Heliport	Heliport	
27LS	LA DOTD HQ	Heliport	
85LA	Spencer Calahan Office Building	Heliport	
27LA	Baton Rouge General Hospital	Heliport	
LA28	Louisiana State Police Headquarters	Heliport	
04LS	LA National Guard	Heliport	
49LA	Baton Rouge Police	Heliport	
63LA	Celtic Heliport	Heliport	
29LA	Our Lady of the Lake Regional Medical Center	Heliport	
23LS	Olol Children's Hospital	Heliport	
LA00	Baton Rouge General Medical Center	Heliport	
1LA0	Woman's Hospital	Heliport	
LA05	Baton Rouge Heliport	Heliport	

Source: U.S. Department of Transportation, 2026.

3.6.3 Environmental Consequences

3.6.3.1 No Action Alternative

Under the No Action Alternative, the FAA would not issue the approvals necessary to enable Prime Air to conduct commercial drone package delivery operations in the Baton Rouge, LA area. As such, no impacts to noise and noise-compatible land use would occur.

3.6.3.2 Proposed Action

Human perception of noise depends on a number of factors, including overall noise level, number of noise events, the extent of audibility above the background, ambient noise level, and acoustic frequency content

[47] U.S. Census Bureau, "Total Population," American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B01003, accessed on March 17, 2026, https://data.census.gov/table/ACSDT5Y2024.B01003?g=050XX00US22033$1500000,22063$1500000,22121$1500000&y=2024&d=ACS+5-Year+Estimates+Detailed+Tables&tp=true.

[48] It is necessary to evaluate the total noise exposure in areas subject to other aviation noise sources.

(pitch).[49] Drone noise generally has high-frequency acoustic content, which can often be more discernable from other typical noise sources.

To ensure that noise would not cause a significant impact to any noise sensitive area within the operating area, the FAA initiated an analysis of the potential noise exposure in the area that could result from implementation of the Proposed Action. Except for the actual PADDC property, the rural, commercial, and residential properties that are adjacent to the PADDC location are likely to experience the highest noise levels as a result of the Proposed Action. This is due to noise from drone departures from and arrivals to the PADDC, as well as more concentrated en route noise from the drones transiting to and from the PADDC.

Noise Exposure

Utilizing the operational projections defined in **Chapters 1** and **2**, the noise analysis methodology detailed in **Appendix E** was used to estimate DNL levels for the proposed Baton Rouge, LA area operations. Noise levels were calculated for each flight phase and are presented in the following three sub-sections:

- Noise Exposure for PADDC Operations
- Noise Exposure for En Route Operations
- Noise Exposure for Delivery Operations

