

D-2 Tribal Consultation



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave., SW.
Washington, DC 20591

President Michael McLane
Delaware Nation
P.O. Box 825
Anadarko, OK 73005

Transmitted via e-mail and mail: mmclane@delawarenation-nsn.gov

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

Dear President McLane,

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 Illinois. 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 Chicago, IL 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 March 20, 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 Delaware Nation 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: Ms. Katelyn Lucas
Tribal Historic Preservation Officer

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

**DEREK W
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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

Katelyn Lucas
Tribal Historic Preservation Officer
Delaware Nation
P.O. Box 825
Anadarko, OK 73005

Transmitted via e-mail and mail: klucas@delawarenation-nsn.gov

Dear Ms. Lucas,

The Federal Aviation Administration (FAA) is currently evaluating Amazon Prime Air's proposal to conduct commercial drone delivery operations in the Chicago, IL 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 (36 CFR § 800.16(y)). The purpose of this letter is to initiate Section 106 consultation with the Delaware Nation 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 Chicago, IL 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 four proposed PADDCs located throughout the Chicago 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 APEs consist of a 7.5-mile operating radius from each of the four PADDs located in the greater Chicago metropolitan area, which is densely congested and populated. The APEs have been coordinated with the Illinois SHPO and PADD operations are only expected to occur within the proposed APEs. The enclosed map (see **Attachment A**) shows the proposed APEs 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 March 20, 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

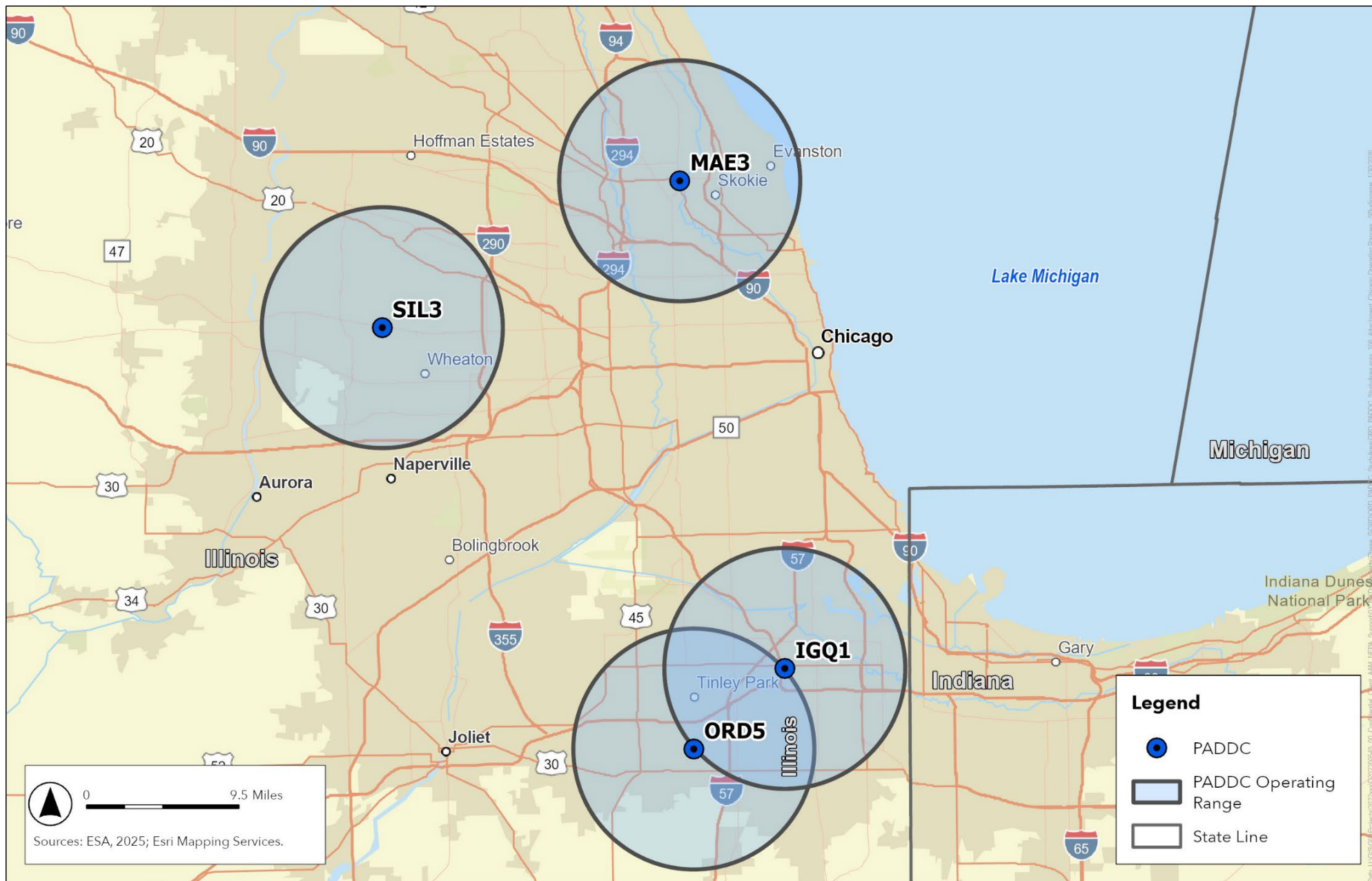
RE: Invitation for Section 106 of the National Historic Preservation Act Tribal Consultation for Drone Package Delivery Operations in Illinois

**DEREK W
HUFTY**

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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





Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355
Ph: (918) 541-1300 • Fax: (918) 542-7260
www.miamination.com



Via email: 9-FAA-Drone-Environmental@faa.gov

April 16, 2026

Chris Hurst
Environmental Protection Specialist
U.S. Federal Aviation Administration, AFS-752
General Aviation and Commercial Branch
Emerging Technologies Division
800 Independence Ave., SW.
Washington, DC 20591

Re: Amazon IGQ1 Drone Delivery – Comments of the Miami Tribe of Oklahoma

Dear Mr. Hurst:

Aya, kweehsitoolaanki – I show you respect. The Miami Tribe of Oklahoma, a federally recognized Indian tribe with a Constitution ratified in 1939 under the Oklahoma Indian Welfare Act of 1936, respectfully submits the following comments regarding Amazon IGQ1 Drone Delivery .

The Miami Tribe offers no objection to the above-referenced project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Illinois, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case please contact me at 918-541-7885 or by email at THPO@miamination.com to initiate consultation.

The Miami Tribe requests to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer, I am the point of contact for all Section 106 consultation.

Respectfully,

Logan York

Logan York
Tribal Historic Preservation Officer



Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355
Ph: (918) 541-1300 • Fax: (918) 542-7260
www.miamination.com



Via email: 9-FAA-Drone-Environmental@faa.gov

April 16, 2026

Chris Hurst
Environmental Protection Specialist
U.S. Federal Aviation Administration, AFS-752
General Aviation and Commercial Branch
Emerging Technologies Division
800 Independence Ave., SW.
Washington, DC 20591

Re: Amazon MAE3 Drone Delivery – Comments of the Miami Tribe of Oklahoma

Dear Mr. Hurst:

Aya, kweehsitoolaanki – I show you respect. The Miami Tribe of Oklahoma, a federally recognized Indian tribe with a Constitution ratified in 1939 under the Oklahoma Indian Welfare Act of 1936, respectfully submits the following comments regarding Amazon MAE3 Drone Delivery .

The Miami Tribe offers no objection to the above-referenced project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Illinois, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case please contact me at 918-541-7885 or by email at THPO@miamination.com to initiate consultation.

The Miami Tribe requests to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer, I am the point of contact for all Section 106 consultation.

Respectfully,

Logan York

Logan York
Tribal Historic Preservation Officer



Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355
Ph: (918) 541-1300 • Fax: (918) 542-7260
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Via email: 9-FAA-Drone-Environmental@faa.gov

April 16, 2026

Chris Hurst
Environmental Protection Specialist
U.S. Federal Aviation Administration, AFS-752
General Aviation and Commercial Branch
Emerging Technologies Division
800 Independence Ave., SW.
Washington, DC 20591

Re: Amazon ORD5 Drone Delivery – Comments of the Miami Tribe of Oklahoma

Dear Mr. Hurst:

Aya, kweehsitoolaanki – I show you respect. The Miami Tribe of Oklahoma, a federally recognized Indian tribe with a Constitution ratified in 1939 under the Oklahoma Indian Welfare Act of 1936, respectfully submits the following comments regarding Amazon ORD5 Drone Delivery .

The Miami Tribe offers no objection to the above-referenced project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Illinois, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case please contact me at 918-541-7885 or by email at THPO@miamination.com to initiate consultation.

The Miami Tribe requests to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer, I am the point of contact for all Section 106 consultation.

Respectfully,

Logan York

Logan York
Tribal Historic Preservation Officer



Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355
Ph: (918) 541-1300 • Fax: (918) 542-7260
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Via email: 9-FAA-Drone-Environmental@faa.gov

April 16, 2026

Chris Hurst
Environmental Protection Specialist
U.S. Federal Aviation Administration, AFS-752
General Aviation and Commercial Branch
Emerging Technologies Division
800 Independence Ave., SW.
Washington, DC 20591

Re: Amazon SIL3 Drone Delivery – Comments of the Miami Tribe of Oklahoma

Dear Mr. Hurst:

Aya, kweehsitoolaanki – I show you respect. The Miami Tribe of Oklahoma, a federally recognized Indian tribe with a Constitution ratified in 1939 under the Oklahoma Indian Welfare Act of 1936, respectfully submits the following comments regarding Amazon SIL3 Drone Delivery .

The Miami Tribe offers no objection to the above-referenced project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Illinois, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case please contact me at 918-541-7885 or by email at THPO@miamination.com to initiate consultation.

The Miami Tribe requests to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer, I am the point of contact for all Section 106 consultation.

Respectfully,

Logan York

Logan York
Tribal Historic Preservation Officer



Pokégnek Bodéwadmik

POKAGON BAND OF POTAWATOMI
HISTORY & CULTURE CENTER

03/23/2026

Christopher Hurst
800 Independence Avenue
Washington
D.C.
20591

9-FAA-Drone-Environmental@faa.gov

Amazon Prime Air Commercial Drone Delivery Operations – Chicago, IL

Dear Responsible Party:

Migwêthh for contacting me regarding this project. As THPO, I am responsible for handling Section 106 Consultations on behalf of the tribe. I am writing to inform you that I have reviewed the details for the project referenced above. The proposed work is occurring within a mile of known archaeological sites, historic sites or features that are considered sensitive or recorded in the Pokagon Band Historic Inventory Database. I have made the determination that the project will have **No Adverse Effect** on any historic, religious, or culturally significant resources to the Pokagon Band of Potawatomi Indians.

If any cultural or archaeological resources are uncovered during construction, please stop work, and contact me immediately. Should you have any other questions, please don't hesitate to contact me at your earliest convenience.

Sincerely,

Matthew J.N. Bussler
Tribal Historic Preservation Officer
Pokagon Band of Potawatomi Indians
Office: (269) 462-4316
Cell: (269) 519-0838
Matthew.Bussler@Pokagonband-nsn.gov