

# Appendix F

## **Public Comments**



# PUBLIC COMMENTS RECEIVED ON THE DRAFT EA AND FAA RESPONSES

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## Introduction

This appendix includes a summary of public comments received on the FAA’s January 2026 Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Detroit, MI (Draft EA). The NOA announcing the public availability of the Draft EA was published on the FAA’s website on January 19, 2026, which included a public review and comment period through February 17, 2026.

In total, the FAA received 6 comment submissions. When multiple topics were discussed in a single comment submission, each topic was individually identified and addressed through the use of bracketed letters (e.g., [A], [B], etc.). Commenters were notified that any personally identifiable information included as part of their comment submission could be made publicly available, but the FAA has attempted to redact personally identifiable information when requested. The comments are presented exactly as they were received and may contain typographical errors and/or misspellings. They have not been edited in any way and are provided in this manner to show that they were quoted exactly as they were in their original form.

## Public Comments and FAA Responses

Public Comment No.	Commenter Name
01_AUVSI	Association for Uncrewed Vehicle Systems International (AUVSI)
02_COB	City of Birmingham (COB)
03_CDA	Commercial Drone Alliance (CDA)
04_Felder	John Felder
05_SUC	Small UAV Coalition (SUC)
06_WFD	Warren Fire Department (WFD)
07_WPD	Warren Police Department (WPD)

## Public Comment – 01\_AUVSI

Hello -

*Please find attached comments from the Association for Uncrewed Vehicle Systems International (AUVSI) on the Amazon Prime Air Detroit, MI Draft Environmental Assessment. We appreciate the opportunity to comment and look forward to the FAA's positive decision. Should you need anything else, please do not hesitate to reach out.*

*Best,*

*Alex*

*Alexander Laska | Director, Government Affairs (Air)  
Association for Uncrewed Vehicle Systems International | 3100 Clarendon Boulevard, Suite 1200,  
Arlington, VA, 22201*

*Phone: +1 571 255 7781*

*(Transcript of email attachment follows)*

*February 17, 2026*

*Federal Aviation Administration, Suite 802W  
C/O AVS Environmental  
800 Independence Ave SW  
Washington, DC 20591  
Attn: 9-faa-drone-environmental@faa.gov*

*Re: Notice of Availability, Notice of Public Comment Period, and Request for Comment on the Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Detroit, MI*

*Association for Uncrewed Vehicle Systems International Comment*

*The Association for Uncrewed Vehicle Systems International (AUVSI), the world's largest non-profit devoted exclusively to advancing the uncrewed systems and robotics community, supports the amendment by Amazon Prime Air to its Part 135 Air Carrier Operation Specifications (OpSpec) to expand its package delivery operations, utilizing their MK30 drone, to the Detroit, MI area from four new Prime Air Drone Delivery Centers (PADDCs). Since launching Amazon Prime Air in 2022, the company has been steadfast in its mission to create a safe and scalable way to deliver packages to customers quickly using highly autonomous drones. Amazon Prime Air has demonstrated a sustained commitment to operating safely and in compliance with FAA requirements, and AUVSI supports the proposed amendment as a reasonable extension of those compliant operations.*

*Thousands of businesses, large and small, across the country, are embracing innovative technologies, such as drones to enhance efficiency, keep people safe, reduce environmental impacts, and provide new workforce opportunities. These technologies are being deployed within existing FAA regulatory*

*frameworks to enhance safety, operational efficiency, and system resiliency in the National Airspace System. AUVSI and its members, including Amazon Prime Air, work closely with the U.S. government to ensure their delivery operations remain safe and compliant with federal regulations. It is our goal to empower our member companies to do what they do best: continue to push the envelope of cutting-edge technology in the Uncrewed Aircraft Systems (UAS) sector and bring widespread benefits to the American people. To accomplish that, it is important that regulatory processes are implemented in a manner that is predictable, risk-based, and aligned with demonstrated operational performance.*