Noise Exposure for PADDC Operations

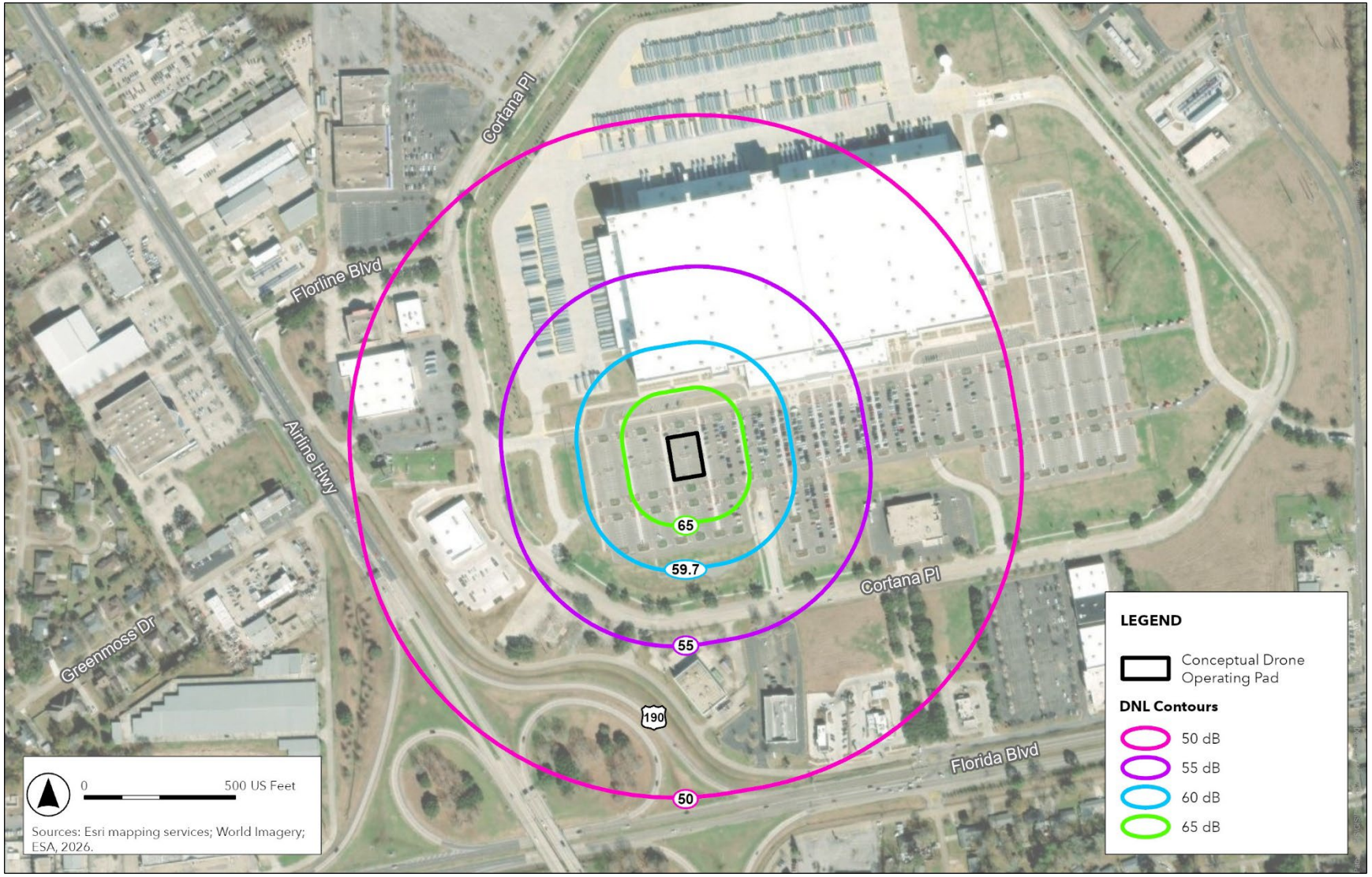
Based on the anticipated average daily maximum of 1,000 deliveries provided by Prime Air for the PADDC, with 100 of the 1,000 daily deliveries (10%) occurring during the period from 6 a.m. to 7 a.m. and 10 p.m. to 10:30 p.m., the extent of noise exposure associated with PADDC operations is shown in **Figure 3-1**. This region was determined based on a review of the layout of the PADDC location and using the noise level information presented in **Table 6** of the Technical Noise Report in **Appendix E**. The noise analysis includes a 10 dB penalty which is applied to the 100 operations that are anticipated to occur during the nighttime period from 10 p.m. to 7 a.m. and is equivalent to 1 nighttime operation being counted as 10 daytime operations. These 100 night-time delivery operations would be equivalent to 1,000 daytime deliveries and, when combined with the daytime operations, would be equivalent to a combined total of 1,900 daytime equivalent delivery operations. **Table 3-4** provides the extent of noise exposure for PADDC operations for the DNL 65 dB and lower noise levels. Note that the data presented in **Table 3-4** only includes noise exposure associated with PADDC operations.

TABLE 3-4
ESTIMATED EXTENT OF NOISE EXPOSURE FROM PADDC

Annual Average Daily DNL Equivalent Deliveries	Annual DNL Equivalent Deliveries	DNL 50 dB	DNL 55 dB	DNL 59.7 dB	DNL 60 dB	DNL 65 dB
≤1,900	≤693,500	1,050 feet	550 feet	300 feet	300 feet	150 feet

Source: ESA, 2025.

