

Appendix D
**Section 106 Resources and
Agency Consultation**

D-1 SHPO Consultation



U.S. Department
of Transportation

**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave., SW.
Washington, DC 20591

Carrie Broussard
Louisiana State Historic Preservation Officer
Office of Cultural Development
P.O. Box 44247
Baton Rouge, LA 70804-4241

Re: Concurrence with No Adverse Effect to Historic Properties for Commercial Drone Delivery Operations around Baton Rouge, LA

Ms. Broussard:

The Federal Aviation Administration (FAA) is currently evaluating a proposal from Amazon.com Services, doing business as Amazon Prime Air, to introduce drone package delivery operations at one (1) location in the Baton Rouge, LA area. The FAA has determined the proposed action, which requires FAA approvals to enable operations, is an undertaking, as defined under the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR § 800.16(y)) (Section 106). In accordance with Section 106, the FAA is requesting the State Historic Preservation Officer (SHPO) concurrence on the definitions of each Area of Potential Effect (APE) and the agency's finding of *no adverse effects* to historic properties associated with the Proposed Undertaking.

Proposed Undertaking

Prime Air is seeking authorization to conduct commercial package deliveries using drones at 1 location in and around Baton Rouge, LA. The address of this location is 9001 Cortana Place, Baton Rouge, LA 70815 (30.454724°, -91.090126°). Prime Air intends to introduce its drone delivery capabilities in 2026 and has requested the FAA to authorize the operation of its MK30 drone, so it can provide drone package delivery services across each operating area. Prime Air projects flying up to 1,000 MK30 drone flights per operating day from the identified Prime Air Drone Delivery Center (PADDC) located near the Baton Rouge metro area, with each flight taking a package to a customer delivery address before returning to the PADDC. The number of flights per day would vary based on customer demand and weather conditions. Prime Air is taking an incremental approach to operations and expects to gradually ramp up to 1,000 flights per day as consumer demand increases over time. Drone flights could be conducted up to 365 days a year between 6:00 a.m. and 10:30 p.m. The project does not include any ground-disturbing activities; therefore the following focuses on architectural historic properties.

Unmanned Aircraft

As pictured in **Attachment A**, the Prime Air MK30 drone is a hybrid multicopter fixed-wing tail-sitter drone with six propulsors allowing it to take-off and land vertically and transition to wing borne flight. Its airframe is composed of staggered tandem wings for stable wing-borne flight. The drone weighs

approximately 78 pounds and has a maximum takeoff weight of approximately 83 pounds, which includes a maximum payload of 5 pounds. It has a maximum operating range of 7.5 miles and can fly up to about 67 miles per hour (mph) during wing-borne flight. It uses electric power from rechargeable lithium-ion batteries and is launched vertically using powered lift and converts to using wing lift during en route horizontal flight. The MK30 is equipped with collision avoidance technology to help avoid conflicts with other aircraft and drones during flight.

Flight Operations

The MK30 drone would generally be operated at an altitude between 180 and 377 feet above ground level (AGL). The outbound en route altitude to a delivery location is expected to be flown between 180 and 279 feet AGL. The inbound en route altitude is expected to be flown between 279 and 377 feet back to the PADDCC. At a delivery location, the drone would descend vertically to a stationary hover and drop a package to the ground. Once a package has been delivered, the drone would ascend vertically to the inbound transition altitude and depart the delivery area while climbing to the en route altitude to return to the PADDCC. The PADDCC is a controlled area wherein drone flights are launched and recovered. The drone would fly a predefined flight path that is set prior to takeoff. Flight missions would be automatically planned by Prime Air's flight planning software, which assigns, deconflicts, and routes each flight. In accordance with FAA safety requirements, the drone would avoid operating over areas with dense human populations, such as over roadways, public gathering spots, etc.

A typical drone flight profile can be broken into the following general flight phases: takeoff, en route outbound, delivery, en route inbound, and landing, as depicted in **Attachment B**.

Takeoff

Once a package is loaded onto the MK30 drone and the drone is cleared for departure from the PADDCC, the drone takes off from the ground vertically to an altitude of about 115 feet AGL and then transitions and climbs to its en route altitude of about 200 feet AGL (ranges from 180 and 279 feet AGL). The takeoff phase of flight would last less than one minute and result in maximum noise exposure levels (L_{max}) of approximately 70 dB at a distance of 75 feet from the PADCC. These noise levels are equivalent to the noise generated from a household vacuum cleaner at a distance of 10 feet¹.

En Route Outbound

The en route outbound phase is the part of flight in which the MK30 drone transits from the PADDCC to a delivery point on a predefined flight path. During this flight phase, the drone will typically operate at an altitude of 200 feet AGL with a typical airspeed of 67 mph. Noise levels generated from enroute outbound flight would be approximately 60 dB L_{max} at a distance of 76 feet abeam the drone's flight path and are equivalent to the noise generated from normal speech at a distance of 3 feet.