*As indicated in the Notice of Availability (NOA), “The FAA’s approval of the amended OpSpec is considered a major federal action under NEPA and requires a NEPA review.” AUVSI has worked closely with its members to support effective participation in the NEPA process and to ensure that environmental reviews accurately reflect the operational realities of UAS deployment to ensure U.S. leadership and growth. Expanding the use of drones can have significant environmental benefits, from reducing carbon-emitting truck traffic to providing new ways for those with mobility challenges or living within food deserts to access goods. The environmental benefits provided by expanding the use of drones are the very reason why it is important to ensure the environmental review process works effectively and in a timely manner. Based on the scope of the proposed action and the mitigations described in the Draft EA, the analysis appropriately supports a Finding of No Significant Impact (FONSI).*

*It is noteworthy that Amazon Prime Air has been successfully operating since 2022, thereby demonstrating the viability of its concepts of operations within existing FAA regulatory frameworks. Amazon Prime Air’s amendment to its Part 135 OpSpec is a reasonable extension of this ongoing regulatory compliance. The proposed action in the FAA’s draft Environmental Assessment (EA) of amending the OpSpec will enable Amazon Prime Air to bring their service and the associated benefits to the Detroit, MI community. AUVSI believes the Draft EA supports the issuance of a FONSI and associated Record of Decision (ROD) to grant appropriate airspace access to the MK30 in the proposed operating area.*

*AUVSI supports the FAA’s proposed action of amending Amazon Prime Air’s Part 135 OpSpec to expand its package delivery operations, and associated social, environmental, and commercial benefits, in the Detroit, MI area. Thank you for the opportunity to comment.*

*Respectfully Submitted,*

*Michael Robbins  
President and CEO  
AUVSI*

## **FAA Response – 01\_AUVSI**

Thank you for your comment. The FAA has noted your general support for the Proposed Action.

## Public Comment – 02\_COB

Hello,

*I am writing to provide comments on behalf of the City of Birmingham on the Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Detroit, MI (the "report"). I have reviewed the documents and submit the following comments/concerns related to the proposal:*

**[A]** *1. The City of Birmingham is within the range of 3 proposed drone PADDC's - DET3, DET6 and SMII. There is a small portion of Birmingham at the SW corner that is not included in the service range. Due to Birmingham's location in relation to the PADDC's, much of the experience in Birmingham will be an end point as opposed to overflights en route to another community in the service area. Generally speaking, the report does not specifically distinguish between different types of service areas along the paths of these drones and any unique effects therein, nor did I see that it describes the relationships between intersecting drone paths emanating from different PADDC's and service areas. This is of interest to Birmingham.*

**[B]** *2. Although the report discusses the introduction of PrimeAir's drone delivery services in the Detroit area (appears to be a brand new service in the area, not an expansion of a pilot-type program) it did not provide a review of any FAA experiences with PrimeAir's drone delivery services in other comparable areas, whether with the MK30 model or previous models. It would have been helpful to understand real-life results from other areas as opposed to simply a review of reasonably foreseeable effects.*

**[C]** *3. Much of the concern in Birmingham will be noise. I understand that the MK30 drone is designed to be quiet, and that operating altitude along the flight path may be high enough to reduce or eliminate the concern for a single drone. However, there are a few factors that I found missing or lacking in the report.*

*Firstly, based on PrimeAir's proposed 1,000 trips a day, I am concerned that an average person in the service area will not only experience an occasional overflight, but many in a given day. For those communities with overlapping service areas, it appears like it could be double. This would be alongside any nearby deliveries.*

**[D]** *Second, the report reviewed decibel impacts from the PADDC's, during flight, and upon delivery, all of which appear to be minimal. However, it is unclear to me how multiple drones firing at once may impact or change sound effects. I am also concerned about how any deferred maintenance of the drones may change or increase sound emissions. There is no discussion of required maintenance in the report.*