[49] Federal Aviation Administration, Fundamentals of Noise and Sound. Available: https://www.faa.gov/noise/aviation_noise/fundamentals_of_noise, accessed April 30, 2024.



Source: ESA, 2026; World Imagery; Esri Mapping Services.

Figure 3-1
Noise Exposure Contours – BTR1 PADDC

Noise Exposure for En Route Operations

As described in the Noise Technical Report in **Appendix E**, the drone is expected to typically fly the same outbound flight path between the PADDC and delivery points and inbound flight path back to the PADDC. While the total average daily deliveries from the PADCC is 1,000, the number of overflights in a day will be dispersed because the PADCC is centrally located in the proposed operating area and delivery locations would be distributed throughout the proposed operating area. A conservative estimate for the maximum number of overflights over any one location would be half, or 500 daily delivery overflights. To account for operations from the PADCC during the period from 6 a.m. to 7 a.m. and from 10 p.m. to 10:30 p.m., it is assumed approximately 50 of the 500 daily delivery overflights (10%) would occur during these periods. These 50 night-time delivery overflight operations would be equivalent to 500 daytime deliveries. When combined with the daytime delivery overflight operations, this would be representative of a combined total of 950 daytime equivalent delivery overflight operations. Since each delivery involves both an outbound and inbound flight path, this equates to 1,900 daily overflights. The en route noise exposure can be determined by referencing **Tables 7** and **8** of the Technical Noise Report in **Appendix E**. This analysis shows that en route noise levels could reach DNL 46.0 dB in any location within the operating area.

Noise Exposure for Delivery Operations

Due to the inherent uncertainty of the exact delivery site locations, the noise analysis developed a minimum and maximum representative average annual daily distribution of deliveries that could occur at a single delivery location in the operating area. The distribution of average annual daily deliveries ranges from one to four deliveries per operating day and conservatively assumes that at least one delivery will occur during the nighttime period between 6 a.m. and 7 a.m. and 10 p.m. and 10:30 p.m. This nighttime delivery is equivalent to 10 daytime deliveries, and when combined with daytime deliveries, is equivalent to a total combined maximum of 13 equivalent daytime delivery operations. The noise exposure for delivery operations includes outbound and inbound en route overflights at the typical operating altitude range of 180 to 377 ft AGL for operations associated with deliveries to other locations. The outbound en route altitude is expected to be flown between 180 and 279 ft AGL. The inbound en route altitude is expected to be flown between 279 and 377 ft AGL back to the PADDC.

A conservative estimate of delivery noise exposure can then be determined by referencing **Table 9** of the Technical Noise Report in **Appendix E**. The estimated delivery DNL includes values at the minimum and maximum distribution of DNL equivalent deliveries at various distances from the delivery point. They include the minimum listener distance from the delivery point at 16.4 ft, which is representative of the closest distance a person may approach before the drone takes automated actions to safely cancel the delivery. This is in addition to the minimum measured distance from the drone for which noise measurement data was available for a delivery, which is 25 ft. Values were also calculated at distances of 50 ft, 75 ft, 100 ft, and 125 ft from the delivery point, and are representative of distances from which nearby properties may experience noise from a delivery based on the average lot size for sold homes as reported in the 2022 US Census.[50] The noise exposure for any one delivery point (with en route noise as mentioned above) is provided in **Table 3-5**.

[50] The 2022 US Census national average lot size for single-family sold homes was 15,265 sq ft. This is representative of a property with dimensions of a 123.55 x 123.55-ft square. 125 ft represents a 125-ft lateral width of the parcel rounded up to the nearest 25 ft. Available: https://www.census.gov/construction/chars/xls/soldlotsize_cust.xls, accessed January 18, 2024.

TABLE 3-5
DNL FOR DELIVERY LOCATIONS BASED ON MAXIMUM DELIVERIES PER LOCATION

APE Overlaps	Average Daily DNL Equivalent Deliveries	Annual DNL Equivalent Deliveries	Estimated Delivery DNL at 16.4 Feet[1]	Estimated Delivery DNL at 25 Feet[2]	Estimated Delivery DNL at 50 Feet	Estimated Delivery DNL at 75 Feet	Estimated Delivery DNL at 100 Feet	Estimated Delivery DNL at 125 Feet
0[3]	≤15	<= 5,475	57.2	55.1	51.8	50.2	48.9	48.1

Notes:

1. Minimum possible listener distance from drone.
2. Minimum measured listener distance.
3. Assumes conservative estimate of overflights associated with 500 deliveries or 937 overflights (with nighttime equivalent operations), over any one delivery location as mentioned above. DNL values are calculated from the logarithmic summation of the DNL values presented in Table 9 for deliveries with the en route noise level of DNL 45.9 dB derived from Tables 7 and 8 in the Noise Technical Report in Appendix E.

Source: ESA, 2025.

Table 3-5 shows that, with the maximum number of average annual daily deliveries at a single location, including overflights, noise levels for the estimated number of deliveries will not exceed the FAA's significance threshold for noise of DNL 65 dB in the areas where Prime Air anticipates conducting deliveries.

Total Noise Exposure Results

The maximum noise exposure levels within the operating area would occur at the PADDC site where noise levels at or above DNL 50 dB would extend approximately 1,050 ft from the PADDC. Noise levels at or above DNL 65 dB would extend approximately 150 ft from the PADDC. No residential or other noise sensitive receivers would be exposed to noise levels of DNL 50 dB or greater associated with PADCC operations. Additionally, the estimated noise exposure for en route operations could reach up to DNL 46 dB at any location within the operating area. Lastly, the resulting noise exposure at any residential-zoned property line from deliveries would not be expected to exceed DNL 48.1 dB.

As explained in **Section 3.6.1** above, the FAA has an established noise significance threshold, defined in FAA Order 1050.1G, which is used when assessing noise impacts in a particular operating area. A significant noise impact is defined as an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure or a noise exposure at or above the 65 dB level due to a DNL 1.5 dB or greater increase. Based on the results of the noise analysis performed for this EA, noise impacts from operations are not expected to result in a significant impact. Noise generated by the operations is also not expected to be incompatible with noise sensitive resources within the operating area.

3.6.3.3 Reasonably Foreseeable Effects

Per FAA Order 1050.1G, Appendix C,[51] if any "airspace or procedure actions" are introduced, these actions must be assessed to determine if any of the following increases result from the action:

- For DNL 65 dB and higher: ± 1.5 dB

[51] https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050.1G.pdf.

- For DNL 60 dB and higher: ± 3 dB[52]
- For DNL 45 dB to < 60 dB: ± 5 dB[53]

FAA Order 1050.1G defines a "significant impact" as an action that results in ±1.5 dB change within the DNL 65 noise exposure contour over a noise-sensitive land use. A "reportable" change is a ±3 dB-change within the DNL 60 or a ±5 dB-change within the DNL 45.

Because drone operations would occur in areas subject to other aviation noise sources, it is necessary to evaluate the reasonably foreseeable noise exposure that would result from introducing the other aviation noise sources present. Examples of such scenarios are drone operations occurring in the vicinity of Prime Air's operating area with increased aviation activity (e.g., where other commercial drone operators may operate or operations close to airports). Aircraft-related noise sources are most likely to be the dominant contributors to noise exposure near airports. By comparison, other sources of noise would not appreciably contribute to overall noise levels at these locations.

As discussed in **Section 3.6.2**, there is one airport and 13 heliports located in the MK30 drone's proposed area of operations. Of which, the Class C surface area of the Baton Rouge Metropolitan Airport, Ryan Field (BTR) overlaps with a portion of the BTR1 PADCC proposed area of operations. For areas where the drone operating area does not overlap with Class C airspace, there would be little potential for the reasonably foreseeable effect of traditional aircraft noise combined with drone noise. The conservative estimate of DNL 53.8 dB represents the threshold at which a reportable change of 5 dB would occur, as defined by FAA requirements for areas where DNL falls between 45 dB and less than 60 dB. While this increase may be perceptible, it is unlikely to result in significant adverse land use impacts, as shown in **Table 3-6**.

TABLE 3-6
REASONABLY FORESEEABLE NOISE EXPOSURE

Noise Source	Description	DNL (dB)	Energy $10^{(DNL/10)}$	Combined Noise Sources in DNL (dB)
1	Proposed Action[1]	57.2	524,807.5	-
2	Airports within Study Area	53.8	239,883.3	-
1+2	Proposed Action + Airports	-	764,690.8	58.8
Delta	Reasonably Foreseeable Change in Noise Exposure	-	-	5.0

Notes:
1. Proposed Action DNL based off exposure at delivery site location to assume conservative estimates.
Source: ESA, 2025.

Additionally, Prime Air's flight route planning software would take into account air traffic to avoid dense airspace restrictions, such as airport runways and heliports. This would help avoid potential noise-related reasonably foreseeable effects on the air traffic near controlled surfaces. There are no other known

[52] The FAA considers these increases to be "reportable" but not a significant impact.
[53] The FAA considers these increases to be "reportable" but not a significant impact.

Part 135 commercial drone package delivery operators conducting operations in proximity to Prime Air's proposed MK30 drone operations area or the PADDC, which is located in an area zoned for commercial activities. As such, the addition of Prime Air's commercial delivery service is not expected to result in reasonably foreseeable effects on other potential Part 135 commercial drone operations. Any future Part 135 operators would be required to work with the FAA to complete an environmental review before beginning operations, ensuring that any potential reasonably foreseeable effects are properly analyzed and disclosed, and the appropriate siting of potential drone operating facilities would be considered to avoid a significant impact on the environment.

In the future, other drone operators may propose locating operations within this Proposed Action's operating area. Should that occur, Prime Air understands the potential for impacts may increase due to another operator's activities and would work with that operator and the FAA to mitigate potential impacts. Additionally, the FAA would conduct a new environmental analysis—including noise and reasonably foreseeable impacts—prior to another operator beginning drone package delivery operations in this area. Areas of existing aviation noise sources within the operating area would be avoided; thus, the Proposed Action would not contribute to significant reasonably foreseeable noise impacts.

3.7 Visual Effects (Visual Resources and Visual Character)

3.7.1 Regulatory Setting

Visual resources and visual character impacts deal with the extent to which the Proposed Action would result in visual impacts to resources in the operating area. Visual impacts can be difficult to define and evaluate because the analysis is generally subjective but are normally related to the extent that the Proposed Action would contrast with, or detract from, the visual resources and/or the visual character of the existing environment. In this case, visual effects would be limited to the introduction of a visual intrusion—a drone in flight—which could be out of character with the suburban or natural landscapes.

The FAA has not developed a visual effects significance threshold. Factors the FAA considers in assessing significant impacts include the degree to which the action would have the potential to (1) affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources; (2) contrast with the visual resources and/or visual character in the study area; or (3) block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations.

3.7.2 Affected Environment

The Proposed Action would take place over a combination of suburban and urban properties. As noted in **Section 3.4**, there are many public parks that could be valued for aesthetic attributes within the operating area. Prime Air's proposal is to avoid overflights of large open-air gatherings of people during the scope of the Proposed Action, which includes many public parks and other public properties that may be covered under Section 4(f) (which are identified in **Appendix C**).

3.7.3 Environmental Consequences

3.7.3.1 No Action Alternative

Under the No Action Alternative, the FAA would not issue the approvals necessary to enable Prime Air to conduct drone commercial drone package delivery operations in the Baton Rouge, LA area. As such, there would be no visual impacts associated with the No Action Alternative.