Delivery

The delivery phase consists of descent from the en route altitude to a delivery point to deliver a package. The MK30 drone transitions and descends to about 140 feet AGL and then vertically descends to about 13 feet AGL while maintaining position over the delivery point. The drone hovers while dropping the package and then proceeds to climb vertically back to the inbound transition altitude of 197 feet AGL. The MK30 then transitions and climbs to its en route inbound altitude of 345 feet AGL (ranges from 279 to 377 feet AGL). The delivery phase of flight would last approximately one minute and result in noise levels of approximately 69 dB L_{max} at a distance of 75 feet from the delivery location.

These noise levels are nearly identical to those generated during takeoff and would be equivalent to a household vacuum cleaner at a distance of 10 feet.

En Route Inbound

The MK30 drone continues to fly at a typical altitude of 345 feet AGL at a speed of 67 mph towards the PADDC. Noise levels generated from enroute outbound flight would be nearly identical to those from enroute inbound flight with an Lmax of approximately 61 dB at a distance of 76 feet abeam the drone's flight path.

Landing

The drone decelerates as it approaches the PADDC and descends to the transition altitude of 197 feet AGL and where it transitions from horizontal flight to vertical flight, coming to a zero-speed position over its assigned landing pad. The MK30 drone slowly vertically descends over its assigned landing pad and lands on the pad. Noise levels generated from landing would be nearly identical to those generated from takeoff with an Lmax of approximately 70 dB at a distance of 75 feet from the PADCC.

Area of Potential Effects

In accordance with 36 CFR § 800.4(a)(1), the FAA has defined the APE in consideration of the undertaking's potential direct and indirect effects. The proposed APE is the drone operating area associated with the PADDC, as outlined in red in **Attachment C**. The APE encompasses a 7.5-mile radius operational area centered at the PADDC and encompasses approximately 175 square miles. The total acreage within the APE is approximately 115,082 acres.

Identification of Historic Properties

To identify historic properties within the APE, the FAA cross referenced the most recent versions of the National Register of Historic Places (National Register) Database and Federal Determinations of Eligibility (DOE) Database with the information available through the HP Cultural Resources Map.² Where possible, numbers of district contributors were verified through review of publicly available documentation (National Register nominations or local survey documentation) accessible through the National Register Database. In a small number of cases where locational information was vague or missing, some information such as location verification was completed with assistance from Google Earth and the internet.

Following this methodology, 16 historic districts with a total of approximately 1,975 contributing features, 71 individual historic properties, and 2 National Historic Landmarks were identified within the APE. Based on the available information, this results in a total of 2,064 historic properties across all resource types. A list of identified historic properties is provided in **Attachment D**.

Assessment of Effects

Given the small size of the MK30 drone and predicted sound levels, operations would not produce vibrations that could impact the architectural structure or contents of any structure in the proposed APEs. While the MK30 drone is not expected to generate significant noise levels at or within any historic property, the FAA considered drone delivery noise and potential visual effects on historic properties where a quiet setting or visually unimpaired sky might be a key attribute of the property's significance.

Predicted Sound Levels

Based on a noise analysis using sound level measurement data for the MK30 drone, the estimated maximum sound exposure level (SEL) for the takeoff, delivery, and landing phases of flight is

approximately 90.5 (at 20 feet), 92.1 (at 25 feet), and 91.8 dB (at 20 feet), respectively (see **Attachment E**). Predicted sound levels decrease as distances from the drone increase. The maximum SEL for the en route phase is approximately 63.7 dB when the drone at an altitude of 200 feet AGL and flying at approximately 67 mph.

Based on the anticipated average daily maximum of 1,000 deliveries provided by Prime Air for each PADDCC, with 100 of the 1,000 daily deliveries (10%) occurring during the period from 6:00 a.m. to 7:00 a.m. and 10:00 p.m. to 10:30 p.m., a Day-Night Average Sound Level (DNL) of 65 dB could extend up to 150 feet from each PADDCC, which would then decrease as the distance from each PADCC increases. Because the beginning and ending portions of the operational timeframe occur during hours considered part of a nighttime period (defined as between 10:00 p.m. and 7:00 a.m.) the noise analysis includes a 10 dB penalty which is applied to the 100 operations that are anticipated to occur from 6:00 a.m. to 7:00 a.m. and 10:00 p.m. to 10:30 p.m. During these operational periods, 1 nighttime operation is considered equivalent to 10 daytime operations consistent with calculation of the DNL noise metric. 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.³

The drone is expected to typically fly the same outbound flight path between PADDCCs and delivery points and inbound flight path back to the PADDCCs. While the total average daily deliveries from each PADCC is 1,000, the number of overflights in a day will be dispersed because PADCCs are centrally located in each proposed operating area and delivery locations would be distributed throughout the proposed operating areas. 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 PADCCs during the period from 6:00 a.m. to 7:00 a.m. and from 10:00 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. It was conservatively assumed that when two or more MK30 drone operating areas overlap, overflights associated with an additional 950 daytime equivalent deliveries would be estimated, per operating area overlap. Based on these assumptions, en route noise levels could reach up to DNL 46.0 dB in any location within the action area, and for areas with two overlapping operating areas, the estimated en route noise levels could reach up to 48.9 dB, respectively.

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 each 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 6:00 a.m. and 7:00 a.m. and 10:00 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 PADDCC. Based on the maximum distribution of deliveries that could occur at a single delivery location in each operating area, the resulting noise exposure at a distance of 125 feet⁴ from deliveries

would not be expected to exceed DNL 50.1 dB, even in instances where there is overlap between two PADCC operating areas.

Potentially Sensitive Historic Properties

Within 0.5 miles of a PADCC

The area most likely to experience visual or auditory effects resulting from the undertaking are in close proximity to the PADCC. In this area, 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 miles of the PADCCs. Beyond 0.5 miles, drone operation would be more dispersed and at elevations well above typical visual line-of-sight.

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 that are parks, religious institutions, cemeteries, or have significance that is partially based on a quiet or pre-industrial setting.

Assessment of Effects

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 the Draft Environmental Assessment are suitable for the evaluation of Federal actions in compliance with the National Environmental Policy Act (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 results presented above are expressed in terms of the DNL, considering varying levels of operations for areas at ground level below each flight phase.

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 miles 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 proposes a *Finding of No Adverse Effect* for this undertaking.

Conclusion

The FAA requests your concurrence on the definition of the proposed APE and with the FAA's finding of *no adverse effects* from the Proposed Undertaking.

Your response within the next 30 days will greatly assist us in our environmental review process. If you would like to consult with the FAA about this undertaking, please contact Christopher Hurst via email at 9-faa-drone-environmental@faa.gov.

Sincerely,

Joseph K. Hemler Jr

Digitally signed by Joseph K.

Hemler Jr

Date: 2026.04.09 14:12:00 -04'00'

Joseph Hemler

Manager, General Aviation and Commercial Branch (AFS-752) Emerging Technologies Division
Office of Safety Standards, Flight Standards Service

Enclosures:

Attachment A – Amazon Prime Air MK30 Drone

Attachment B – MK30 Drone Flight Profile

Attachment C – Proposed Area of Potential Effect

Attachment D – Identified Historic Properties

Attachment E – Technical Noise Report

Attachment A
Amazon Prime Air MK30 Drone



Amazon Prime Air MK30 Drone

Weight – 78 lbs.

Payload – 5 lbs.

Cruise Speed – 62 mph

Ceiling – 400 ft

Range – 7.5 mi (15 min)

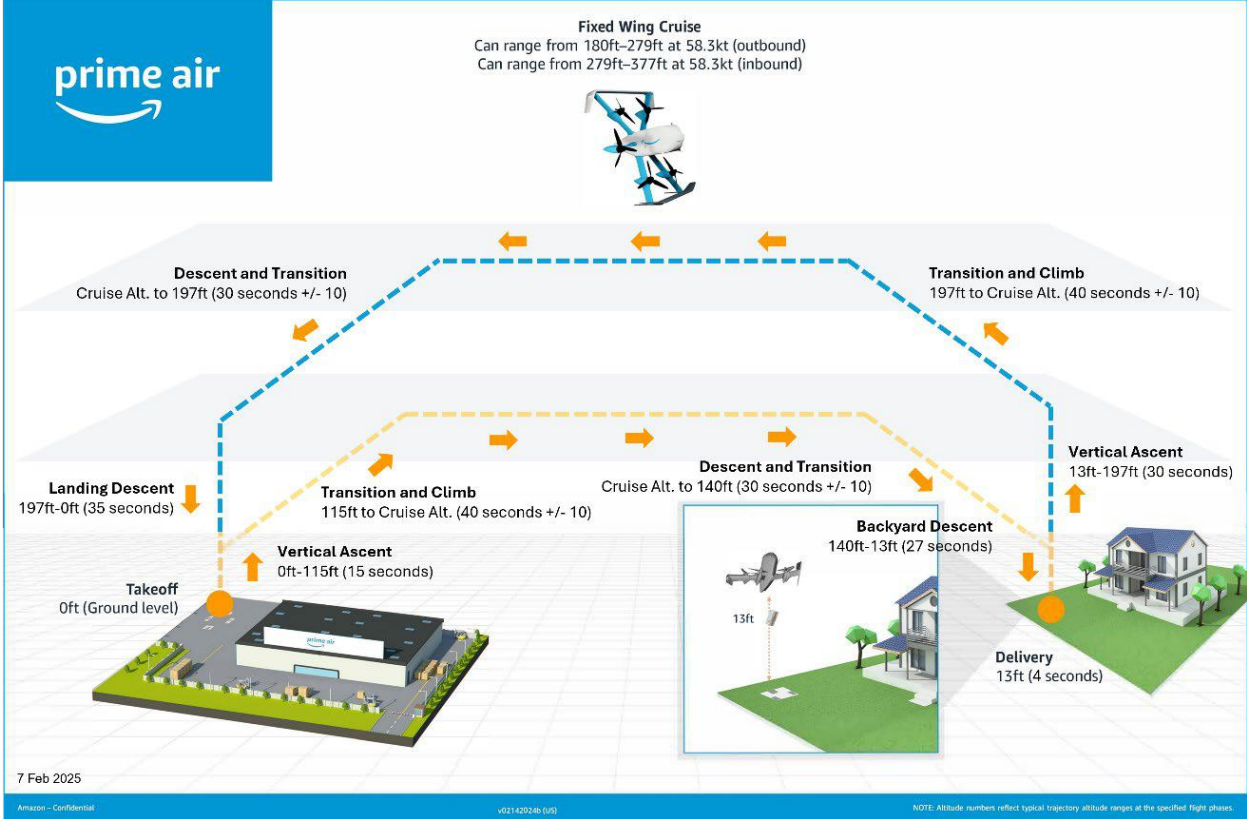
Operations – 365,000/yr (1,000/day)

Operating Times – 6am – 10:30pm

Electrically powered

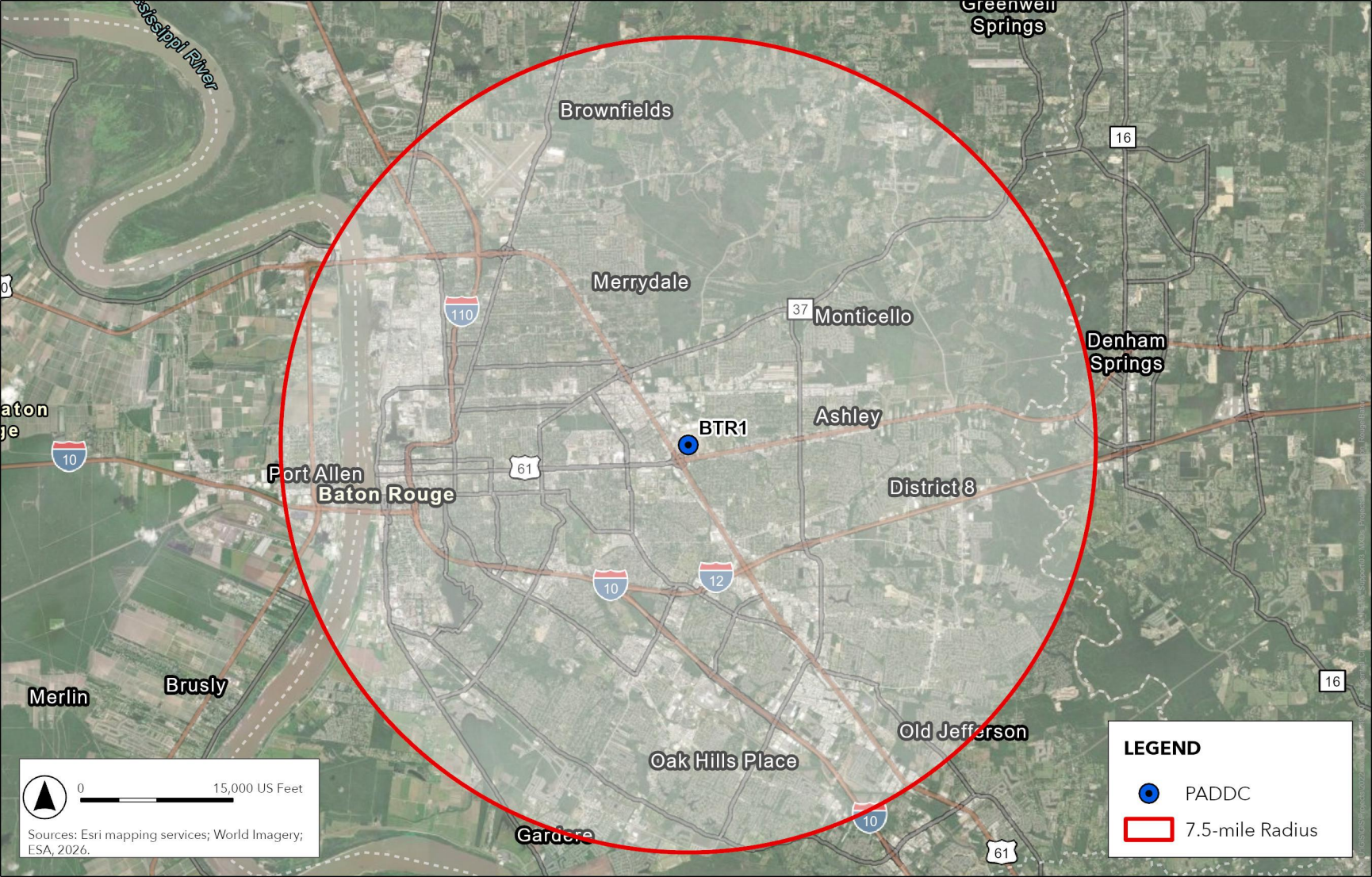
Operate from a PADDC – Prime Air Drone Delivery Center

Attachment B
MK30 Drone Flight Profile



MK30 Drone Flight Profile

Attachment C
Proposed Areas of Potential Effects



Brownfields

Merrydale

Port Allen
Baton Rouge

BTR1

Monticello

Ashley

District 8

Oak Hills Place

Old Jefferson

Gardere

Brusly

Merlin

16

110

61

10

12


37

10

16

LEGEND

 PADDC

 7.5-mile Radius

0 15,000 US Feet

Sources: Esri mapping services; World Imagery; ESA, 2026.

Attachment D
Listed and Eligible NHRP Resources

Table D-1: Historic Properties within the BRT1 APE

Resource Name	Type	City	Parrish	Status (Eligible/Listed)	District Contributors
Aillet House	Building	Port Allen	West Baton Rouge	Listed	
Barthel Pigeonnier	Building	Baton Rouge	East Baton Rouge	Listed	
Baton Rouge Electric Company (BRECO) Public Utilities Complex	District	Baton Rouge	East Baton Rouge	Listed	n/a
Baton Rouge High School	Building	Baton Rouge	East Baton Rouge	Listed	
Baton Rouge Junior High School	Building	Baton Rouge	East Baton Rouge	Listed	
Baton Rouge National Cemetery	Site	Baton Rouge	East Baton Rouge	Listed	
Baton Rouge Savings and Loan Association	Building	Baton Rouge	East Baton Rouge	Listed	
Baton Rouge Waterworks Company Standpipe	Structure	Beauregard Town	East Baton Rouge	Listed	
Beauregard Town Historic District (Including Boundary Increases)	District	Baton Rouge	East Baton Rouge	Listed	512
Belisle Building	Building	Baton Rouge	East Baton Rouge	Listed	
Borden Dairy	Building	Baton Rouge	East Baton Rouge	Listed	
Broussard House	Building	Baton Rouge	East Baton Rouge	Listed	
Campbell Apartment Building	Building	Baton Rouge	East Baton Rouge	Listed	
Capital City Press Building	Building	Baton Rouge	East Baton Rouge	Listed	
Central Fire Station	Building	Baton Rouge	East Baton Rouge	Listed	
City Park Golf Course	District	Baton Rouge	East Baton Rouge	Listed	3
D'Agostino Building	Building	Port Allen	West Baton Rouge	Listed	
Downtown Baton Rouge Historic District	District	Baton Rouge	East Baton Rouge	Listed	26
Drehr Place Historic District	District	Baton Rouge	East Baton Rouge	Listed	89
Dufrocq School	Building	Baton Rouge	East Baton Rouge	Listed	
East Baton Rouge Parish Library	Building	Baton Rouge	East Baton Rouge	Listed	
Florence Coffee House	Building	Baton Rouge	East Baton Rouge	Listed	
Fuqua Hardware Store Building	Building	Baton Rouge	East Baton Rouge	Listed	
Governor's Mansion	Building	Baton Rouge	East Baton Rouge	Eligible	
Gracelane Plantation	Building	Baton Rouge	East Baton Rouge	Listed	
Hart House	Building	Baton Rouge	East Baton Rouge	Listed	
Heidelberg Hotel	Building	Baton Rouge	East Baton Rouge	Listed	
Heidelberg Hotel and Hotel King (Boundary Increase)	Building	Baton Rouge	East Baton Rouge	Listed	
Homestead Plantation	Building	Port Allen	West Baton Rouge	Listed	
Hundred Oaks Residential	District	Baton Rouge	East Baton Rouge	Eligible	n/a
Kean's Apartment Building	Building	Baton Rouge	East Baton Rouge	Listed	
Kleinert Terrace Historic District	District	Baton Rouge	East Baton Rouge	Listed	142
Kleinpeter House (Cemetery)	Building	Baton Rouge	East Baton Rouge	Listed	

Table D-1: Historic Properties within the BRT1 APE

Resource Name	Type	City	Parrish	Status (Eligible/Listed)	District Contributors
Kleinpeter, John and Amelia Sharp, House	Building	Baton Rouge	East Baton Rouge	Listed	
Knox Building	Building	Baton Rouge	East Baton Rouge	Listed	
Kress Building	Building	Baton Rouge	East Baton Rouge	Listed	
Landry, Kenneth C. and Carolyn B., House	Building	Baton Rouge	East Baton Rouge	Listed	
Laurel Street Fire Station	Building	Baton Rouge	East Baton Rouge	Listed	
Lincoln Theater	Building	East Baton Rouge	East Baton Rouge	Listed	
Louisiana State Capitol Building and Gardens	Building	Baton Rouge	East Baton Rouge	Listed	
Louisiana State University, Baton Rouge (Including Boundary Increase)	District	Baton Rouge	East Baton Rouge	Listed	46
Magnolia Cemetery	Site	Baton Rouge	East Baton Rouge	Listed	
Magnolia Mound Plantation Dependency	Building	Baton Rouge	East Baton Rouge	Listed	
Magnolia Mound Plantation House	Building	Baton Rouge	East Baton Rouge	Listed	
Main Street Historic District	District	Baton Rouge	East Baton Rouge	Listed	12
Manship House	Building	Baton Rouge	East Baton Rouge	Listed	
McKinley High School	Building	Baton Rouge	East Baton Rouge	Listed	
Monte Vista Plantation House	Building	Port Allen	West Baton Rouge	Listed	
Mount Hope Plantation House	Building	Baton Rouge	East Baton Rouge	Listed	
Nicholson School	Building	Baton Rouge	East Baton Rouge	Listed	
Ogden Park	District	Baton Rouge	East Baton Rouge	Eligible	n/a
Old Louisiana Governor's Mansion	Building	Baton Rouge	East Baton Rouge	Listed	
Old Louisiana State Capitol	Building	Baton Rouge	East Baton Rouge	NHL	
Old Post Office	Building	Baton Rouge	East Baton Rouge	Listed	
Old South Baton Rouge	District	Baton Rouge	East Baton Rouge	Eligible	n/a
Olinde Building	Building	Baton Rouge	East Baton Rouge	Listed	
Pecue House	Building	Baton Rouge	East Baton Rouge	Listed	
Pentagon Barracks	Building	Baton Rouge	East Baton Rouge	Listed	
Petitpierre-Kleinpeter, Joseph, House	Building	Baton Rouge	East Baton Rouge	Listed	
Planter's Cabin	Building	Baton Rouge	East Baton Rouge	Listed	
Poplar Grove Plantation House	Building	Port Allen	West Baton Rouge	Listed	
Port Allen High School	Building	Port Allen	West Baton Rouge	Listed	
Potts House	Building	Baton Rouge	East Baton Rouge	Listed	
Powder Magazine	Building	Baton Rouge	East Baton Rouge	Listed	
Prince Hall Masonic Temple	Building	Baton Rouge	East Baton Rouge	Listed	

Table D-1: Historic Properties within the BRT1 APE

Resource Name	Type	City	Parrish	Status (Eligible/Listed)	District Contributors
Rabalais House	Building	Baton Rouge	East Baton Rouge	Listed	
Reiley-Reeves House	Building	Baton Rouge	East Baton Rouge	Listed	
Reymond House	Building	Baton Rouge	East Baton Rouge	Listed	
Robinson, Eddie Sr., Historic District	District	Baton Rouge	East Baton Rouge	Listed	580
Roseland Terrace Historic District	District	Baton Rouge	East Baton Rouge	Listed	302
Roumain Building	Building	Baton Rouge	East Baton Rouge	Listed	
S.Helly O'Neil Homesites	District	Debhan Springs	East Baton Rouge	Eligible	n/a
Sanders, Jared Young, Jr., House	Building	Baton Rouge	East Baton Rouge	Listed	
Scott Street School	Building	Baton Rouge	East Baton Rouge	Listed	
Southern University Historic District (Including Boundary)	District	Baton Rouge	East Baton Rouge	Listed	5
Spanish Town	District	Baton Rouge	East Baton Rouge	Listed	258
St. James Episcopal Church	Building	Baton Rouge	East Baton Rouge	Listed	
St. Joseph Cathedral	Building	Baton Rouge	East Baton Rouge	Listed	
Stewart-Dougherty House	Building	Baton Rouge	East Baton Rouge	Listed	
Stone Square Lodge No. 8	Building	Port Allen	West Baton Rouge	Listed	
Tessier Buildings	Building	Baton Rouge	East Baton Rouge	Listed	
U.S.S. KIDD	Structure	Baton Rouge	East Baton Rouge	NHL	
Union Federal Savings and Loan Association	Building	Baton Rouge	East Baton Rouge	Listed	
US Post Office and Courthouse-Baton Rouge	Building	Baton Rouge	East Baton Rouge	Listed	
Warden's House-Old Louisiana State Penitentiary	Building	Baton Rouge	East Baton Rouge	Listed	
Welsh-Levy Building	Building	Baton Rouge	East Baton Rouge	Listed	
Winans, Fonville, Studio	Building	Baton Rouge	East Baton Rouge	Listed	
Wooddale Tower	Building	Baton Rouge	East Baton Rouge	Listed	
Yazoo and Mississippi Valley Railroad Company Depot	Building	Baton Rouge	East Baton Rouge	Listed	

Total Historic Districts	16
Total District Contributors	1,975
Total National Historic Landmarks	2
Total Individual Historic Properties	71
Total Historic Resources	2,064

Attachment E
Technical Noise Report

The Technical Noise Report included in the original agency consultation has been omitted from this appendix, but can be found in Appendix E.

D-2 Tribal Consultation



U.S. Department
of Transportation

**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave., SW.
Washington, DC 20591

Governor John Johnson
Absentee Shawnee Tribe of Indians of Oklahoma
2025 S. Gordon Cooper Dr.
Shawnee, OK 74801

Transmitted via e-mail and mail: jjohnson@astribe.com

RE: Invitation for Government-to-Government Tribal Consultation for Drone Package Delivery Operations in Louisiana

Dear Governor Johnson,

The purpose of this letter is to initiate formal government-to-government consultation regarding a proposal under consideration by the Federal Aviation Administration (FAA) to authorize commercial Unmanned Aircraft Systems (UAS) operators to deliver goods to customers (referred to as package delivery) using unmanned aircraft (also referred to as drones) in accordance with 14 Code of Federal Regulations Part 135 (Part 135) in the state of Louisiana. The FAA is the lead federal agency for government-to-government consultation for the proposed project. Amazon.com Services LLC, doing business as Amazon Prime Air, is the proponent of the project. We wish to solicit your views regarding potential effects on tribal interests in the area.

The primary purpose of government-to-government consultation is to ensure that Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect the Tribes. This policy is provided in Federal Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*; Presidential Memorandum, *Uniform Standards for Tribal Consultation*; DOT Order 5301.1A, *Department of Transportation Tribal Consultation Policy and Procedures*; and FAA Order 1210.20, *American Indian and Alaska Native Tribal Consultation Policy and Procedures*.

Consultation Initiation

With this letter, the FAA is seeking input concerning any Tribal lands or sites of religious or cultural significance that may be affected by the proposed operation. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources. We are available to discuss the details of the proposed project with you.

Proposed Activity Description

The FAA is preparing an Environmental Assessment to assess the potential environmental impacts of commercial package delivery operations using drones in the Baton Rouge, LA metro area under Part

135. Since 2019, the FAA has been issuing air carrier certificates to UAS operators in accordance with Part 135 so that operators can conduct package delivery flights. Generally, these approvals are associated with issuing a new or amended Part 135 air carrier Operations Specifications as the operative approval. For your reference, the project description used for consultation under Section 106 is enclosed with this letter.

Confidentiality

We understand that you may have concerns about the confidentiality of information on areas or resources of traditional, religious, and cultural importance to your Tribe. We are available to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

FAA Contact Information

We anticipate that this letter will arrive by regular mail no later than April 24, 2026. Your timely response over the next 30 days will greatly assist us in incorporating your concerns into our environmental review of the operation. In addition, we respectfully request your response in the event that the Absentee Shawnee Tribe of Indians of Oklahoma would like to consult with the FAA in a government-to-government relationship about this proposal. Please contact Christopher Hurst via email at 9-faa-drone-environmental@faa.gov within 30 days of receipt of this letter to confirm your intent to participate in this government-to-government consultation.

Sincerely,

Enclosure:

Attachment A – Section 106 Consultation Package

CC: Mr. Jeff Harjo
Tribal Historic Preservation Officer

RE: Invitation for Government-to-Government Tribal Consultation for Drone Package Delivery Operations in Louisiana

**DEREK W
HUFTY**

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-04'00'

Derek Hufty
Manager, General Aviation and Commercial Branch (AFS-750)
Emerging Technologies Division
Office of Safety Standards, Flight Standards Service

Attachment A
Section 106 Consultation Package



U.S. Department
of Transportation

**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave., SW.
Washington, DC 20591

Mr. Jeff Harjo
Tribal Historic Preservation Officer
Absentee Shawnee Tribe of Indians of Oklahoma
2025 S. Gordon Cooper Dr.
Shawnee, OK 74801

Transmitted via e-mail and mail: 106NAGPRA@astribe.com; [jacobell@astribe.com](mailto:jcobell@astribe.com)

Dear Mr. Harjo,

The Federal Aviation Administration (FAA) is currently evaluating Amazon Prime Air's proposal to conduct commercial drone delivery operations in the Baton Rouge metro area. Amazon Prime Air must obtain approval from the FAA prior to introducing operations and operating the MK30 drone. The FAA has determined that its proposed action, which would encompass all FAA approvals necessary to enable operations, is an undertaking as defined under the regulations implementing Section 106 of the National Historic Preservation Act (NHPA) (36 CFR § 800.16(y)). The purpose of this letter is to initiate Section 106 consultation with the Absentee Shawnee Tribe of Indians of Oklahoma and to solicit your views regarding potential effects on tribal interests in the area. The FAA has begun an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) to analyze the proposed action. FAA intends to complete consultation for Section 106 of the NHPA concurrently with the NEPA process.

Project Description

Amazon Prime Air is proposing to transport consumer goods via drone delivery in the communities around Baton Rouge, LA by using the MK30 drone. The MK30 drone would take off from a Prime Air Drone Delivery Center (PADDC), which has already been constructed, and quickly rise to a cruising altitude of between 180 to 377 feet above ground level (AGL). The MK30 drone weighs approximately 87 pounds and can transport a small package up to about 5 pounds. The MK30 drone has an approximate 7.5-mile service radius. Once at the delivery site, the MK30 drone hovers in place at about 13 feet AGL and drops the package to the ground. Once the package has been delivered, the drone flies back to the PADDC at roughly the same altitude.

Amazon Prime Air is proposing up to 1,000 MK30 drone flights per day from a proposed PADDC located in the Baton Rouge metro area, with each flight taking a package to a customer delivery address before returning. There is variability in the number of flights per day based on customer demand and weather conditions. Initially, Amazon Prime Air expects to fly much less than 1,000 flights per day from each PADDC and gradually ramp up to the proposed level as consumer demand increases. Drone flights are planned to occur up to 365 days a year, with operations being conducted between 6:00 A.M. and 10:30 P.M. There are no ground disturbing activities associated with this proposed action.

Area of Potential Effects

In accordance with 36 CFR § 800.4(a)(1), the FAA has defined the Area of Potential Effects (APE) in consideration of the undertaking's potential direct and indirect effects. The proposed APE consists of a 15-mile diameter circle centered on the Baton Rouge metropolitan area, which is densely congested and populated. The APE has been coordinated with the Louisiana State Historic Preservation Office (SHPO) and PADD operations are only expected to occur within the proposed 15-mile APE. The enclosed map (see **Attachment A**) shows the proposed APE in detail.

Identification of Historic Properties

The proposed undertaking does not have the potential to affect below ground or archeological resources because the undertaking does not include ground disturbance but could result in auditory or visual effects. Therefore, the FAA focused its identification efforts on above-ground historic properties.

Consultation


The FAA is now soliciting the opinion of the tribes concerning any tribal lands, or sites of religious or cultural significance that may be affected by the proposed operations area. We anticipate that this letter will arrive by regular mail no later than April 24, 2026. Your response over the next 30 days will greatly assist us in incorporating your concerns into our environmental review of the operation. If you have any questions or need additional information, please contact Christopher Hurst via email at 9-faa-drone-environmental@faa.gov within 30 days of receipt of this letter.

Sincerely,

Enclosure:
Attachment A – Proposed Area of Potential Effects

RE: Invitation for Section 106 of the National Historic Preservation Act Tribal Consultation for Drone Package Delivery Operations in Louisiana

**DEREK W
HUFTY**

 Digitally signed by DEREK W
HUFTY
Date: 2026.04.07 08:23:10
-04'00'

Derek Hufty
Manager, General Aviation and Commercial Branch (AFS-750)
Emerging Technologies Division
Office of Safety Standards, Flight Standards Service

Attachment A
Proposed Areas of Potential Effects



Absentee Shawnee Tribe of Indians of Oklahoma
Tribal Historic Preservation Department
2025 S. Gordon Cooper Dr.
Shawnee, Oklahoma 74801
Phone: (405) 275-4030 ext. 6243

April 13, 2026

RE: Invitation for Government-to-Government Tribal Consultation for Drone Package Delivery Operations in Louisiana

To Whom It May Concern:

My name is Julee Cobell; and I am the Tribal Historic Preservation Officer Specialist for the federally-recognized *Absentee Shawnee Tribe of Indians of Oklahoma*. In this capacity, I am the Absentee Shawnee Tribe's point of contact for all Section 106 projects or concerns. Our office received your letter on 4/13/2026, regarding the above-referenced project in East Baton Rouge Parish, LA.

After research through our database and files, and review of this information, we find no interest in this project as it is outside of our area of interest. We defer comment to your office, as well as, to the SHPO and/or State Archaeologist.

Thank you for contacting the *Absentee Shawnee Tribe of Indians of Oklahoma*; we appreciate your time, cooperation and communication regarding Section 106.

Best Regards,

Julee Cobell
Tribal Historic Preservation Officer Specialist
Absentee Shawnee Tribe of Oklahoma
106NAGPRA@astribe.com
jcobell@astribe.com
(405) 275-4030 ext. 3527

From: [9-FAA-Drone-Environmental \(FAA\)](#)
To: [Neal Wolfe](#)
Cc: [Fitzpatrick, Jim](#); [Hurst, Christopher A \(FAA\)](#)
Subject: FW: Amazon Prime Air Louisiana
Date: Monday, May 11, 2026 10:58:14 AM
Attachments: [Outlook - 20260511105814.png](#)

From: LaCinda Attocknie <LaCinda.Attocknie@quapawnation.com>
Sent: Wednesday, May 6, 2026 8:07 AM
To: 9-FAA-Drone-Environmental (FAA) <9-FAA-Drone-Environmental@faa.gov>
Cc: section 106 <section.106@quapawnation.com>
Subject: Amazon Prime Air Louisiana

You don't often get email from lacinda.attocknie@quapawnation.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Partner,

The Quapaw Nation Historic Preservation Program (QHPP) has received and reviewed the information provided for the proposed Amazon Prime Air Louisiana in Baton Rouge, Louisiana.

After reviewing this project, we have determined that it is not located within our tribal area of interest; therefore, we decline comment on this project. We also request that we be removed from your agencies' list of tribes that wish to consult on undertakings for this particular county.

Thank you for updating your records and for contacting the Quapaw Nation. Should you have any questions or need any additional information regarding this project please contact LaCinda Attocknie at LaCinda.Attocknie@quapawnation.com, please copy section.106@quapawnation.com. Thank you for consulting with the Quapaw Nation on this matter.

Sincerely,

LaCinda Attocknie
QHPP Compliance Specialist
Quapaw Nation
P.O Box 765
Quapaw, OK 74363
(918) 238-3100 ext. 6119