*Finally, unless it is buried in the appendices, I feel as though the type/frequency of sound emitted from drones was not considered in the report. It is my understanding that fast-moving, high rpm drone motors emit higher frequency sounds, which are perceived differently than other frequencies, even those in the same decibel range. These sounds are NOT generally a part of normal day-to-day life in noise sensitive areas and would certainly have effects beyond occasional annoyances.*

**[E]** *4. The proposed operating window of 6 AM to 10:30 PM is too broad for a new service in this area. There should absolutely be stricter limitations to the operating window to ensure that the FAA and PrimeAir can together assess the viability and safety of drone delivery options without harm to its*

*adjacent communities and fully meet its compliance obligations. Limiting the operating window at the beginning will allow the FAA and service area communities to have an opportunity to measure any effects before granting PrimeAir its full desired operations.*

*Thank you for your consideration.*

*Nicholas J. Dupuis*

*Planning Director*

*Email: ndupuis@bhamgov.org*

*Office: 248-530-1856*

*Social: LinkedIn*

## FAA Response – 02\_COB

Thank you for your comments.

[A] **Section 3.6** and the Technical Noise Report found in **Appendix E** of the Draft EA present the noise exposure estimates associated with the individual delivery, en route, and PADCC operational flight phases in addition to total overall noise exposure from the Proposed Action. Additionally, the Draft EA evaluates the noise exposure that may occur when two MK30 drone operating areas overlap and interact, which is the maximum number of overlaps that would occur in the Study Areas associated with the SIM1 and DET6 PADCCs, and SIM1 and DET3 PADCCs, respectively.

For PADCC operations, the Draft EA evaluated the anticipated average daily maximum of 1,000 deliveries provided by Prime Air for each PADCC, with 100 of the 1,000 daily deliveries (10%) occurring during the periods from 6 a.m. to 7 a.m. and 10 p.m. to 10:30 p.m. This is equivalent to 1,900 daytime equivalent delivery operations, and the extent of noise exposure associated with PADCC operations is shown in **Figures 3-1** through **3-4** and presented in **Table 3-4** in the Draft EA.

For Enroute operations, the Draft EA conservatively assumed that a maximum number of overflights over any one location would be half, or 500 daily delivery overflights with approximately 50 of the 500 daily delivery overflights (10%) occurring during the periods from 6 a.m. to 7 a.m. and 10 p.m. to 10:30 p.m. When combined with the daytime delivery overflight operations, this would be representative of a combined total of 950 daytime equivalent delivery overflight operations. It was conservatively assumed that when two MK30 drone operating areas overlap, overflights associated with an additional 950 daytime equivalent deliveries would be estimated, per operating area overlap. As detailed in the Draft EA, en route noise levels could reach DNL 46.0 dB in any location within the Study Areas, and for areas where two operating areas overlap, the estimated en route noise levels could reach 48.9 dB, respectively.

For Delivery operations, the Draft EA developed a minimum and maximum representative average annual daily distribution of deliveries that could occur at a single delivery location within each operating area. The distribution of average annual daily deliveries ranges from one to four deliveries per operating day and conservatively assumes that at least one delivery will occur during the nighttime period between 6 a.m. and 7 a.m. and 10 p.m. and 10:30 p.m. This nighttime delivery is equivalent to 10 daytime deliveries, and when combined with daytime deliveries, is equivalent to a total combined maximum of 13 equivalent daytime delivery operations. The noise exposure for delivery operations includes outbound and inbound

en route overflights at the typical operating altitude range of 180 to 377 ft AGL for operations associated with deliveries to other locations, including overflights associated with overlaps from up to two operating areas. The noise exposure for any one delivery point (with en route noise as mentioned above) is presented in **Table 3-5** of the draft EA.

When considering the overall noise exposure from the combination of the individual delivery, en route, and PADCC operational flight phases, the maximum noise exposure levels within the operating area would occur at the PADCC site where noise levels at or above DNL 50 dB would extend approximately 1,050 ft from each PADCC. Noise levels at or above DNL 65 dB would extend approximately 150 ft from the PADCC. No residential or other noise sensitive receivers would be exposed to noise levels of DNL 50 dB or greater associated with PADCC operations. Additionally, the estimated noise exposure for en route operations could reach up to DNL 46 dB at any location within the action area for a single PADCC operating area, and when two PADCC operating areas overlap, the estimated en route noise could reach up to DNL 48.9 dB, respectively. Lastly, the resulting noise exposure at any residential-zoned property line would not be expected to exceed DNL 50.1 dB, even in instances where there is overlap between two PADCC operating areas. As noted in the Draft EA, overall noise impacts from operations are not expected to be significant and are not expected to be incompatible with noise sensitive resources within each operating area. For additional details regarding the noise analysis for the Proposed Action, please refer to **Section 3.6** of the Draft EA.

**[B]** To date Prime Air has experienced positive feedback from communities in which it has introduced drone delivery operations as evidenced by strong initial consumer demand. In most areas where Prime Air has commenced drone delivery operations, it is delivering over 300 packages per day and has only received a small number of concerns from residents. In instances where there are concerns regarding Prime Air's drone operations, the FAA encourages state and local governments and the public to engage with Prime Air directly. Requests or concerns may be relayed to Prime Air via email at [amazondronefeedback@amazon.com](mailto:amazondronefeedback@amazon.com) or by calling 888-283-0587.

**[C]** As detailed in **Section 3.6** of the Draft EA, it was conservatively assumed that for en route operations, a maximum number of overflights over any one location in the Study Areas would be 500, which is half of the anticipated total of 1,000 daily deliveries associated with each PADCC and operating area. Since each delivery involves both an outbound and inbound flight path, 500 deliveries equates to 1,000 daily en route overflights, with approximately 100 of the 1,000 overflights (10%) occurring during the periods from 6 a.m. to 7 a.m. and 10 p.m. to 10:30 p.m. For the locations in the Study Areas where two MK30 drone operating areas overlap, overflights associated with an additional 500 deliveries would be estimated, per operating area overlap, for a maximum combined total of 1,000 daily deliveries which equates to 2,000 daily en route overflights that could occur over any single location.

Although it is possible any location in the Study Areas could experience up to 2,000 daily en route overflights, each PADCC is located at a centralized location within each proposed operating area, and delivery locations would be distributed throughout the proposed operating areas. This will have the effect of dispersing operations throughout each of the proposed operating areas. In addition, Prime Air's flight planning software is designed to avoid areas designated as No-Fly Zones. With the diversification of flight paths due to dispersed deliveries and the avoidance of No-Fly Zones, the frequency of overflights will inversely scale as the distance from a PADCC increases and dispersing operations.

**[D]** The noise impacts from the simultaneous operations of multiple drones is taken into account in the calculation of DNL. The DNL metric takes into account both the amount of noise from each aircraft operation as well as the total number of operations flying throughout the day and applies an additional 10 dB weighting for operations that occur between the hours of 10 p.m. and 7 a.m. For additional details regarding the noise analysis for the Proposed Action, please refer to **Section 3.6** of the Draft EA.

The FAA uses the A-Weighted sound level to calculate DNL consistent with the Environmental Protection Agency's (EPA) recommendations as detailed in the 1974 report entitled "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety". The 1974 EPA report, often referred to as the "Levels Document", stated that a frequency-weighted sound pressure level is the most appropriate choice for describing the magnitude of environmental noise. The EPA also concluded that:

- The A-Weighted sound level has been shown to correlate well with human response to noise,
- has been widely used for describing transportation and community noise exposure, and
- can be easily measured by sound monitoring equipment and represents the most suitable choice for quantifying noise exposure levels.

In addition to use of the A-weighted sound level, the 1974 EPA report recommended the DNL metric as the best metric to describe the effects of environmental noise in a simple, uniform, and appropriate way. The EPA noted that representing a fluctuating noise level in terms of a steady state noise having an equivalent energy content, such as is the case with the DNL metric, accurately describes the onset of noise-induced hearing loss and is supported by substantial evidence that correlates with annoyance for a variety of circumstances as it relates to environmental noise.

The FAA's use of the A-weighted sound level and the DNL metric is also consistent with the findings of the June 1980 Federal Interagency Committee on Urban Noise (FICUN) report entitled "Guidelines for Considering Noise in Land Use Planning and Control." The 1980 FICUN report was adopted by the U.S. Department of Transportation (DOT) and the U.S. Environmental Protection Agency (EPA), both of which were FICUN members. FAA represented DOT at proceedings of FICUN and continues to coordinate across the Federal government to carry out interagency coordination on matters related to aviation noise research including with FICUN's successor bodies.

Additionally, the FAA Reauthorization Act of 2018 (the Act) (Pub. L. 115-254) (Section 188) directed the FAA to submit a report evaluating alternative noise metrics to the current DNL standard.<sup>1</sup> The report includes information on the A-Weighted sound level and DNL used to inform federal policies as it relates to aircraft noise. The FAA has considered the use of other noise metrics as a supplement to DNL, such as Number Above (NA) a Maximum Sound Level (Lmax) as detailed in the report referenced above, for quantifying the noise exposure from UA operations. However, due to the low noise levels associated with UA operations, DNL, to-date, has represented a better metric for quantifying noise exposure for UA. As DNL is a cumulative noise metric, it considers the additive effect of multiple noise events including duration and loudness of the event regardless of if the event exceeds a specified sound level threshold.

<sup>1</sup> See "Report to Congress on an Evaluation of Alternative Noise Metrics": [https://www.faa.gov/sites/faa.gov/files/about/plans\\_reports/congress/Day-Night\\_Average\\_Sound\\_Levels\\_COMPLETED\\_report\\_w\\_letters.pdf](https://www.faa.gov/sites/faa.gov/files/about/plans_reports/congress/Day-Night_Average_Sound_Levels_COMPLETED_report_w_letters.pdf).

Other supplemental noise metrics such as Number Above Lmax (NALmax) only account for noise exposure if a specified Lmax is exceeded, and as such do not sufficiently capture the additive effect of exposure to repeated low noise operations such as is the case with UA.

Prime Air conducts extensive maintenance checks on the drones before and after each flight, ensuring both the continuous, safe operation of the drones and the avoidance of operating conditions that may increase engine and propeller noise resulting from deferred maintenance.

[E] In accordance with 49 U.S.C. § 40103(a)(1), “[t]he United States Government has exclusive sovereignty of airspace of the United States.” Congress has provided the FAA with exclusive authority to regulate airspace in the United States, as well as aviation safety, the efficiency of navigable airspace, and air traffic control through Title 49, Subtitle VII of the United States Code (U.S.C.). Because a drone is considered an aircraft under both 49 U.S.C. § 44801 and 14 Code of Federal Regulations, any drone flown outdoors is subject to FAA regulation. In addition, 49 U.S.C. § 40103(a)(2) dictates that airspace is public space, stating that “A citizen of the United States has a public right of transit through the navigable airspace.” As such, the FAA regulates drone operations to ensure the safe and efficient use of navigable airspace, while also considering the public’s right of transit through the airspace.

The FAA does not select the locations for commercial drone operators to conduct operations, nor the hours in which they choose to conduct operations. Location and hours of operation are selected by the operators. The Proposed Action, including the identified hours of operation between 6 a.m. and 10:30 p.m., are also needed to meet consumer demand for package deliveries. See **Section 1.4** for more information.

## Public Comment – 03\_CDA

*Please see the attached comments of the Commercial Drone Alliance (CDA) to the FAA’s Notice of Availability, Notice of Public Comment Period, and Request for Comment on the Draft Environmental Assessment for Amazon Prime Air Drone Package Delivery Operations in Detroit, