

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

## **D-1 SHPO Consultation**

**From:** Hurst, Christopher A (FAA)  
**To:** Slagor, Scott (LEO); Fitzpatrick, Jim; Neal Wolfe  
**Cc:** DeLaune, Jonathan (FAA)  
**Subject:** FAA-Amazon: Drone Package Delivery (Confirmation - Michigan State Historic Preservation Office Project Review Submissions)  
**Date:** Monday, April 28, 2025 11:04:33 AM

Scott, Neal and Jim,  
Submitted.

Scott,  
Please do not hesitate to reach out. Very appreciative this new industry may raise questions.  
Look forward to working with you.

V/r,  
Chris

Chris Hurst  
REM/CEA/CESCO  
Environmental Protection Specialist

AFS-752  
General Aviation and Commercial Branch  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service  
christopher.a.hurst@FAA.gov  
CST

**From:** Smartsheet Forms <forms@app.smartsheet.com>  
**Sent:** Monday, April 28, 2025 9:44 AM  
**To:** Hurst, Christopher A (FAA) <Christopher.A.Hurst@faa.gov>  
**Subject:** Confirmation - Michigan State Historic Preservation Office Project Review Submissions

**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.

Thank you for submitting your request for consultation under Section 106 of the National Historic Preservation Act of 1966, as amended. A copy is included below for your records.

If you have concerns about your submission or were not able to attach all of your documents, please contact Scott Slagor at SlagorS2@Michigan.gov.

# Michigan State Historic Preservation Office Project Review Submissions

**Project Name:** Amazon Prime Air MK30 Drone Delivery Operations

**Project Street Address:** See attached table

**Project Municipal Unit:** See attached table

**Project County:** See attached table

**Federal Agency:** Federal Aviation Administration

**Federal Agency Contact Name:** Christopher Hurst, Environmental Protection Specialist, christopher.a.hurst@FAA.gov

**Federal Agency Mailing Address (street, city, state, zip code):** Federal Aviation Administration, Suite 802W  
C/O AVS Environmental  
AFS-752  
General Aviation and Commercial Branch  
Emerging Technologies Division  
  
800 Independence Ave SW  
Washington, DC 20591

**Consultant/Applicant Name:** Amazon Inc.; Jim Fitzpatrick

**Consultant/Applicant Agency/Firm:** Environmental Science Associates, Neal Wolfe, Director of Aviation Sustainability and Resilience, 5401 South Kirkman Road, Suite 475 City: Orlando State: Florida Zip: 32819 Email: NWolfe@esassoc.com Phone: 859-757-5317

**Consultant/Applicant Mailing Address:** 410 Terry Ave. N City: Seattle, WA 98109

**Consultant/Applicant Phone Number:** 253-651-3978

**Consultant/Applicant** fitzpkja@amazon.com  
**Email Address:**

## File Attachments

**mishpo-section-106-application-AAM-MK30  
4.21.25.docx**

(87k)

**MI SHPO\_AttachementA\_Table.docx**

(75k)

**AttachmentB\_Maps.pdf**

(14055k)

**TABLE D-1  
HISTORIC RESOURCES IN THE APE – DET3 PADDC**

<b>Resource Name</b>	<b>Significance</b>
Gillespie Street--Clinton River Bridge	NRHP Listed
Derby Street--Grand Trunk Western Railroad Bridge	NRHP Listed
Trowbridge Road--Grand Trunk Western Railroad Bridge	NRHP Listed
Griggs Brothers--Rochester Elevator Company Grain Elevator	NRHP Listed
Howard, Horatio N., House	NRHP Listed
Central School	NRHP Listed
Eagle Theater	NRHP Listed
Grinnell Brothers Music House	NRHP Listed
Hunter, John W., House	NRHP Listed
Caswell House	NRHP Listed
Wisner House	NRHP Listed
Myrick-Palmer House	NRHP Listed
Grand Trunk Western Railroad Birmingham Depot	NRHP Listed
Affleck, Gregor S. and Elizabeth B., House	NRHP Listed
Brooks Farm	NRHP Listed
St. Vincent DePaul Catholic Church, Convent, and School	NRHP Listed
Casa del Rey Apartments	NRHP Listed
Torrey, Charles, House	NRHP Listed
Smith, Melvyn Maxwell and Sara Stein, House	NRHP Listed
Sprague, Rollin, Building--Old Stone Store	NRHP Listed
Western Knitting Mills	NRHP Listed
Endicott, John & Mary Elizabeth Booth, House	NRHP Listed
O'Dell, H. Augustus and Agnes Cleveland, House--Inch House	NRHP Listed
Taliaferro, Thomas W. and Margaret, House	NRHP Listed
Yamasaki, Minoru & Teruko, House	NRHP Listed
Oak Hill Cemetery	NRHP Listed
Scripps, William Edmund and Nina A. Downey, Estate	NRHP Listed
Cranbrook	NRHP Listed
Eastern Michigan Asylum Historic District	NRHP Listed
Orchard Lake Schools Historic District	NRHP Listed
Franklin Boulevard Historic District	NRHP Listed
Pontiac Commercial Historic District	NRHP Listed
Fairgrove Avenue Historic District	NRHP Listed
Modern Housing Corporation Addition Historic District	NRHP Listed
Pontiac Commercial Historic District (Boundary Increase)	NRHP Listed
Lower Trout Lake Bathhouse Complex and Contact Station	NRHP Listed
Meadow Brook Farms	NRHP Listed

<b>Resource Name</b>	<b>Significance</b>
Historic Green	State Listed
Wattles House	State Listed
Troy Corners	State Listed
Meadow Brook Hall	State Listed
St. Vincent de Paul Church / St. Vincent de Paul Church	State Listed
Pine Grove	State Listed
Emmendorfer House / Francis A. Emmendorfer	State Listed
Western Knitting Mills	State Listed
The Courthouse / Oakland County	State Listed
S.S. Kresge Company	State Listed
Clinton Valley Center / Clinton Valley Center	State Listed
Township Hall	State Listed
The Academy of the Sacred Heart	State Listed
Masonic Block	State Listed
First Methodist Episcopal Church	State Listed
Orchard Lake Schools / Joseph Tarr Copeland	State Listed
Rochester	State Listed
Rollin Sprague Building	State Listed
Bagley Inn	State Listed
Chief Pontiac	State Listed
Howarth School	State Listed
Greenwood Cemetery / Greenwood Cemetery	State Listed
Mount Avon Cemetery	State Listed
Newman African Methodist Episcopal Church	State Listed
First Baptist Church	State Listed
The Kresge Foundation	State Listed
Decker Settlement / Jesse Decker	State Listed
William E. Scripps / William E. and Nina Scripps Estate	State Listed
Barn Church	State Listed
Troy Township	State Listed
Rochester Opera House	State Listed
George Vandeventer House	State Listed
Elizabeth Denison Forth	State Listed
First Presbyterian Church	State Listed
Franklin Boulevard Historic District	State Listed
The Polar Bears / The Polar Bears	State Listed
Oak Hill Cemetery / Oak Hill Cemetery	State Listed
John Almon Starr House	State Listed

**TABLE D-2  
HISTORIC RESOURCES IN THE APE – DET6 PADDC**

<b>Resource Name</b>	<b>Significance</b>
Hamtramck Stadium	NRHP Listed
Assumption of the Blessed Virgin Mary Church Complex	NRHP Listed
Palmer Park Boulevard Apartments District	NRHP Listed
West Canfield Historic District (Boundary Increase)	NRHP Listed
Jefferson Intermediate School	NRHP Listed
Cass--Davenport Historic District	NRHP Listed
Sugar Hill Historic District	NRHP Listed
Midtown Woodward Historic District	NRHP Listed
Redstone, Louis G., Residential Historic District	NRHP Listed
Cass Avenue Methodist Episcopal Church	NRHP Listed
St. Josaphat's Roman Catholic Church Complex	NRHP Listed
Maccabees Building	NRHP Listed
Eighth Precinct Police Station	NRHP Listed
Sweetest Heart Of Mary Roman Catholic Church	NRHP Listed
Metropolitan United Methodist Church	NRHP Listed
Woodward Ave. Presbyterian Church	NRHP Listed
First Baptist Church of Detroit	NRHP Listed
North Woodward Congregational Church	NRHP Listed
Temple Beth-El	NRHP Listed
Temple Beth-El	NRHP Listed
St. Joseph's Episcopal Church	NRHP Listed
Highland Park Presbyterian Church	NRHP Listed
Grace Evangelical Lutheran Church	NRHP Listed
Trinity United Methodist Church	NRHP Listed
First United Methodist Church	NRHP Listed
The Clay School	NRHP Listed
Thompson Home	NRHP Listed
Whitney, David, House	NRHP Listed
Engine House No. 11	NRHP Listed
McAdow, Perry, House	NRHP Listed
Hecker, Col. Frank J., House	NRHP Listed
Scarab Club	NRHP Listed
Sacred Heart Roman Catholic Church, Convent and Rectory	NRHP Listed
Orchestra Hall	NRHP Listed
Michigan State Fair Riding Coliseum, Dairy Cattle Building, and Agricultural Building	NRHP Listed
Lee Plaza Hotel	NRHP Listed
Kresge, S. S., World Headquarters	NRHP Listed

<b>Resource Name</b>	<b>Significance</b>
Kahn, Albert, House	NRHP Listed
Hunter House	NRHP Listed
Grand Riviera Theater	NRHP Listed
Gethsemane Evangelical Lutheran Church	NRHP Listed
Freer, Charles Lang, House	NRHP Listed
First Unitarian Church of Detroit	NRHP Listed
First Presbyterian Church	NRHP Listed
First Congregational Church	NRHP Listed
Dunbar Hospital	NRHP Listed
Detroit Masonic Temple	NRHP Listed
Coronado Apartments	NRHP Listed
Central Woodward Christian Church	NRHP Listed
Cathedral of the Most Blessed Sacrament	NRHP Listed
Cathedral Church of St. Paul Complex	NRHP Listed
Boydell, William C., House	NRHP Listed
Belcrest Hotel	NRHP Listed
St. Albertus Roman Catholic Church	NRHP Listed
Taylor, Elisha, House	NRHP Listed
Trinity Episcopal Church	NRHP Listed
St. Joseph's Episcopal Church	NRHP Listed
Sante Fe Apartments	NRHP Listed
Strasburg, Herman, House	NRHP Listed
Sprague, Thomas S., House	NRHP Listed
Smith, Samuel L., House	NRHP Listed
Verona Apartments	NRHP Listed
Cass Motor Sales	NRHP Listed
Saint Andrew's Memorial Episcopal Church	NRHP Listed
Chatsworth Apartments	NRHP Listed
St. Thomas the Apostle Catholic Church and Rectory	NRHP Listed
St. Theresa of Avila Roman Catholic Parish Complex	NRHP Listed
St. Stanislaus Bishop and Martyr Roman Catholic Parish Complex	NRHP Listed
Fisher and New Center Buildings	NRHP Listed
St. Catherine of Siena Roman Catholic Parish Complex	NRHP Listed
Norris, Philetus W., House	NRHP Listed
George, Edwin S., Building	NRHP Listed
Loomer, George W., House	NRHP Listed
Hunter, Mulford T., House	NRHP Listed
Architects Building	NRHP Listed
Engine House No. 18	NRHP Listed

<b>Resource Name</b>	<b>Significance</b>
Stuber--Stone Building	NRHP Listed
Lancaster and Waumbek Apartments	NRHP Listed
League of Catholic Women Building	NRHP Listed
Hotel Stevenson	NRHP Listed
Graybar Electric Company Building	NRHP Listed
Detroit Edison Company Willis Avenue Station	NRHP Listed
Detroit--Columbia Central Office Building	NRHP Listed
Chapel of St. Theresa--the Little Flower	NRHP Listed
Sts. Peter and Paul Academy	NRHP Listed
Grindley, Robert M. and Matilda (Kitch), House	NRHP Listed
Woodbridge Neighborhood Historic District (Boundary Increase)	NRHP Listed
Hook and Ladder House No. 5--Detroit Fire Department Repair Shop	NRHP Listed
Ford Piquette Avenue Plant	NRHP Listed
Crescent Brass and Pin Company Building	NRHP Listed
General Motors Research Laboratory	NRHP Listed
B and C Grocery Building	NRHP Listed
Hilzinger Block	NRHP Listed
Eddystone Hotel	NRHP Listed
Wardell, The	NRHP Listed
Garden Bowl	NRHP Listed
Majestic Theater	NRHP Listed
Newberry, Helen, Nurses Home	NRHP Listed
Michigan Bell and Western Electric Warehouse	NRHP Listed
Greenfield Union School	NRHP Listed
McGregor Memorial Conference Center	NRHP Listed
Prentis Building and DeRoy Auditorium Complex	NRHP Listed
Tushiyah United Hebrew School--Scott Memorial Methodist Episcopal Church	NRHP Listed
Woodbridge Neighborhood (Boundary Increase II)	NRHP Listed
Fisher Building	NRHP Listed
Doty, Duane, School	NRHP Listed
Atkinson, Edmund, School	NRHP Listed
Cooley, Thomas M., High School	NRHP Listed
Nacirema Club	NRHP Listed
Temple Baptist Church--King Solomon Baptist Church	NRHP Listed
General Motors Technical Center	NRHP Listed
New Amsterdam Historic District	NRHP Listed
Piquette Avenue Industrial Historic District	NRHP Listed
Cass Park Historic District	NRHP Listed
Palmer Park Apartment Buildings Historic District (Boundary Increase)	NRHP Listed

