

Appendix G

Coastal Resources



U.S. Department
of Transportation

**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave., SW.
Washington, DC 20591

Illinois Department of Natural Resources
Coastal Management Program Office
160 N. LaSalle Street, Suite S-703
Chicago, IL 60601

Via electronic submission to: eric.otto@illinois.gov and dnr.cmp@illinois.gov

Re: Consistency Determination for Commercial Drone Delivery Operations in Illinois

The Federal Aviation Administration (FAA) is currently evaluating a proposal from Amazon.com Services, doing business as Prime Air, to introduce drone package delivery operations at four locations in the state of Illinois (the Proposed Action). The FAA has determined the Proposed Action, which requires FAA approvals to enable drone operations, is a federal action, as defined under the regulations implementing the Coastal Zone Management Act (CZMA) as amended, 16 U.S.C. Sections 1451-14664. The purpose of this letter is to coordinate with the Illinois Coastal Management Program (ICMP) and request the ICMP's concurrence that the Proposed Action complies with Illinois' approved coastal management program and will be conducted in a manner consistent with such policies.

The FAA is currently preparing a Draft Environmental Assessment (EA) to evaluate the potential environmental impacts that may result from the FAA's approval of the Proposed Action. The FAA is preparing this Draft EA pursuant to the National Environmental Policy Act of 1969 (NEPA). 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.

As required by NEPA and FAA Order 1050.1G, the FAA is currently consulting with the following parties:

- U.S. Fish & Wildlife Service (USFWS), in accordance with Section 7 of the Endangered Species Act, to consider the Proposed Action's potential to jeopardize any proposed, threatened, or endangered species or proposed or designated critical habitat.
- Illinois State Historic Preservation Office (SHPO), in accordance with Section 106 of the National Historic Preservation Act, to consider the Proposed Action's potential direct and indirect effects to resources that are listed or eligible to be listed on the National Register of Historic Places.
- Federally Recognized Tribes in Illinois, in accordance with 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, to ensure they are provided the opportunity to provide meaningful and timely input regarding the Proposed Action.

The Proposed Action does not involve the issuance of a state or federal grant, nor does it involve the issuance of a license or permit.

Proposed Action

Prime Air is seeking FAA authorization to conduct commercial package deliveries using drones at four locations in the state of Illinois (the proposed federal action). 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 each of the four Prime Air Drone Delivery Centers (PADDCs), 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 four proposed drone operating areas are the delivery areas associated with each PADDC, as outlined in red in Attachment A. The locations of the proposed PADDC facilities are:

- IGQ1 – 2201 W 159th Street, Markham, IL
- ORD5 – 7001 Volmer Road, Matteson, IL
- MAE3 – 6939 Dempster Street, Morton Grove, IL
- SIL3 – 27 W 501 North Avenue, Ste. 100, West Chicago, IL

Each proposed drone operating area would encompass approximately 175 square miles and a 7.5-mile drone operating radius around the PADDC.

Each proposed PADDC would be located at an existing logistics facility currently operated by Amazon Services. Landing pads used to support drone operations, which would include inspections, maintenance, charging/replacing drone batteries, and loading packages for customer delivery, would occupy a small portion of the facility's existing footprint (e.g., an existing parking lot). No significant physical alteration of existing infrastructure or ground disturbing activities would be required to enable the Proposed Action.

Prime Air does not expect to conduct package deliveries on or beyond coastal shorelines.

Approval of the Proposed Action will restrict Prime Air to operate only in these four locations; any future expansion beyond the authorization and limitations for the area of operations may require additional approval by the FAA, and may be subject to appropriate NEPA review, as necessary.

Unmanned Aircraft

As pictured in Attachment B, 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 PADDC. 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 PADDC. The PADDC 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 C.

Takeoff

Once a package is loaded onto the MK30 drone and the drone is cleared for departure from the PADDC, 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.

En Route Outbound

The en route outbound phase is the part of flight in which the MK30 drone transits from the PADDC 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.

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 about 345 feet AGL (ranges from 279 to 377 feet AGL). The delivery phase of flight would last approximately one minute.

En Route Inbound

The MK30 drone continues to fly at an altitude of about 345 feet AGL with a speed of 67 mph towards the PADDC.

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 descends over its assigned landing pad and lands on the pad.

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 are approximately 90.5 dB (at

20 feet), 92.1 dB (at 25 feet), and 91.8 dB (at 20 feet). 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 is at an altitude of 200 feet AGL and flying at approximately 67 mph.

The drone is generally expected to fly the same outbound flight path between a PADDC and the delivery point and inbound flight path back to the PADDC. While the average daily deliveries from any PADCC is not expected to exceed 1,000, the number of daily overflights will likely be dispersed because the PADCC is centrally located in the delivery 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 is not expected to exceed half of the projected daily deliveries, or 500 deliveries. Since each delivery involves both an outbound and inbound flight path, this equates to 1,000 daily overflights. The resulting Day-Night Average Sound Level (DNL) could reach DNL 43 dB in any location within the operating area.

Due to the inherent uncertainty of the exact delivery site locations, the noise analysis developed a minimum and maximum representative distribution of deliveries in each drone delivery area. The noise analysis conservatively assumes the minimum and maximum distribution of average daily deliveries that could occur at a single delivery location, which ranges from 1 to 4 deliveries per operating day. The noise for delivery operations also includes outbound and inbound en route overflights at the typical operating altitudes of 200 and 345 feet AGL, respectively, for operations associated with deliveries to other locations. The outbound en route altitude 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 AGL back to the PADDC, with the resulting DNL of 52.5 dB at 16.4 feet.

Assessment of Potential Effects

Based on the following, the FAA has determined that the Proposed Action would be consistent with the Illinois Coastal Management Program:

- Each proposed PADDC location currently serves as an existing distribution/logistics facility for Amazon Service and the Proposed Action would not involve the construction of any new or alteration of any existing infrastructure.
- After departing the PADDC, the drone would fly at about 67 mph to its delivery destination at between 180 and 279 feet. At the delivery location, the drone would descend to about 13 feet, stop, and drop the package to the customer. The drone would then ascend and fly back to the PADDC at between 279 and 377 feet.
- During inbound and outbound flight, the drone would be visible for less than 4 seconds to an observer on the ground. The delivery process at the customer's location (descend, hover, ascend) would last less than one minute. The noise levels associated with outbound/inbound flight and delivery are not expected to exceed federal thresholds of significance.
- Given the predicted noise levels and the short-term visual effects, drone operations are not expected to impact farmlands, parks, and recreational areas.

- The drones would be electrically powered and operate on batteries; therefore, the minimal emissions associated with battery charging would be unlikely to contribute to any exceedance of National Ambient Air Quality Standards.
- Because no ground disturbing activities, such as construction, would be involved and the drones would not touch the ground, except while at the PADDC, the Proposed Action is not expected to impact any wetlands, floodplains, surface waterbodies, or groundwater resources.

As previously described, the FAA is in the process of consulting with the USFWS Illinois-Iowa Ecological Field Services Office and the Illinois SHPO to determine any potential impacts to biological and historical resources resulting from the Proposed Action.

Conclusion

The FAA requests your concurrence with the FAA's determination that the Proposed Action is consistent with the ICMP and complies with Illinois' approved coastal management program and will be conducted in a manner consistent with such policies. Your response within the next 30 days will greatly assist us in our environmental review process. In the event that you would like to consult with the FAA about the determination, 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: 2026.04.23 13:36:59 -04'00'