3.7.3.2 Proposed Action

The Proposed Action makes no changes to any landforms or land uses, and visual effects would be short-term in nature; thus, there would be no effect to the visual character of the area. Excluding ground-based activities supporting the drones, operations would be occurring in airspace only. The FAA estimates that at typical operating altitude and speeds the drone en route would be observable for approximately 3.6 seconds by an observer on the ground. The Proposed Action involves airspace operations that are unlikely to result in visual impacts anywhere in the operating area, including Section 4(f) properties. The short duration that each drone flight could likely be seen from most of the resources in the operating area—approximately 3.6 seconds while the drone is traveling en route at 52.4 knots (approximately 60 mph)—and the distribution of flights throughout the 175-sq mi operating area, would minimize any potential for significant visual impacts at any location in the operating area. Any visual effects are expected to be similar to existing air traffic in the vicinity of the operating areas. Therefore, the Proposed Action would not result in significant visual impacts.

3.7.3.3 Reasonably Foreseeable Effects

The introduction of Prime Air's drone operations may occur in areas subject to other aviation activity, necessitating the evaluation of reasonably foreseeable effects on visual impacts when combined with other aviation operations. Prime Air's drone operations make no changes to any landforms or land uses, and visual effects would be short-term in nature; thus, there would be no effect on the visual character of the area. Furthermore, the distribution of flights throughout the proposed operating area would minimize any potential for significant visual impacts at any location and any visual effects are expected to be similar to existing air traffic in the vicinity of the operating areas and not be significant. In the future, other drone operations or aviation activity may be proposed to operate with this Proposed Action's operating area. Should that occur, Prime Air understands the potential for visual impacts may increase due to the introduction of additional drone or other aviation activity and would work with operators and the FAA to mitigate potential impacts. The FAA would also conduct a new environmental analysis—including evaluating reasonably foreseeable effects on visual impacts—prior to the commencement of drone operations or other aviation activity in this area.

CHAPTER 4
List of Preparers and Agencies Consulted

4.1 Preparers

Name and Affiliation	Years of Industry Experience	EA Responsibility
FAA Evaluators		
Christopher Hurst REM, CEA, CESCO, FAA AFS (Office of Safety Standards, Flight Standards Service) General Aviation Operations	20	Environmental Protection Specialist, Document Review
Christopher Couture, FAA AQS (Aviation Safety, Quality, Integration, and Executive Services)	17	Environmental Protection Specialist, Document Review
Christopher Hobbs, FAA AEE (Office of Environment and Energy, Noise Division [AEE-100])	27	Environmental Protection Specialist, Noise Analysis and Document Review
Preparers		
Mike Arnold/ESA	34	QA/QC review
Sean Burlingame/ESA	17	NEPA documentation
Patricia Davis/ESA	4	NEPA documentation
Patrick Hickman/ESA	14	NEPA documentation
Sarah McAbee/ESA	16	NEPA documentation
Chris Nottoli/ESA	10	Noise modeling
Ted Reese/ESA	21	NEPA documentation
Susan Shaw/ESA	23	NEPA documentation
Neal Wolfe/ESA	23	Project Manager, NEPA documentation

4.2 Agencies Consulted

List of Agencies Consulted
U.S. Fish and Wildlife Service, Louisiana Ecological Services Field Office
Louisiana State Historic Preservation Office
Absentee Shawnee Tribe of Oklahoma
Caddo Nation of Oklahoma
Chitimacha Tribe of Louisiana
Coushatta Tribe of Louisiana
Jena Band of Choctaw Indians
Quapaw Nation
Seminole Tribe of Florida
Tunica-Biloxi Tribe of Louisiana

DECLARATION RELATED TO PAGE LIMITS: The FAA has considered the factors mandated by NEPA and the EA represents the FAA's good-faith effort to prioritize documentation of the most important considerations required by the statute within the congressionally mandated page limits. This prioritization reflects the FAA's expert judgment, and any considerations addressed briefly or left unaddressed were, in the FAA's judgment, comparatively not of a substantive nature that meaningfully informed the consideration of environmental effects and the resulting decision on how to proceed.

DECLARATION RELATED TO DEADLINE: The EA represents the FAA's good-faith effort to fulfill NEPA's requirements within the Congressional timeline and is substantially complete. In the FAA's expert opinion, the FAA has thoroughly considered the factors mandated by NEPA. In the FAA's judgment, the analysis contained herein is adequate to inform and reasonably explain the FAA's final decision regarding the proposed federal action.