<b>Resource Name</b>	<b>Significance</b>
Rosedale Park Historic District	NRHP Listed
Pleasant Ridge East Historic District	NRHP Listed
Eastern Market Historic District (Boundary Increase)	NRHP Listed
Pleasant Ridge Historic District (Boundary Increase)	NRHP Listed
West Canfield Historic District	NRHP Listed
Boston-Edison Historic District	NRHP Listed
Woodward East Historic District	NRHP Listed
Eastern Market Historic District	NRHP Listed
Wayne State University Buildings	NRHP Listed
East Ferry Avenue Historic District	NRHP Listed
Woodbridge Neighborhood Historic District	NRHP Listed
Virginia Park Historic District	NRHP Listed
Arden Park-East Boston Historic District	NRHP Listed
Palmer Park Apartment Building Historic District	NRHP Listed
Palmer Woods Historic District	NRHP Listed
Cultural Center Historic District	NRHP Listed
St. Florian Historic District	NRHP Listed
Medbury`s--Grove Lawn Subdivisions Historic District	NRHP Listed
Highland Heights--Stevens` Subdivision Historic District	NRHP Listed
Detroit Zoological Park	NRHP Listed
Pleasant Ridge Historic District	NRHP Listed
Warren--Prentis Historic District	NRHP Listed
Willis--Selden Historic District	NRHP Listed
Lathrup Village Historic District	NRHP Listed
East Grand Boulevard Historic District	NRHP Listed
Campau, Jos., Historic District	NRHP Listed
Ford, Henry, Hospital	NRHP Listed
Highland Park Plant, Ford Motor Company	NRHP Listed
General Motors Building	NRHP Listed
Sacred Heart Seminary	NRHP Listed
Highland Park General Hospital	NRHP Listed
Basso Building	NRHP Eligible
Bohn Aluminum & Brass Corporation	NRHP Eligible
Cathedral Church of St. Paul Episcopal	NRHP Eligible
Dodge Main Plant	NRHP Eligible
Chene Street Commercial District	NRHP Eligible
Coronado Apartments	NRHP Eligible
Detroit Steel Products Company	NRHP Eligible
Detroit Public Library Downtown Branch	NRHP Eligible

<b>Resource Name</b>	<b>Significance</b>
Dom Polski Hall	NRHP Eligible
Fisher Building	NRHP Eligible
Guarantee Trust & Loan Company/Dennison Bookkeeping	NRHP Eligible
Immaculate Conception Church	NRHP Eligible
Industrial Women's Service Center/Goodwill Community Chapel	NRHP Eligible
Hupp Motor Car Company	NRHP Eligible
Majeske School	NRHP Eligible
Malawa Funeral Home/Brown Bros. Funeral Home	NRHP Eligible
Maxwell Motor Company/Fisher Body Company	NRHP Eligible
Northern Senior High School	NRHP Eligible
Park Shelton Apartments	NRHP Eligible
David Mackenzie House	NRHP Eligible
New Center	NRHP Eligible
New Center Building	NRHP Eligible
Purple Heart Value Village	NRHP Eligible
Hervey Parke Elementary School	NRHP Eligible
Robson-Dodge House	NRHP Eligible
St. Hyacinth Roman Catholic Church & School	NRHP Eligible
St. Elizabeth's Church and Schools	NRHP Eligible
Henry M. Utley Branch Library	NRHP Eligible
St. Stanislaus Roman Catholic Church & Parish House	NRHP Eligible
St. Michael's Greek Catholic Church/Temple of Faith Missionary Baptist Church	NRHP Eligible
Reverend John A. Lemke	State Listed
Colonel John Francis Hamtramck / Colonel John Francis Hamtramck	State Listed
Bethel African Methodist Episcopal Church	State Listed
Saginaw Trail	State Listed
The First Mile of Concrete Highway	State Listed
Mackenzie House	State Listed
Royal Oak Township Cemetery/Saint Mary Catholic Cemetery	State Listed
Highland Park Plant	State Listed
Detroit Zoological Park	State Listed
Brewster Homes	State Listed
Robert Pauli Scherer	State Listed
Carver Elementary School	State Listed
St. Clement Cemetery	State Listed
Orsel McGhee House	State Listed
First Baptist Church of Royal Oak / First Baptist Church of Royal Oak	State Listed
St. Josaphat Roman Catholic Church Complex	State Listed
Hilberry Theatre	State Listed

<b>Resource Name</b>	<b>Significance</b>
Home of the Model T	State Listed
Royal Oak Methodist Episcopal Church	State Listed
First Unitarian Universalist Church	State Listed
Detroit Arsenal Tank Plant / Detroit Arsenal Tank Plant	State Listed
First Congregational Church of Detroit	State Listed
Thompson Home	State Listed
Zion Lodge No. 1, F. and A. M.	State Listed
Omega Psi Phi	State Listed
Saint Clement Catholic Parish	State Listed
Hartford Memorial Baptist Church	State Listed
Dodge Brothers, The / Dodge Main	State Listed
Detroit Urban League	State Listed
Warren Union Cemetery	State Listed
Chrysler Corporation	State Listed
Village of Warren	State Listed
Recreation Park / Recreation Park	State Listed
Assumption Roman Catholic Church / Assumption Grotto Church Complex	State Listed
Fisher Building	State Listed
Martin Kundig	State Listed
Elijah McCoy Homesite	State Listed
Motown / Motown	State Listed
Henry Ford House	State Listed
Cass Community United Methodist Church	State Listed
David Whitney Jr. Residence	State Listed
St. Hyacinth Catholic Church	State Listed
Bishop's Residence / Bishop's Residence	State Listed
Conant Gardens	State Listed
St. Philip's Lutheran Church / St. Philip's Lutheran Church	State Listed
Saint Florian Church / Saint Florian Historic District	State Listed
Roseland Park Mausoleum	State Listed
The Detroit Medical College	State Listed
Mary Thompson House	State Listed
Governor Alex J. Groesbeck	State Listed
Alpha House	State Listed
Bailey Temple Church Of God In Christ	State Listed
Michigan State Fair	State Listed
Fred A. Baker House	State Listed
Wheeler Center	State Listed
Central Woodward Christian Church	State Listed

<b>Resource Name</b>	<b>Significance</b>
David Augustus Straker	State Listed
Charles Lang Freer House / Merrill-Palmer Institute	State Listed
Hamtramck Stadium / Hamtramck Stadium	State Listed
Sacred Heart Parish	State Listed
Wayne State University	State Listed
Dunbar Hospital	State Listed
Scarab Club	State Listed
The Michigan Stove / The Michigan Stove and the State Fair	State Listed
General Motors Technical Center	State Listed
St. Elizabeth Church	State Listed
Detroit Association of Women's Clubs	State Listed
Greater Shiloh Baptist Church	State Listed
St. Anthony Church	State Listed
Royal Oak Township Cemetery / Saint Mary Catholic Cemetery	State Listed
Ford Piquette Plant	State Listed
William Ferguson Homesite	State Listed
Saint Francis Hospital	State Listed
Detroit Memorial Park Cemetery	State Listed
Sweetest Heart of Mary Catholic Church	State Listed
Michigan's First Tri-Level Intersection	State Listed
Packard Motor Car Company	State Listed
Royal Oak Woman's Club	State Listed
Lawrence Institute of Technology	State Listed
Orson Starr Home	State Listed
American Academy of Pediatrics	State Listed
West Canfield Historic District / West Canfield Historic District	State Listed
North Woodward Avenue Congregational Church	State Listed
Seabiscuit	State Listed
First Presbyterian Church	State Listed
Orchestra Hall	State Listed
Saint Alphonsus Parish / Saint Alphonsus Catholic Church Complex	State Listed
Lewis College of Business	State Listed
St. Albertus Church	State Listed
United Sound Systems Recording Studios / United Sound Systems Recording Studios	State Listed
Duane Doty School	State Listed
Detroit July 1967 /Detroit July 1967	State Listed
Friendship Baptist Church/Friendship Baptist Church	State Listed
Temple No. 1 / Masjid Wali Muhammad	State Listed
Tau Beta Community House / Tau Beta Community House	State Listed

<b>Resource Name</b>	<b>Significance</b>
International Institute Of Detroit / International Institute Of Metropolitan Detroit	State Listed
Birwood Wall /Eight Mile-Wyoming Neighborhood	State Listed
Cathedral Church of St. Paul/Interfaith Emergency Center	State Listed
Rackham Golf Course	State Listed
Berkley Village Hall and Fire-Police Station	State Listed
Sojourner Truth Homes	State Listed
Ulysses S. Grant Elementary School	State Listed
New Bethel Baptist Church	State Listed

**TABLE D-3  
HISTORIC RESOURCES IN THE APE – SMI1 PADDC**

<b>Resource Name</b>	<b>Significance</b>
Hamtramck Stadium	NRHP Listed
Assumption of the Blessed Virgin Mary Church Complex	NRHP Listed
Palmer Park Boulevard Apartments District	NRHP Listed
Redstone, Louis G., Residential Historic District	NRHP Listed
Metropolitan United Methodist Church	NRHP Listed
Woodward Ave. Presbyterian Church	NRHP Listed
First Baptist Church of Detroit	NRHP Listed
North Woodward Congregational Church	NRHP Listed
Temple Beth-El	NRHP Listed
Highland Park Presbyterian Church	NRHP Listed
Grace Evangelical Lutheran Church	NRHP Listed
Trinity United Methodist Church	NRHP Listed
First United Methodist Church	NRHP Listed
Grand Trunk Western Railroad Birmingham Depot	NRHP Listed
Michigan State Fair Riding Coliseum, Dairy Cattle Building, and Agricultural Building	NRHP Listed
Central Woodward Christian Church	NRHP Listed
Cathedral of the Most Blessed Sacrament	NRHP Listed
St. Joseph's Episcopal Church	NRHP Listed
St. Thomas the Apostle Catholic Church and Rectory	NRHP Listed
St. Stanislaus Bishop and Martyr Roman Catholic Parish Complex	NRHP Listed
Fisher and New Center Buildings	NRHP Listed
Norris, Philetus W., House	NRHP Listed
Erin--Warren Fractional District No. 2 Schoolhouse	NRHP Listed
Ford Piquette Avenue Plant	NRHP Listed
General Motors Research Laboratory	NRHP Listed
B and C Grocery Building	NRHP Listed
Hilzinger Block	NRHP Listed
Michigan Bell and Western Electric Warehouse	NRHP Listed
Greenfield Union School	NRHP Listed
Fisher Building	NRHP Listed
Doty, Duane, School	NRHP Listed
Atkinson, Edmund, School	NRHP Listed
Cooley, Thomas M., High School	NRHP Listed
Warren Township District No. 4 School	NRHP Listed
General Motors Technical Center	NRHP Listed
New Amsterdam Historic District	NRHP Listed
Piquette Avenue Industrial Historic District	NRHP Listed

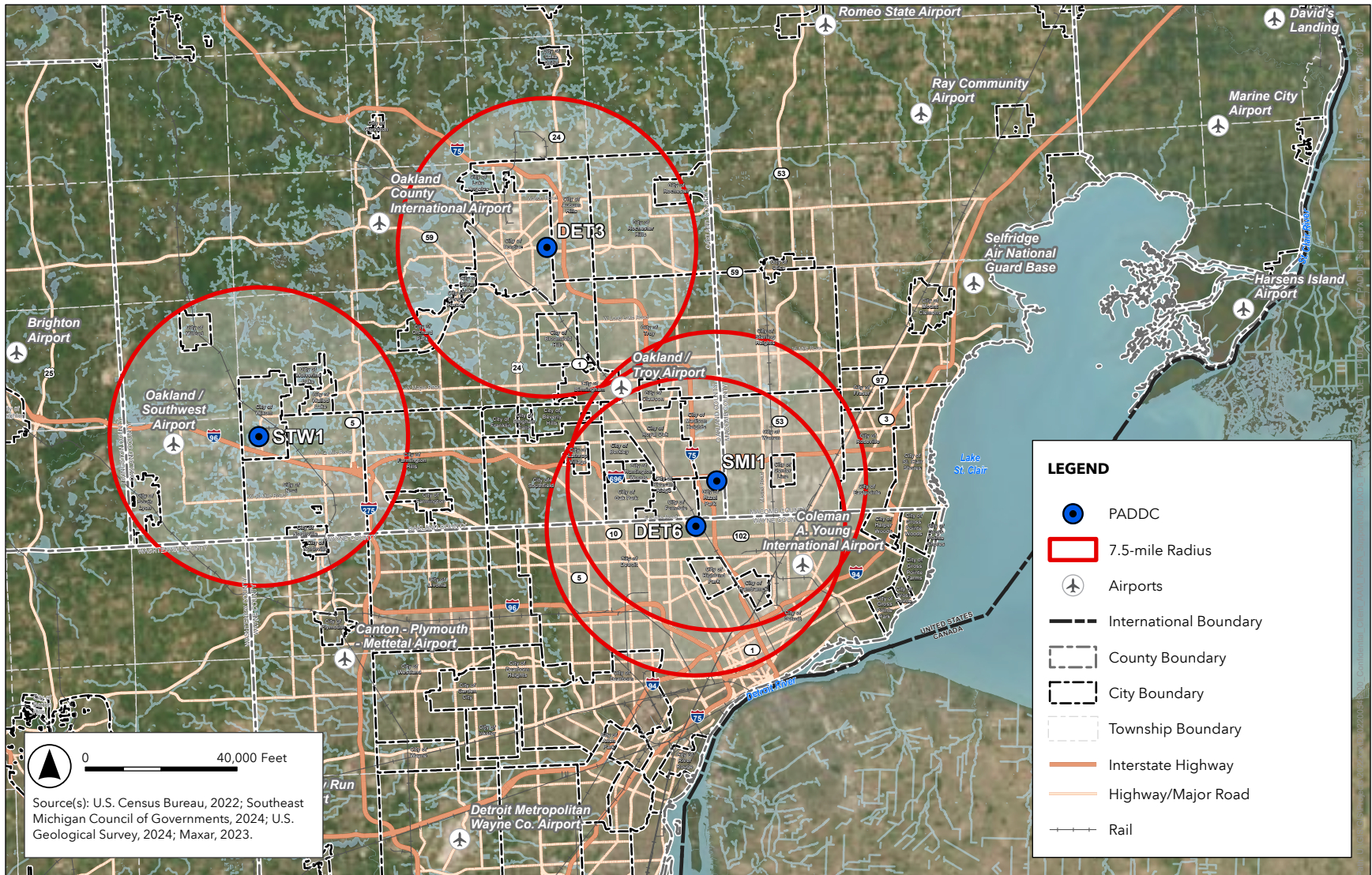
<b>Resource Name</b>	<b>Significance</b>
Palmer Park Apartment Buildings Historic District (Boundary Increase)	NRHP Listed
Pleasant Ridge East Historic District	NRHP Listed
Pleasant Ridge Historic District (Boundary Increase)	NRHP Listed
Boston-Edison Historic District	NRHP Listed
Virginia Park Historic District	NRHP Listed
Arden Park-East Boston Historic District	NRHP Listed
Palmer Park Apartment Building Historic District	NRHP Listed
Palmer Woods Historic District	NRHP Listed
St. Florian Historic District	NRHP Listed
Medbury's--Grove Lawn Subdivisions Historic District	NRHP Listed
Highland Heights--Stevens` Subdivision Historic District	NRHP Listed
Detroit Zoological Park	NRHP Listed
Pleasant Ridge Historic District	NRHP Listed
Lathrup Village Historic District	NRHP Listed
Campau, Jos., Historic District	NRHP Listed
Ford, Henry, Hospital	NRHP Listed
Highland Park Plant, Ford Motor Company	NRHP Listed
General Motors Building	NRHP Listed
Sacred Heart Seminary	NRHP Listed
Highland Park General Hospital	NRHP Listed
Basso Building	NRHP Eligible
Bohn Aluminum & Brass Corporation	NRHP Eligible
Dodge Main Plant	NRHP Eligible
Fisher Building	NRHP Eligible
Immaculate Conception Church	NRHP Eligible
Industrial Women's Service Center/Goodwill Community Chapel	NRHP Eligible
Hupp Motor Car Company	NRHP Eligible
Majeske School	NRHP Eligible
Maxwell Motor Company/Fisher Body Company	NRHP Eligible
Northern Senior High School	NRHP Eligible
New Center	NRHP Eligible
New Center Building	NRHP Eligible
Purple Heart Value Village	NRHP Eligible
Hervey Parke Elementary School	NRHP Eligible
Henry M. Utley Branch Library	NRHP Eligible
St. Stanislaus Roman Catholic Church & Parish House	NRHP Eligible
St. Michael's Greek Catholic Church/Temple of Faith Missionary Baptist Church	NRHP Eligible
St. Peter's Evangelical Lutheran Church	State Listed
Colonel John Francis Hamtramck / Colonel John Francis Hamtramck	State Listed

<b>Resource Name</b>	<b>Significance</b>
Saginaw Trail	State Listed
The First Mile of Concrete Highway	State Listed
Royal Oak Township Cemetery/Saint Mary Catholic Cemetery	State Listed
Highland Park Plant	State Listed
Detroit Zoological Park	State Listed
Carver Elementary School	State Listed
St. Clement Cemetery	State Listed
First Baptist Church of Royal Oak / First Baptist Church of Royal Oak	State Listed
Home of the Model T	State Listed
Royal Oak Methodist Episcopal Church	State Listed
Detroit Arsenal Tank Plant / Detroit Arsenal Tank Plant	State Listed
Saint Clement Catholic Parish	State Listed
Hartford Memorial Baptist Church	State Listed
Dodge Brothers, The / Dodge Main	State Listed
Warren Union Cemetery	State Listed
Chrysler Corporation	State Listed
Village of Warren	State Listed
Assumption Roman Catholic Church / Assumption Grotto Church Complex	State Listed
Fisher Building	State Listed
Erin-Warren Fractional District No. 2 School	State Listed
Henry Ford House	State Listed
Bishop's Residence / Bishop's Residence	State Listed
Conant Gardens	State Listed
Immanuel Methodist Episcopal Church	State Listed
St. Philip's Lutheran Church / St. Philip's Lutheran Church	State Listed
Saint Florian Church / Saint Florian Historic District	State Listed
Roseland Park Mausoleum	State Listed
Governor Alex J. Groesbeck	State Listed
Michigan State Fair	State Listed
Fred A. Baker House	State Listed
Central Woodward Christian Church	State Listed
Hamtramck Stadium / Hamtramck Stadium	State Listed
The Michigan Stove / The Michigan Stove and the State Fair	State Listed
General Motors Technical Center	State Listed
Royal Oak Township Cemetery / Saint Mary Catholic Cemetery	State Listed
Ford Piquette Plant	State Listed
Saint Francis Hospital	State Listed
Detroit Memorial Park Cemetery	State Listed
Michigan's First Tri-Level Intersection	State Listed

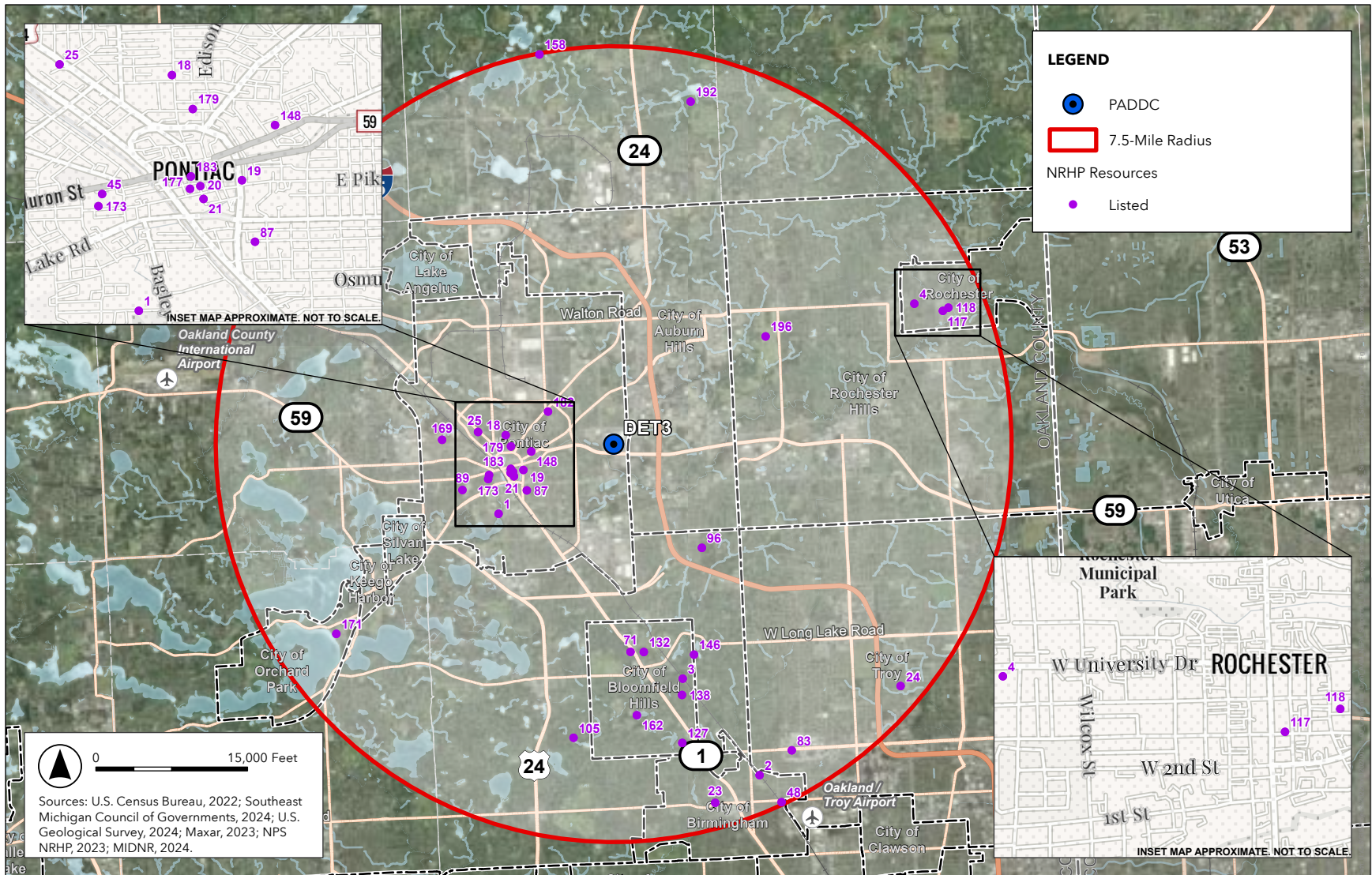
<b>Resource Name</b>	<b>Significance</b>
Packard Motor Car Company	State Listed
Royal Oak Woman's Club	State Listed
Orson Starr Home	State Listed
Warren Township District No. 4 School	State Listed
North Woodward Avenue Congregational Church	State Listed
Seabiscuit	State Listed
Duane Doty School	State Listed
Detroit July 1967 /Detroit July 1967	State Listed
Temple No. 1 / Masjid Wali Muhammad	State Listed
Tau Beta Community House / Tau Beta Community House	State Listed
Birwood Wall /Eight Mile-Wyoming Neighborhood	State Listed
Rackham Golf Course	State Listed
Berkley Village Hall and Fire-Police Station	State Listed
Sojourner Truth Homes	State Listed
Ulysses S. Grant Elementary School	State Listed
New Bethel Baptist Church	State Listed

**TABLE D-4  
HISTORIC RESOURCES IN THE APE – STW1 PADDC**

<b>Resource Name</b>	<b>Significance</b>
Fuerst, Jacob and Rebecca, Farmstead	NRHP Listed
Foote, Dr. Henry K., House	NRHP Listed
Yerkes, Robert, House	NRHP Listed
Greenmead Farms	NRHP Listed
Yerkes, Joseph D., House	NRHP Listed
Andrews--Leggett House	NRHP Listed
Milford Rural Agricultural School	NRHP Listed
Ford Valve Plant	NRHP Listed
Hubbard--Kesby House	NRHP Listed
McCoy, Kittie C., House	NRHP Listed
North Milford Village Historic District	NRHP Listed
Northville Historic District	NRHP Listed
Detroit Finnish Co-operative Summer Camp	NRHP Listed
Detroit Finnish Co-operative Summer Camp Association / Detroitin Suomalainen Kesaleiryhdistys	State Listed
Oak Grove Cemetery	State Listed
"Witch's Hat" Depot	State Listed
Commerce Village Burying Ground / Commerce Village Burying Ground	State Listed
Kinsley S. Bingham	State Listed
John Garfield House	State Listed
Theron Murray House	State Listed
Wixom-Wire House	State Listed
Detroit Edison Company Building	State Listed
Byers Homestead	State Listed
Commerce United Methodist Congregation/ Commerce United Methodist Church	State Listed
Commerce Roller Mill	State Listed
Jacob and Rebecca Fuerst Farmstead / Jacob and Rebecca Fuerst Farmstead	State Listed
Wolverine Lake	State Listed
Wixom Cemetery	State Listed
Mill Race Historical Village / Mill Race Historical Village	State Listed
Samuel White Homestead / Colonel Samuel White	State Listed
Hibbard Tavern	State Listed
Stonecrest	State Listed
Eber Durham House	State Listed
Stephen Yerkes Rodgers House	State Listed
David Simmons House	State Listed
First Presbyterian Church of Northville	State Listed

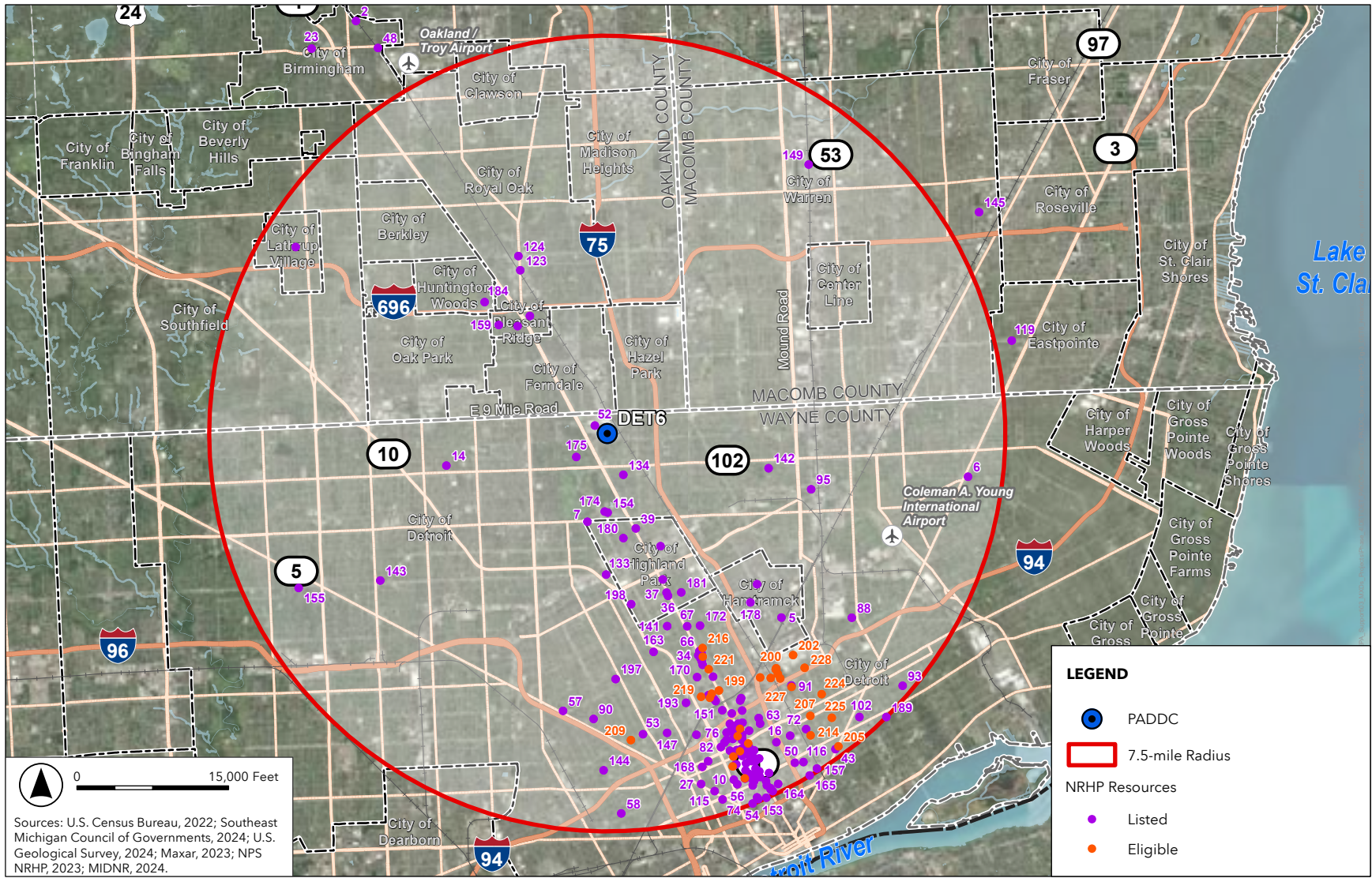


**Figure 1**  
 Attachment B  
 Area of Potential Effects – Overview



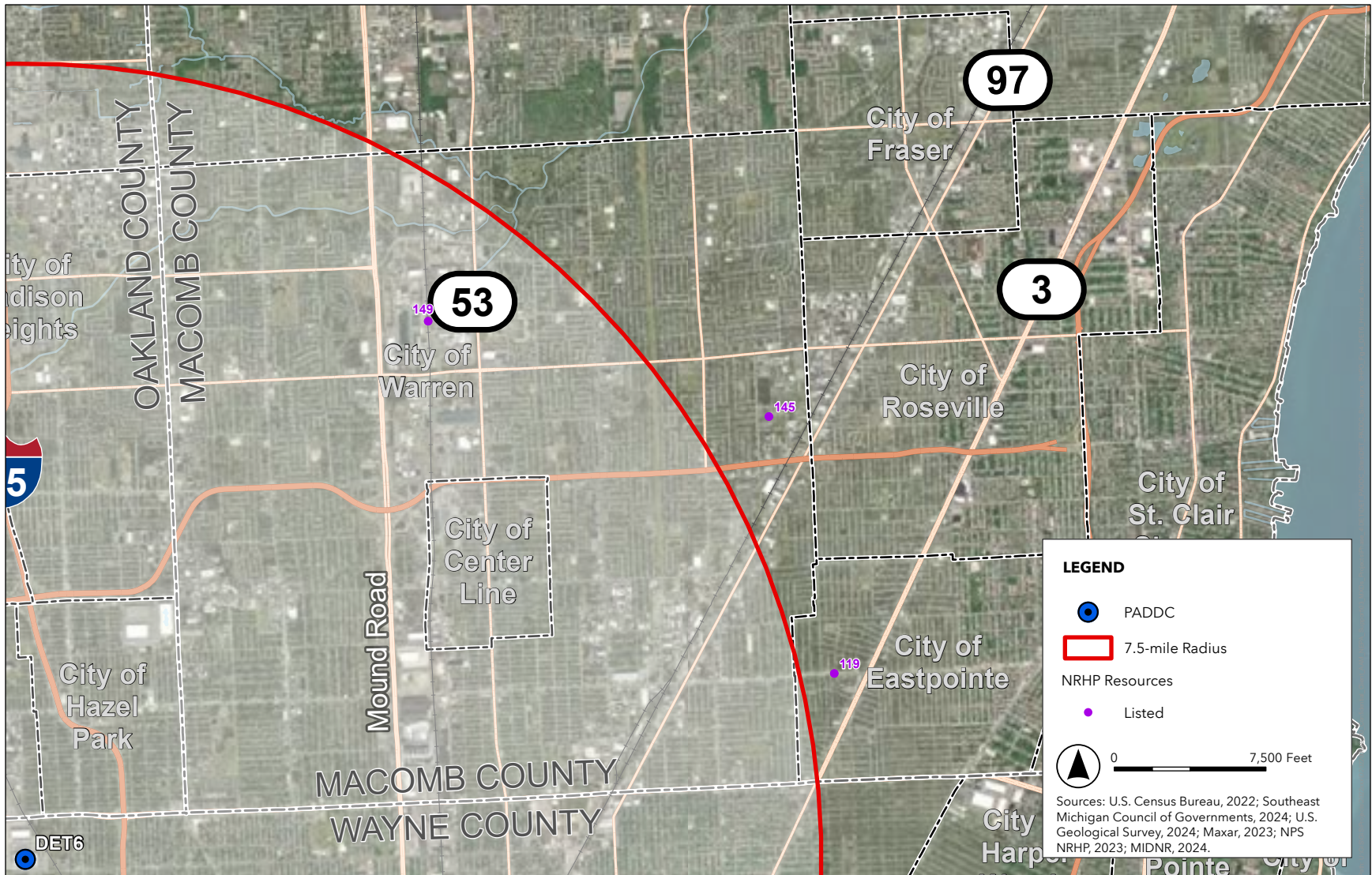
**Figure 2**  
 Attachment B  
 Area of Potential Effects DET3 PADD  
 Historic Resources





**Figure 3**  
 Attachment B  
 Area of Potential Effects DET6 PADD  
 Historic Resources Overview



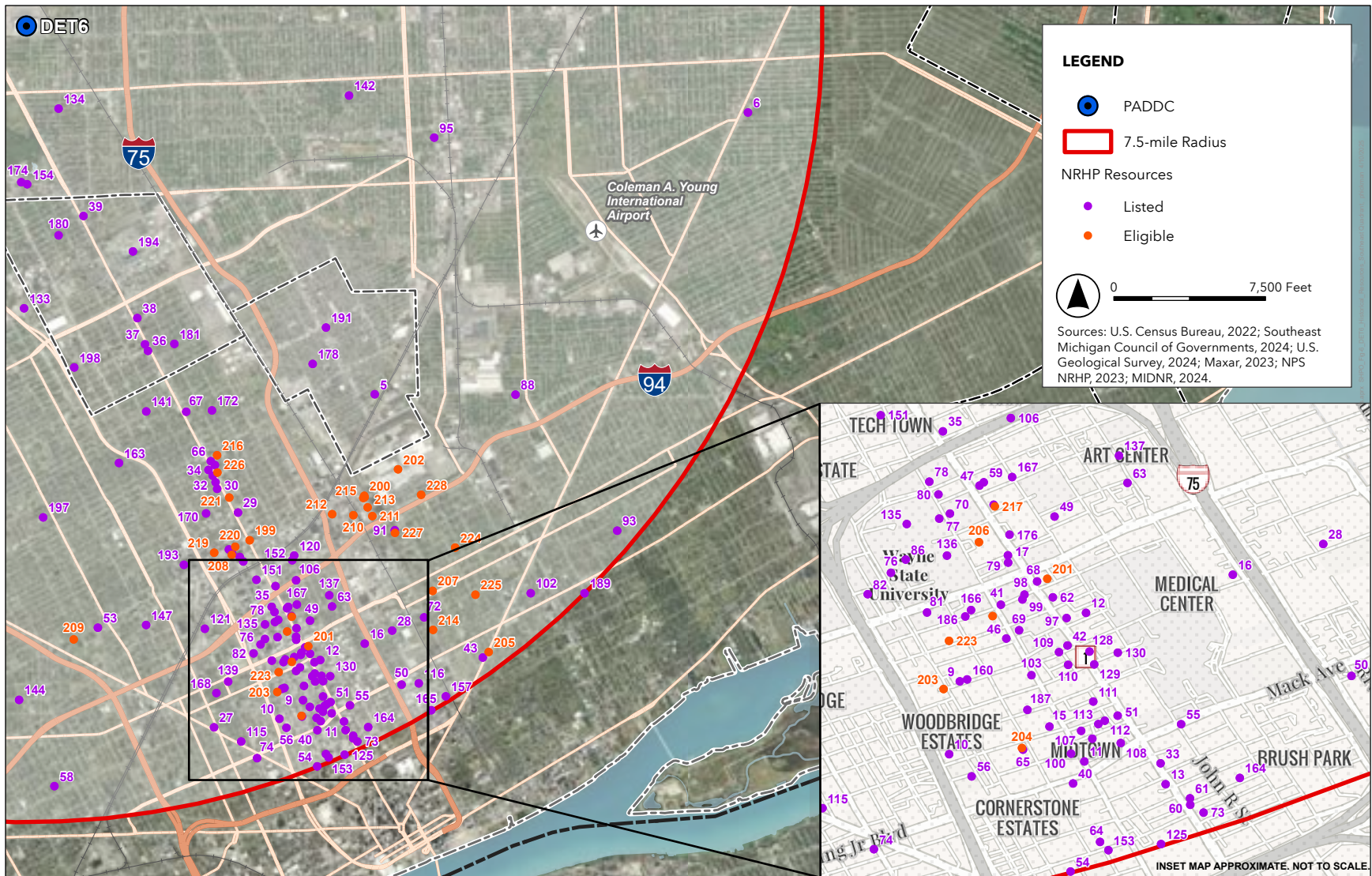


**Figure 4**  
 Attachment B  
 Area of Potential Effects DET6 PADD  
 Historic Resources in Northeast Quadrant

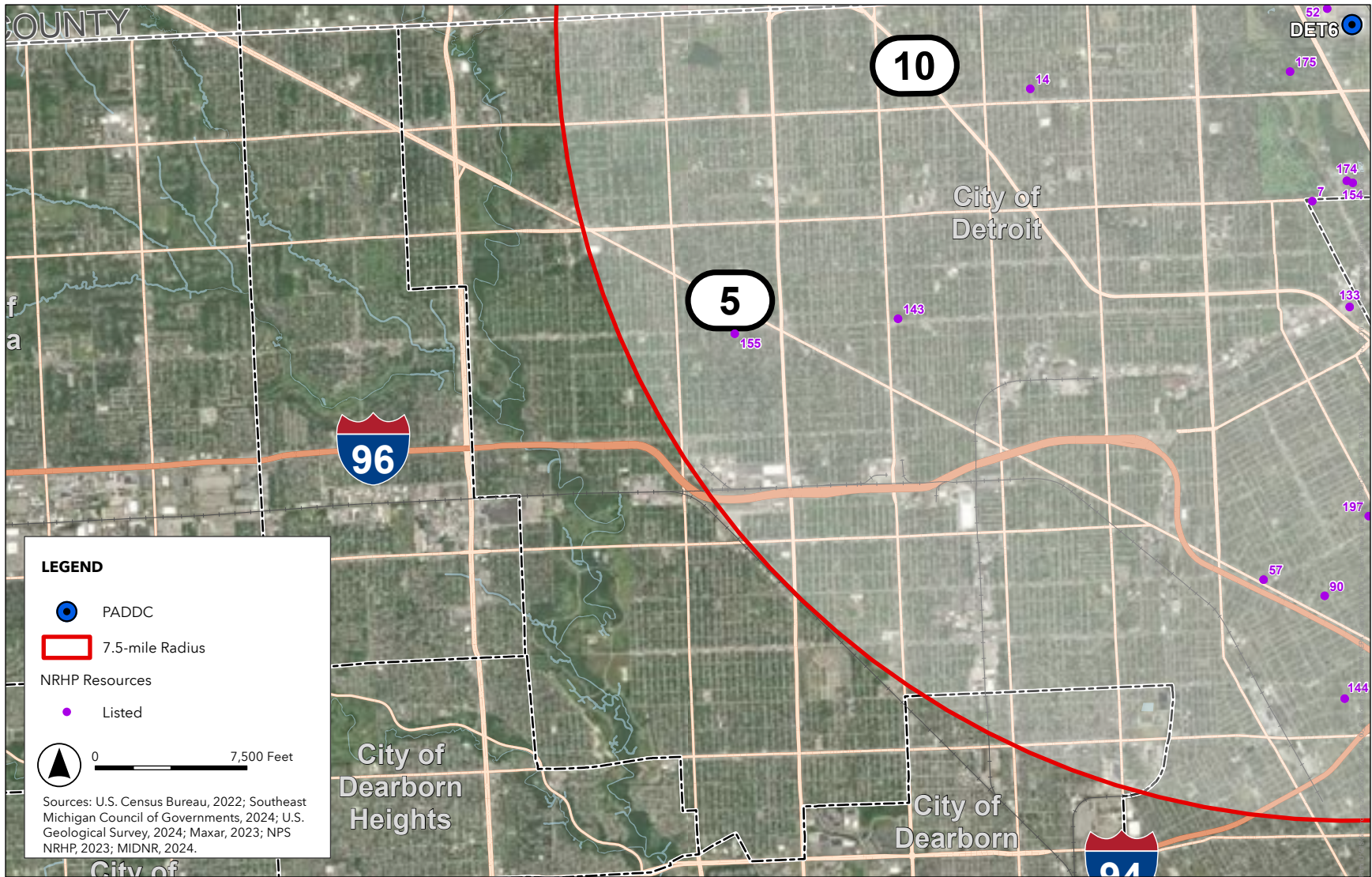




**Figure 5**  
 Attachment B  
 Area of Potential Effects DET6 PADD  
 Historic Resources in the Northwest Quadrant

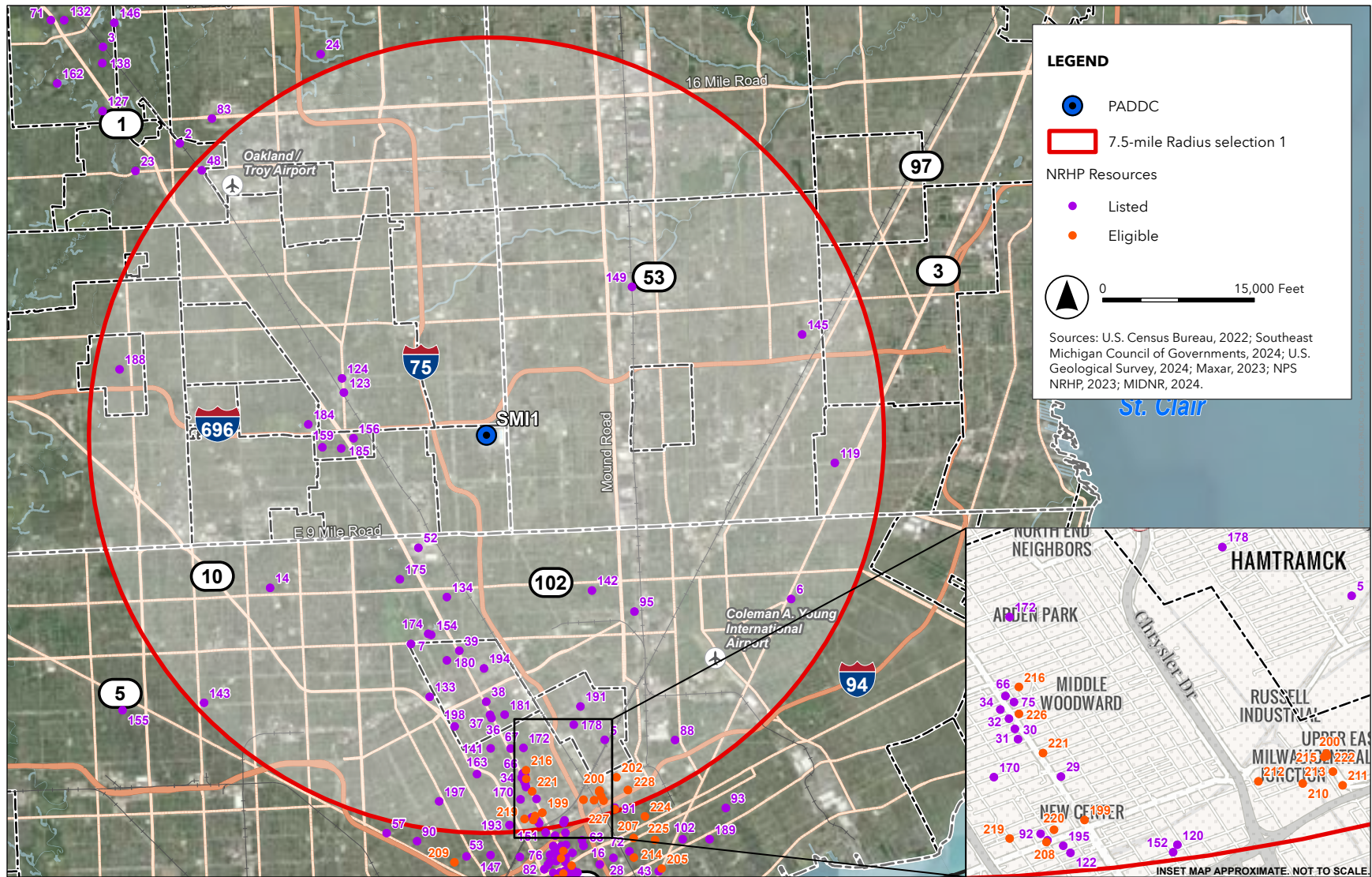


**Figure 6**  
 Attachment B  
 Area of Potential Effects DET6 PADDC  
 Historic Resources in Southeast Quadrant



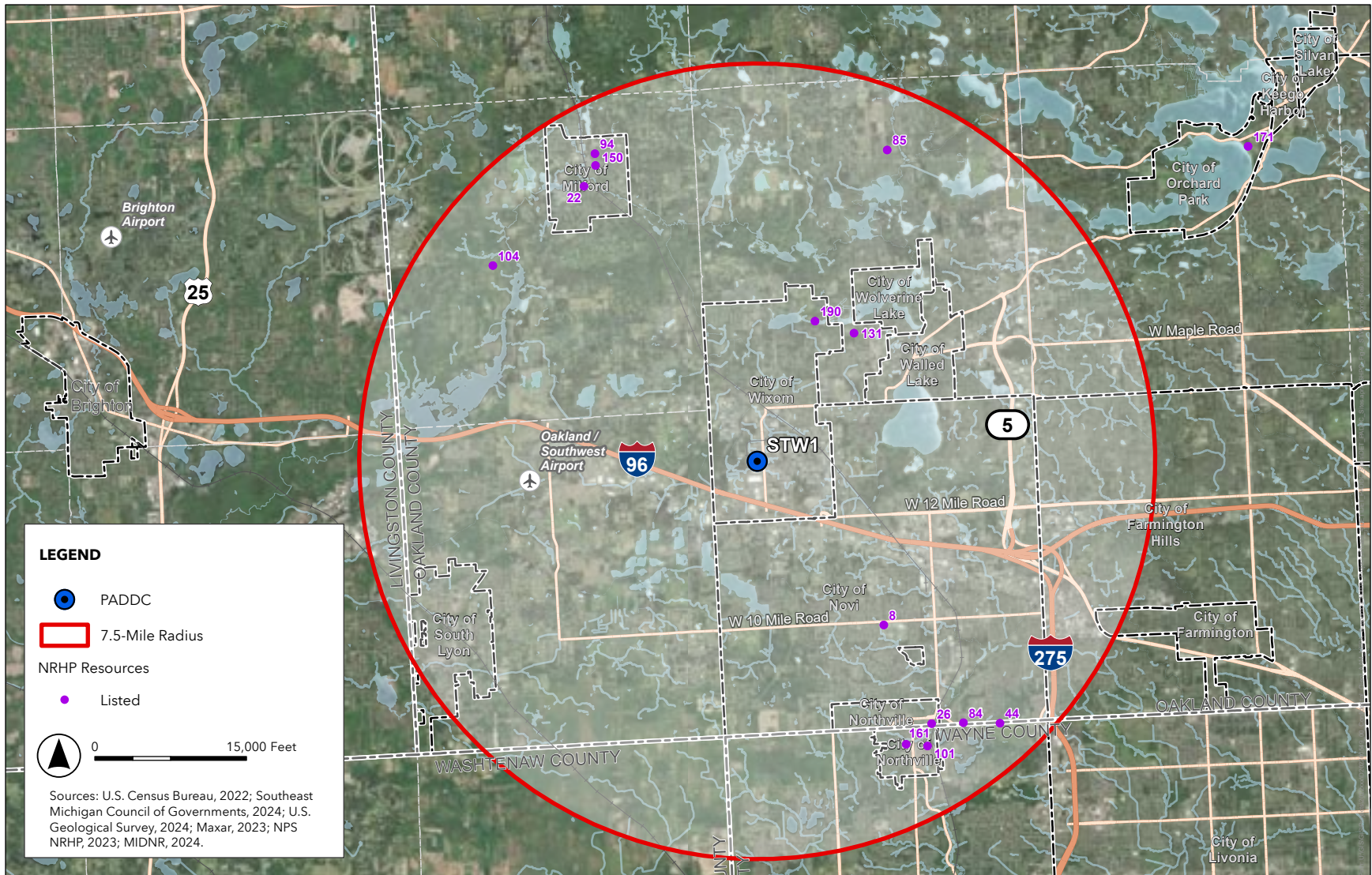
**Figure 7**  
 Attachment B  
 Area of Potential Effects DET6 PADD  
 Historic Resources in the Southwest Quadrant





**Figure 8**  
 Attachment B  
 Area of Potential Effects SMI1 PADD  
 Historic Resources





**Figure 9**  
 Attachment B  
 Area of Potential Effects STW1 PADD  
 Historic Resources

**From:** [Nelson, Cassandra \(LEO\)](#)  
**To:** [christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)  
**Cc:** [fitzpkja@amazon.com](mailto:fitzpkja@amazon.com); [Neal Wolfe](#)  
**Subject:** ER25-561 Amazon Prime Air MK30 Drone Delivery Operations, Multiple Locations, Wayne County (FAA)  
**Date:** Wednesday, May 28, 2025 10:36:37 AM  
**Attachments:** [25-561 MIN.pdf](#)

---

Hello,

Please find the attached response to the consultation request noted above. Hard copies of our response can be mailed on request. **We require more information to complete our review. Consultation is not complete.**

Additional information can be submitted online through our [Additional Information Portal](#).

Please let me know if you have any questions.

Thank you,

Cassandra



**Cassandra Nelson**

Historian

**State Historic Preservation Office**

300 N. Washington Square

Lansing, MI 48913

Office: 517.335.9840 Direct: 517.648.4050

[michigan.gov/shpo](http://michigan.gov/shpo)

Get the latest news with the [SHPO](#) and [MEDC Community Development](#) newsletters!



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
MICHIGAN STRATEGIC FUND  
STATE HISTORIC PRESERVATION OFFICE

QUENTIN L. MESSER, JR.  
PRESIDENT

May 28, 2025

CHRISTOPHER HURST  
ENVIRONMENTAL PROTECTION SPECIALIST  
FEDERAL AVIATION ADMINISTRATION  
SENT ELECTRONICALLY TO: [christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)

RE: ER25-561 Amazon Prime Air MK30 Drone Delivery Operations, Multiple Locations, Wayne County (FAA)

Dear Christopher Hurst:

We have received your request for review of the above-cited undertaking at the location noted above. The information that you have sent has prompted us to ask for additional details. Please send the following information so that we may complete our review:

- In the application for Section 106 review it is stated that Amazon Prime Air projects up to 4,000 daily drone flights over the Detroit metropolitan area, 365 days a year. The application states that 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." The materials submitted with the application identify approximately 230 National Register listed or eligible sites and districts within the Area of Potential Effects. Please provide clarification on how many overflights per day each listed and/or eligible site would be subject to, and how Amazon Prime Air coordinates deliveries to avoid sites and minimize impacts. Will residential historic districts and rural areas be handled differently than urban areas?
- What other cities/communities are Amazon drones currently operating in?
- Has noise testing been conducted in all four areas in which Amazon Prime Air drone delivery is being proposed?
- If possible, please provide video documentation of the proposed drones, demonstrating their size and noise level.
- What happens in the event of a drone crash? Is there a risk of fire or explosion?

Additional information can be submitted online through our [Additional Information Portal](#).

**Please note that the Section 106 review process cannot proceed until we are able to consider the information requested above. This letter does not clear the project** If you have any questions, please contact Cassandra Nelson, Historian, at 517-648-4050 or by email at [nelsonc32@michigan.gov](mailto:nelsonc32@michigan.gov). **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Cassandra Nelson  
Historian

SSE:CN

Copy: Jim Fitzpatrick, Amazon Prime Air  
Neal Wolfe, Environmental Science Associates



In response to your Request for Additional Information, please see the following:

**Question 1:** *“In the application for Section 106 review it is stated that Amazon Prime Air projects up to 500 daily drone flights over the Detroit metropolitan area, 365 days a year. The application states that 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.” The materials submitted with the application identify approximately 100 potential sites and districts within the Area of Potential Effects. Please provide clarification on how many overflights per day each listed area or eligible site would be subject to, and how Amazon Prime Air coordinates deliveries to avoid sites and minimize impacts. Will residential historic districts and rural areas be handled differently than urban areas?”*

**Response 1:** The number of daily drone flights over any particular location cannot be explicitly determined, as flight paths and overflights are dictated by customer demand. While Amazon Prime Air has provided a conservative estimate suggesting that approximately half of its operations will result in flights over a single location, this figure is expected to be significantly lower in practice.

According to estimates presented in the Draft Environmental Assessment (EA), the maximum number of overflights over any one location is not expected to exceed half of the projected daily deliveries - approximately 500 deliveries. Since each delivery involves both outbound and inbound flight paths, this equates to roughly 1,000 daily overflights. Additionally, when two or more MK30 drone operating areas (i.e., Areas of Potential Effects, or APEs) overlap, it was conservatively estimated that overflights associated with an additional 500 daily deliveries would be accounted for per APE overlap. It is important to note that the assumed number of overflights is used to establish the maximum theoretical sound exposure at any given location; however, it is extremely likely that the actual number of overflights will be far lower.

Amazon Prime Air does not intend to specifically avoid flights over historic districts or sites. Operations for drone deliveries will be conducted in a manner consistent across both rural and urban locations. However, the primary concern in determining flight paths is ensuring safe drone operation, which includes avoiding obstacles such as people and structures.

Amazon Prime Air's Airspace Mission Orchestration System (AMOS) plans the routes the drone will fly to and from delivery locations via the most direct routing possible. This results in a generally straight line from the PADDC to the customer and back, taking

consideration of templated No-Fly Zones. These No-Fly Zones may be based on airspace restrictions or they may be ground-based restrictions such as critical infrastructure, sensitive wildlife areas, or areas that have open-air assemblies of people.

**Question 2:** *“What other cities/communities are Amazon drones currently operating in?”*

**Response 2:** Amazon Prime Air is currently conducting drone deliveries in Tolleson, Arizona and College Station, Texas. Both PADDCC locations utilize the MK30 drone for package deliveries.

Documentation of consultation with the Arizona SHPO for the Tolleson PADDCC can be found in Appendix D of the 2024 Final EA:

[https://www.faa.gov/uas/advanced\\_operations/nepa\\_and\\_drones/Final-EA\\_TollesonAZ-2024.pdf](https://www.faa.gov/uas/advanced_operations/nepa_and_drones/Final-EA_TollesonAZ-2024.pdf)

Documentation of consultation with the Texas Historical Commission for the College Station PADDCC can be found in Appendix D of the 2024 Final Supplemental EA:

[https://www.faa.gov/uas/advanced\\_operations/nepa\\_and\\_drones/FINAL-College-Station-Supplemental-EA-23Sept2024.pdf](https://www.faa.gov/uas/advanced_operations/nepa_and_drones/FINAL-College-Station-Supplemental-EA-23Sept2024.pdf)

**Question 3:** *“Has noise testing been conducted in all four areas in which Amazon Prime Air drone delivery is being proposed?”*

**Response 3:** Extensive noise testing has been conducted on the MK30 drone across all phases of flight. These tests were carried out in a controlled environment to ensure precise noise measurements were captured. The results of these measurements accurately reflect the expected noise levels from typical operations at each of the four proposed drone operating areas within Wayne County.

**Question 4:** *“If possible, please provide video documentation of the proposed drones, demonstrating their size and noise level.”*

**Response 4:** The MK30 drone, as pictured below, weighs approximately 78 lbs. and has a maximum takeoff weight of 83.2 lbs. It is approximately 6 ft in height.



While video documentation can provide a visual reference for the size and operation of the 3 drone, it is important to note that the sound levels associated with video recordings - whether captured via cellphone or other non-specialized equipment -- is dependent on the volume at which it is played. This means that a recording cannot reliably reflect the actual noise levels produced by the 3 drone. Cellphone microphones do not conform to American National Standards Institute A1 or National Institute of Standards and Technology I standards due to several factors

The miniature size and circuit board placement of built-in cellphone microphones impact their dynamic range and signal-to-noise ratio.

These microphones lack accessibility for periodic or pre-measurements, limiting their ability to produce consistent and accurate results.

The placement of the microphone during recording can affect measured sound levels, as sound reflecting off nearby objects such as trees, walls, and structures can artificially increase recorded noise levels.

For accurate noise measurements, controlled testing environments and specialized equipment are required to ensure precise assessments of drone operation noise levels.

**Question 5:** *“What happens in the event of a drone crash? Is there a risk of fire or explosion?”*

**Response 5:**

Amazon Prime Air is a certificated air carrier, approved by the FAA to conduct commercial drone package deliveries under Part 135, which is the same regulatory framework that governs operators of small-crewed aircraft. As part of this certification, the FAA has reviewed and accepted Amazon's aircraft design, safety systems, and operational procedures. Our drones are built with multiple layers of redundancy and are programmed to safely land if they encounter unexpected conditions during flight. While incidents are rare, our certification requires us to plan for them. In the event of an accident or incident, we activate a formal response protocol, which includes deploying a specially trained internal team and coordinating with local first responders to help protect people and property. Our incident response procedures are part of our operational obligations as a certificated air carrier and reflect the level of planning and coordination necessary to support safe operations under FAA oversight.



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave., SW.  
Washington, DC 20591

Ms. Cassandra Nelson  
Michigan State Historic Preservation Office  
Cultural Resources Management Section  
300 North Washington Square  
Lansing, MI 48913

**Re: AA Responses to July 1, 2020, Request for Additional Information (R2)**

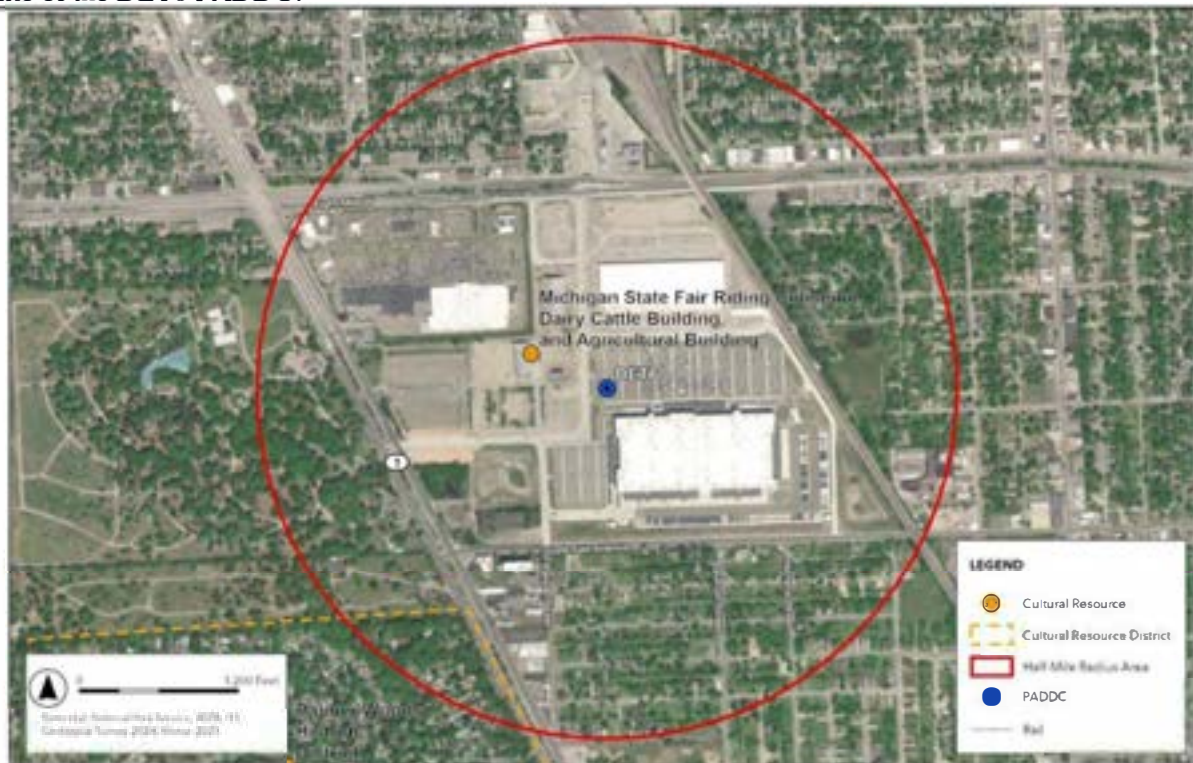
Ms. Nelson,

Thank you for requesting additional information regarding the Amazon Prime Air Drone Project for multiple locations in the Wayne County, MI area (the proposed undertaking). In response to each question provided to our office, we have included the following information regarding the proposed undertaking that should help guide your team in your Section 106 review:

**Question : Mapping that illustrates all National Register listed and eligible properties/districts within a half-mile radius of each of the four Prime Air Drone Delivery Centers (PADDC).**

FAA Response 1:

The following graphic depicts the (only) two NR-listed properties, which are both located within one-half mile of the DET6 PADDC.



**Question 2: Tables that list the National Register listed and eligible properties/districts within a half-mile radius of each of the four PADDs (four separate tables, one for each PADD).**

FAA Response 2

The following table presents the NR-listed properties, both of which are located within one-half mile of the DET6 PADD.

Resource Name	Resource Category	Address/Location	NRHP Status	PADD
Palmer Woods Historic District	District	Roughly bounded by Seven Mile Rd., Woodward Ave., and Strathcona Dr.	listed	DET6
Michigan State Fair Riding Coliseum, Dairy Cattle Building, and Agricultural Building	Building	2 State Fair Ave	listed	DET6
SOURCE: National Park Service, 2012				

**Question 3: Representative photographs of the viewshed to and from these historic resources facing the PADDs.**

FAA Response

The following photographs capture various viewpoints of the NR-listed properties from the DET6 PADD.

View from the DET6 PADD towards the Palmer Woods Historic District (state air art ents, state air , in re d)



View from the DET6 PADDC towards the Michigan State Fair Riding Coliseum, Dairy Cattle Building, and Agricultural Building



Additional view from the DET6 PADDC perimeter (right) towards the Michigan State Fair Riding Coliseum, Dairy Cattle Building, and Agricultural Building (left)



Combined perspective view of the DET6 PADDC (*left*) of the Palmer Historic District (*center, distance*) and the Michigan State Fair Riding Coliseum, Dairy Cattle Building, and Agricultural Building (*right*)



Should you have any additional questions regarding the proposed undertaking, please do not hesitate to contact Christopher Hurst, via email, at 9-faa- [drone-environmental@faa.gov](mailto:drone-environmental@faa.gov).

Sincerely,

**Joseph K. Hemler Jr** Digitally signed by Joseph K. Hemler Jr  
Date: 2025.12.17 11:30:09 -05'00'

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



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
MICHIGAN STRATEGIC FUND  
STATE HISTORIC PRESERVATION OFFICE

QUENTIN L. MESSER, JR.  
PRESIDENT

January 05, 2025

CHRISTOPHER HURST  
ENVIRONMENTAL PROTECTION SPECIALIST  
FEDERAL AVIATION ADMINISTRATION  
SENT ELECTRONICALLY TO: [christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)

RE: ER25-561 Amazon Prime Air MK30 Drone Delivery Operations, Multiple Locations, Wayne County (FAA)

Dear Christopher Hurst:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-cited undertaking at the locations noted above. Based on the information provided for our review, it is the opinion of the State Historic Preservation Officer (SHPO) that the effects of the proposed undertaking do not meet the criteria of adverse effect [36 CFR § 800.5(a)(1)]. Therefore, the project will have **no adverse effect** [36 CFR § 800.5(b)] on historic properties within the area of potential effects for the above-cited undertaking.

This letter evidences FAA's compliance with 36 CFR § 800.4 "Identification of historic properties" and 36 CFR § 800.5 "Assessment of adverse effects," and the fulfillment of FAA's responsibility to notify the SHPO, as a consulting party in the Section 106 process, under 36 CFR § 800.5(c) "Consulting party review." **If the scope of work changes in any way, please notify this office immediately. In the unlikely event that human remains, or archaeological material are encountered during construction activities related to the above-cited undertaking, work must be halted, and the Michigan SHPO and other appropriate authorities must be contacted immediately.**

We remind you that federal agency officials or their delegated authorities are required to involve the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties per 36 CFR § 800.2(d). The National Historic Preservation Act also requires that federal agencies consult with any Indian tribe and/or Tribal Historic Preservation Officer (THPO) that attach religious and cultural significance to historic properties that may be affected by the agency's undertakings per 36 CFR § 800.2(c)(2)(ii).

Finally, the State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. Thank you for this opportunity to review and comment, and for your cooperation.

If you have any questions, please contact Cassandra Nelson, Historian, at 517-648-4050 or by email at [nelsonc32@michigan.gov](mailto:nelsonc32@michigan.gov). **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Ryan M. Schumaker  
State Historic Preservation Officer

RMS:SSE:CLN

copy: Jim Fitzpatrick, Amazon Prime Air  
Neal Wolfe, Environmental Science Associates



## **D-2 Tribal Consultation**



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave., SW.  
Washington, DC 20591

President Whitney Gravelle  
Bay Mills Indian Community  
12140 West Lakeshore Dr.  
Brimley, MI 49715

Transmitted via e-mail and mail: [wgravelle@baymills.org](mailto:wgravelle@baymills.org)

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

Dear President Gravelle,

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 Michigan. 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 Detroit, MI 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**

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 Bay Mills Indian Community 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](mailto: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,

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

Enclosure:  
Attachment A – Section 106 Consultation Package

CC: Paula Carrick  
Tribal Historic Preservation Officer

**Attachment A**  
**Section 106 Consultation Package**



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave., SW.  
Washington, DC 20591

Ms. Paula Carrick  
Tribal Historic Preservation Officer  
Bay Mills Indian Community  
12140 West Lakeshore Dr.  
Brimley, MI 49715

*Transmitted via e-mail and mail: [paulacarrick@baymills.org](mailto:paulacarrick@baymills.org)*

Dear Paula Carrick,

The Federal Aviation Administration (FAA) is currently evaluating Amazon Prime Air's proposal to conduct commercial drone delivery operations in the Detroit, MI 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 Bay Mills Indian Community 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 Detroit, MI 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 each of four proposed PADDCs located throughout the Detroit 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 7 A.M. and 10 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 has been coordinated with the Michigan SHPO and would be limited to areas near Detroit, MI, which includes densely populated or congested regions. 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. 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](mailto:9-faa-drone-environmental@faa.gov) within 30 days of receipt of this letter.

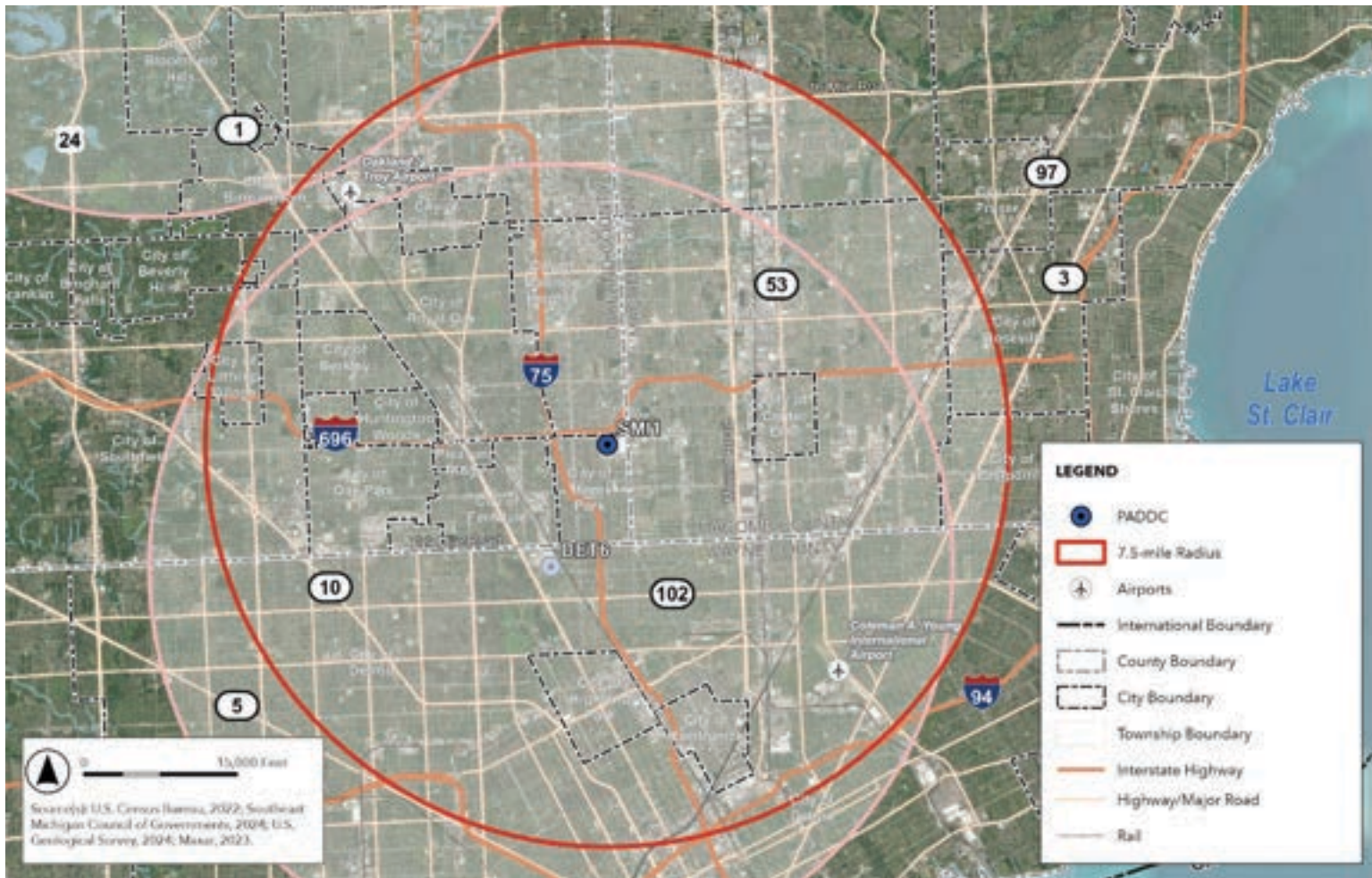
Sincerely,

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

Enclosure:  
Attachment A – Proposed Area of Potential Effects

**Attachment A**  
**Proposed Area of Potential Effects**





SOURCE: ESA, 2024; Maxar, 2022; US Census Bureau, 2021; US Geological Survey, 2022.

Environmental Assessment for Amazon Prime Air — Detroit, MI

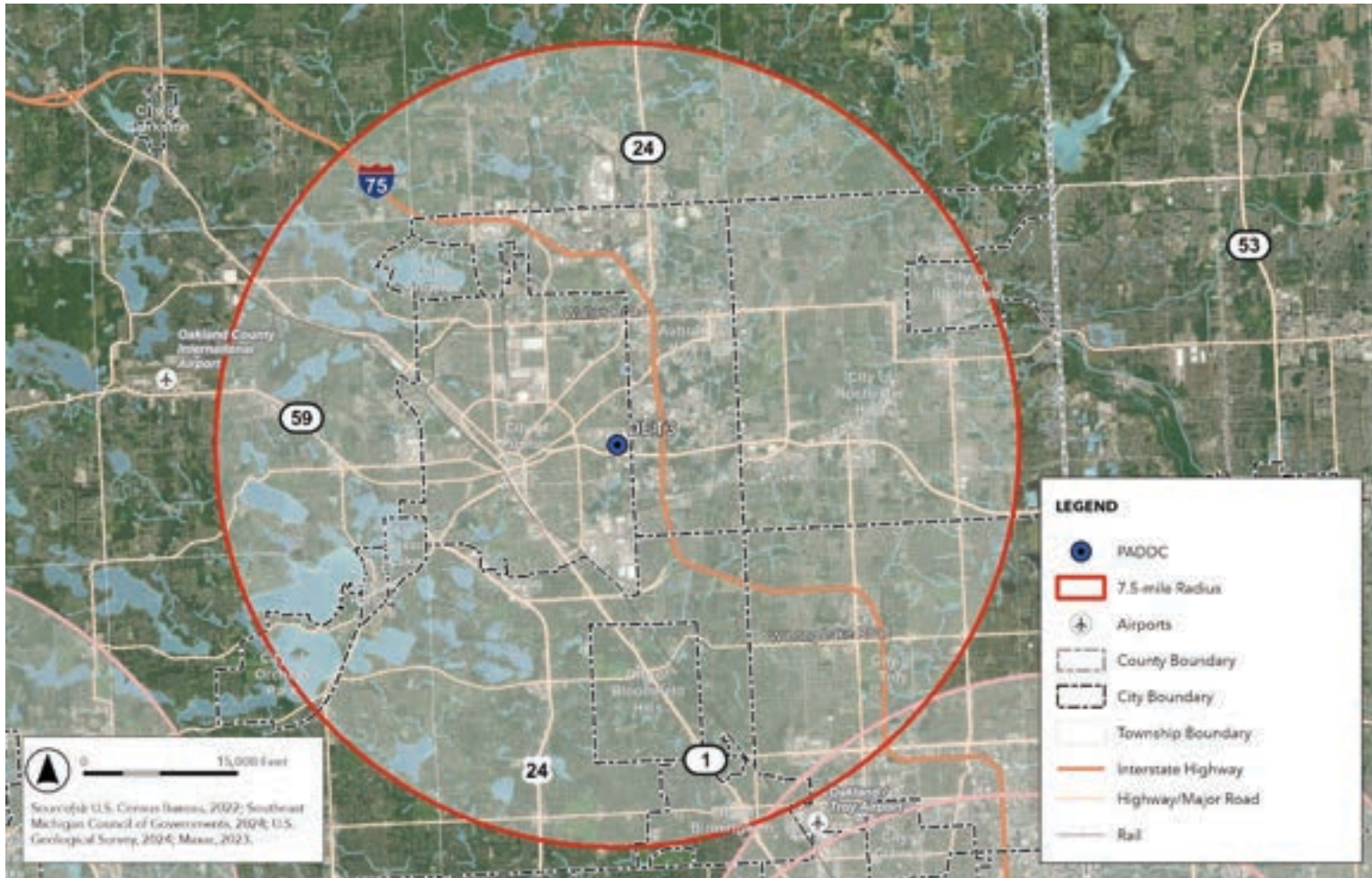
**Area of Potential Effects**  
**SMI1 Drone Operation Study Area**



SOURCE: ESA, 2024; Maxar, 2022; US Census Bureau, 2021; US Geological Survey, 2022.

Environmental Assessment for Amazon Prime Air — Detroit, MI

**Area of Potential Effects**  
STW1 Drone Operation Study Area



SOURCE: ESA, 2024; Maxar, 2022; US Census Bureau, 2021; US Geological Survey, 2022.

Environmental Assessment for Amazon Prime Air — Detroit, MI

**Area of Potential Effects**  
DET3 Drone Operation Study Area



SOURCE: ESA, 2024; Maxar, 2022; US Census Bureau, 2021; US Geological Survey, 2022.

Environmental Assessment for Amazon Prime Air — Detroit, MI

**Area of Potential Effects**  
 DET6 Drone Operation Study Area



July 1, 2025

Derek Hufty  
Manager, General Aviation and Commercial Branch  
Federal Aviation Administration/U. S Department of Transportation  
800 Independence Avenue, Washington, DC 20591

Re: FAA Drone Operations in Detroit, Michigan

Dear Mr. Hufty,

The Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians' Tribal Historic Preservation Office has received the Section 106 consultation request for comments regarding a proposed drone operations project in Detroit, Wayne County, Michigan. At present, we are not providing any additional comments. We have not identified any information concerning the presence of any cultural resources significant to the Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians within the Area of Potential Effect (APE). This is not to say that such a site may not exist, just that this office does not have any available information for the area(s) at this point in time.

This office will be available to assist you in the future or during the course of this project if there is an unanticipated encounter with human remains, funerary objects, and artifacts. The subsequent identification of additional historic properties affected by the undertaking will require reinitiating Section 106 consultation related to all ongoing and proposed project work and the handling of "discoveries" per the National Historic Preservation Act (NHPA) implementing regulations, 36 CFR Part 800, and, as applicable, the Native American Graves and Repatriation Act (NAGPRA) and its implementing regulations, 43 CFR Part 10. In the event of an encounter with unanticipated human remains, funerary objects, and artifacts we request to be notified within 72 hours. At that time, the Tribe will determine if further consultation is necessary.

Please contact our office with any further questions or requests at 269-397-1780 or [Section106@glt-nsn.gov](mailto:Section106@glt-nsn.gov). Also, keep in mind that there may be other Tribal Nations, including the Wyandotte Nation (Sherri Clemons, THPO, [sclemons@wyandottenation.org](mailto:sclemons@wyandottenation.org)) and the Nottawaseppi Huron Band of the Potawatomi (Onyleen Zapata, THPO, [Onyleen.Zapata@nhbp-nsn.gov](mailto:Onyleen.Zapata@nhbp-nsn.gov)), that may have an interest or knowledge of cultural resources within the APE that we may not know about. We thank you for including the Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians in your consultation efforts and planning processes.

Sincerely,

A handwritten signature in cursive script that reads "Lakota Hobia".

Lakota Hobia  
Tribal Historic Preservation Officer  
[Lakota.Hobia@glt-nsn.gov](mailto:Lakota.Hobia@glt-nsn.gov)  
[Section106@glt-nsn.gov](mailto:Section106@glt-nsn.gov)

CC: Christopher Hurst, Federal Aviation Administration, [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov)

**From:** [Neal Wolfe](#)  
**To:** [Marcella Hadden](#); [Hurst, Christopher A \(FAA\)](#)  
**Cc:** [Tim Davis](#); [William Johnson](#); [Hemler, Joseph K Jr \(FAA\)](#); [Lares, Sheri \(FAA\)](#); [DeLaune, Jonathan \(FAA\)](#); [Fitzpatrick, Jim](#); [Jones, Jodi A-CTR \(FAA\)](#); [Patrick Hickman](#)  
**Subject:** RE: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Detroit, MI.  
**Date:** Tuesday, May 13, 2025 5:06:30 PM

---

Hi Everyone,

I just checked Doodle and it looks not everyone has voted, but it appears we have enough for an unofficial quorum. I'll send out a date/time calendar invite tomorrow. If anyone hasn't voted and wants to attend, please do so.

Thanks!

Neal

**Neal Wolfe JD, CEM**

Director of Aviation Sustainability and Resilience

**ESA | Environmental Science Associates**

859.757.5317 **cell**

407-403-6300 **direct**

---

**From:** Marcella Hadden <MIHadden@sagchip.org>

**Sent:** Wednesday, May 7, 2025 10:50 AM

**To:** Neal Wolfe <NWolfe@esassoc.com>; Hurst, Christopher A (FAA) <Christopher.A.Hurst@faa.gov>

**Cc:** Tim Davis <TDavis@sagchip.org>; William Johnson <WJohnson@sagchip.org>; Hemler, Joseph K Jr (FAA) <Joseph.K.Hemler-Jr@faa.gov>; Lares, Sheri (FAA) <sheri.lares@faa.gov>; DeLaune, Jonathan (FAA) <jonathan.delaune@faa.gov>; Fitzpatrick, Jim <fitzpkja@amazon.com>; Jones, Jodi A-CTR (FAA) <jodi.a-ctr.jones@faa.gov>; Patrick Hickman <PHickman@esassoc.com>

**Subject:** RE: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Detroit, MI.

Please put it out a little a little further – 1<sup>st</sup> or 2<sup>nd</sup> week of June please.



*Marcella L Hadden*  
TRIBAL HISTORIC PRESERVATION OFFICER  
Saginaw Chippewa Indian Tribe of Michigan

Tribal Historic  
Preservation Office  
6650 E. Broadway  
Mt. Pleasant, MI 48858

 989.775.4751

 mlhadden@sagchip.org

**From:** Neal Wolfe [<mailto:NWolfe@esassoc.com>]

**Sent:** Wednesday, May 07, 2025 10:44 AM

**To:** Hurst, Christopher A (FAA) <[Christopher.A.Hurst@faa.gov](mailto:Christopher.A.Hurst@faa.gov)>; Marcella Hadden <[MIHadden@sagchip.org](mailto:MIHadden@sagchip.org)>

**Cc:** Tim Davis <[TDavis@sagchip.org](mailto:TDavis@sagchip.org)>; William Johnson <[WJohnson@sagchip.org](mailto:WJohnson@sagchip.org)>; Hemler, Joseph K Jr (FAA) <[Joseph.K.Hemler-Jr@faa.gov](mailto:Joseph.K.Hemler-Jr@faa.gov)>; Lares, Sheri (FAA) <[sheri.lares@faa.gov](mailto:sheri.lares@faa.gov)>; DeLaune, Jonathan (FAA) <[jonathan.delaune@faa.gov](mailto:jonathan.delaune@faa.gov)>; Fitzpatrick, Jim <[fitzpkja@amazon.com](mailto:fitzpkja@amazon.com)>; Jones, Jodi A-CTR (FAA) <[jodi.a-ctr.jones@faa.gov](mailto:jodi.a-ctr.jones@faa.gov)>; Patrick Hickman <[PHickman@esassoc.com](mailto:PHickman@esassoc.com)>

**Subject:** [External E-Mail] RE: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Detroit, MI.

**CAUTION: This email originated from outside of the organization. Do not click links, open attachments or reply unless you recognize the sender and know the content is safe.**

Hi Marcella,

Thank you for reaching out! As Chris said, I'm leading the consultant team assisting Amazon and the FAA perform the environmental analysis for this project. Given the large number of folks copied on this email, it might be useful if I send out an online Doodle poll to help schedule a convenient time for us to talk. I'm thinking sometime during the week of 5/12 (next week) or the week of 5/19. If either of those weeks are bad for you, please let me know and I can push out the scheduling calendar a little bit further.

Thanks,

Neal

**Neal Wolfe JD, CEM**

Director of Aviation Sustainability and Resilience

ESA | Environmental Science Associates

859.757.5317 cell

407-403-6300 direct

---

**From:** Hurst, Christopher A (FAA) <[Christopher.A.Hurst@faa.gov](mailto:Christopher.A.Hurst@faa.gov)>

**Sent:** Monday, May 5, 2025 3:59 PM

**To:** [MIHadden@sagchip.org](mailto:MIHadden@sagchip.org)

**Cc:** [TDavis@sagchip.org](mailto:TDavis@sagchip.org); [WJohnson@sagchip.org](mailto:WJohnson@sagchip.org); Hemler, Joseph K Jr (FAA) <[Joseph.K.Hemler-Jr@faa.gov](mailto:Joseph.K.Hemler-Jr@faa.gov)>; Lares, Sheri (FAA) <[sheri.lares@faa.gov](mailto:sheri.lares@faa.gov)>; DeLaune, Jonathan (FAA) <[jonathan.delaune@faa.gov](mailto:jonathan.delaune@faa.gov)>; Fitzpatrick, Jim <[fitzpkja@amazon.com](mailto:fitzpkja@amazon.com)>; Jones, Jodi A-CTR (FAA) <[jodi.a-ctr.jones@faa.gov](mailto:jodi.a-ctr.jones@faa.gov)>; Neal Wolfe <[NWolfe@esassoc.com](mailto:NWolfe@esassoc.com)>

**Subject:** FW: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Detroit, MI.

Good afternoon,

Thank you for your response. Neal Wolfe is the consultant supporting this proposal. Neal and his team will be reaching out with your office to setup up a meeting.

We look forward to discussing.

Very respectfully,

Chris Hurst

REM/CEA/CESCO

Environmental Protection Specialist

AFS-752

General Aviation and Commercial Branch

Emerging Technologies Division

Office of Safety Standards, Flight Standards Service

[christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)

CST

---

**From:** Marcella Hadden <[MIHadden@sagchip.org](mailto:MIHadden@sagchip.org)>

**Sent:** Monday, May 5, 2025 2:01 PM

**To:** 9-FAA-Drone-Environmental (FAA) <[9-FAA-Drone-Environmental@faa.gov](mailto:9-FAA-Drone-Environmental@faa.gov)>; Tim Davis <[TDavis@sagchip.org](mailto:TDavis@sagchip.org)>

**Cc:** Hurst, Christopher A (FAA) <[Christopher.A.Hurst@faa.gov](mailto:Christopher.A.Hurst@faa.gov)>; DeLaune, Jonathan (FAA) <[jonathan.delaune@faa.gov](mailto:jonathan.delaune@faa.gov)>; Jones, Jodi A-CTR (FAA) <[jodi.a-ctr.jones@faa.gov](mailto:jodi.a-ctr.jones@faa.gov)>; William Johnson <[WJohnson@sagchip.org](mailto:WJohnson@sagchip.org)>

**Subject:** RE: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Detroit, MI.

**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.

---

Yes, I would like to consult. There are sacred sites where ceremonies are ongoing and the sight of a drone, noise or something falling from the sky would be very distracting.



*Marcella L Hadden*  
TRIBAL HISTORIC PRESERVATION OFFICER  
Saginaw Chippewa Indian Tribe of Michigan

Tribal Historic  
Preservation Office  
6650 E. Broadway  
Mt. Pleasant, MI 48858

 989.775.4751

 mlhadden@sagchip.org

**From:** 9-FAA-Drone-Environmental (FAA) [<mailto:9-FAA-Drone-Environmental@faa.gov>]

**Sent:** Friday, May 02, 2025 4:37 PM

**To:** Tim Davis <[TDavis@sagchip.org](mailto:TDavis@sagchip.org)>; Marcella Hadden <[MHadden@sagchip.org](mailto:MHadden@sagchip.org)>

**Cc:** Hurst, Christopher A (FAA) <[Christopher.A.Hurst@faa.gov](mailto:Christopher.A.Hurst@faa.gov)>; DeLaune, Jonathan (FAA) <[jonathan.delaune@faa.gov](mailto:jonathan.delaune@faa.gov)>; Jones, Jodi A-CTR (FAA) <[jodi.a-ctr.jones@faa.gov](mailto:jodi.a-ctr.jones@faa.gov)>

**Subject:** [External E-Mail] FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Detroit, MI.

**CAUTION: This email originated from outside of the organization.  
Do not click links, open attachments or reply unless you recognize the  
sender and know the content is safe.**

*Consultation Package sent via Email and Regular Mail*

*Attachment – Government-to-Government consultation letter and National Historic Preservation Act (NHPA) Section 106 Consultation Package*

Good afternoon,

My name is Chris Hurst and I am an environmental specialist with the Federal Aviation Administration (FAA). The purpose of this email is to initiate formal government-to-government and National Historic Preservation Act (NHPA) Section 106 consultations regarding a proposal by Amazon Prime Air. The FAA is considering whether to authorize expanded commercial Unmanned Aircraft Systems (UAS) operations 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 Michigan. The FAA is the lead federal agency for the proposed project. Amazon Prime Air is the project proponent. We wish to solicit your views regarding potential effects on tribal interests in the area.

The primary purpose of government-to-government and NHPA Section 106 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.

### **Consultation Initiation**

With this consultation package (*attached and also transmitted via regular mail*), 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**

Amazon Prime Air is working with the FAA to prepare an environmental assessment to assess the potential environmental impacts of the FAA's actions of authorizing commercial package delivery operations using drones in the state of Michigan. Generally, these approvals are associated with issuing a new or amended Part 135 air carrier Operations Specifications as the operative approval. The FAA has determined that its proposed action, which would encompass all FAA approvals necessary to enable expanded operations, is an **undertaking** as defined under the regulations implementing Section 106 of the NHPA (36 CFR § 800.16(y)). The FAA intends to complete consultation for Section 106 of the NHPA concurrently with the NEPA process.

### **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**

Your timely response over the next 30 days will greatly assist us in incorporating your concerns into our environmental review of the operation. We respectfully request your response in the event that the Saginaw Chippewa Indian Tribe of Michigan would like to consult with the FAA in a government-to-government relationship about this proposal.

Please contact FAA via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov) with any questions or concerns.

Very respectfully,

Chris Hurst  
REM/CEA/CESCO  
Environmental Protection Specialist

AFS-752  
General Aviation and Commercial Branch  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service  
[christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)

CST