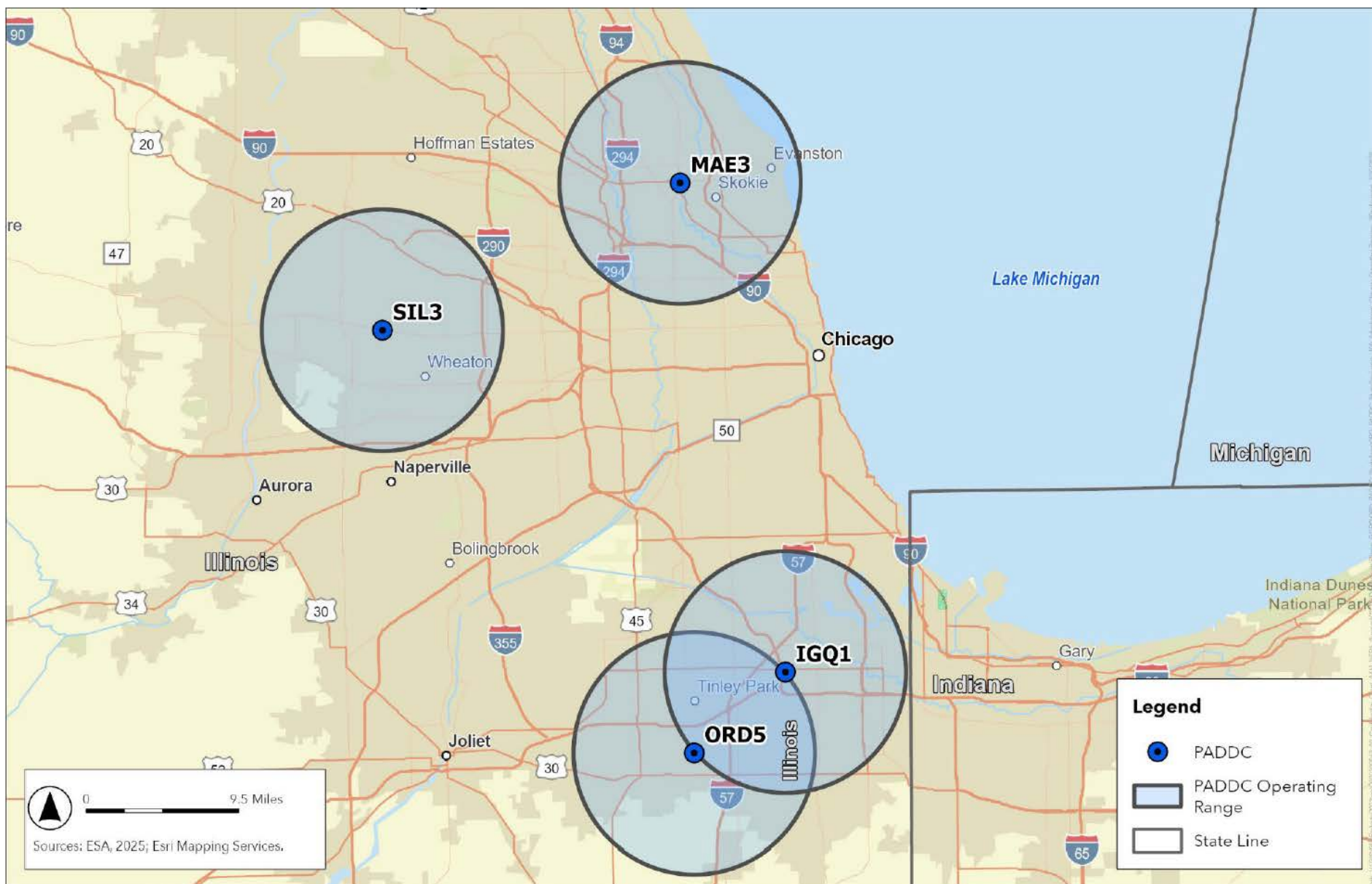
Joseph Hemler
Manager, General Aviation and Commercial Branch (AFS-752)
Emerging Technologies Division
Office of Safety Standards, Flight Standards Service

Enclosures:

Attachment A – Proposed Drone Operating Areas
Attachment B – Amazon Prime Air MK30 Drone
Attachment C – MK30 Drone Flight Profile

Attachment A

Proposed Drone Operating Areas



Attachment B

Amazon Prime Air MK30 Drone



Amazon Prime Air MK30 Drone

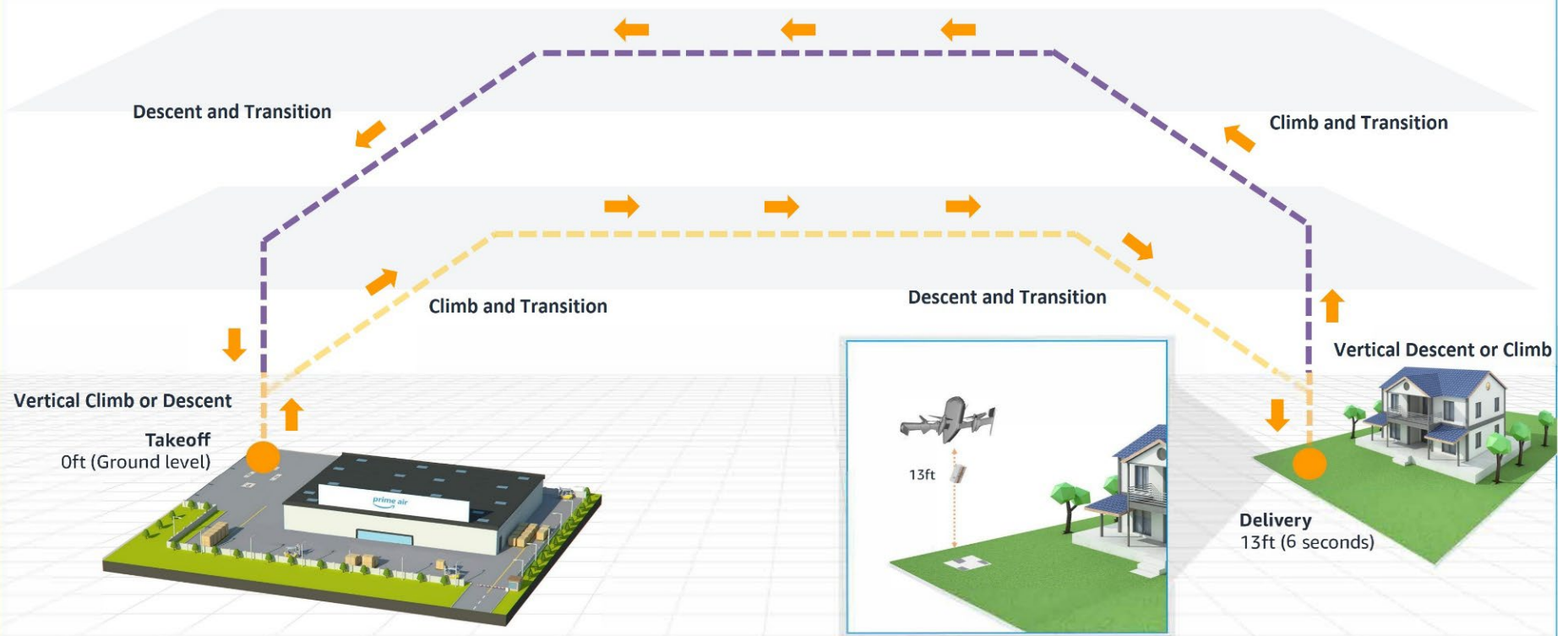
Attachment C

MK30 Drone Flight Profile



Fixed Wing Cruise

Can range from 205ft – 250ft at 58kts (inbound to customer)
Can range from 325ft -370ft at 58kts (outbound to PADDCC)





Illinois
Department of
**Natural
Resources**

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May 28, 2026

Joseph Hemler
Manager, General Aviation and Commercial Branch (AFS-752)
Emerging Technologies Division
Office of Safety Standards, Flight Standards Service
Federal Aviation Administration
800 Independence Ave., SW
Washington, DC 20591

RE: IDNR/CMP Federal Consistency Determination IFC2026009 by the Federal Aviation Administration for
Commercial Drone Delivery Operations in Illinois

Dear Mr. Hemler,

Thank you for the federal consistency certificate received April 23, 2026 for the above referenced project. Department staff have reviewed the determination and concur that the proposed activity complies with the enforceable policies of the ICMP and will be conducted in a manner consistent with the ICMP.

This determination applies only to the ICMP and does not exempt you from obtaining any other required federal, state, or local authorizations.

If you have any questions, please contact me at eric.otto@illinois.gov.

Sincerely,

Eric L. Otto, PE, CPESC, CPSWQ
Senior Water Resources Engineer
Lake Michigan Programs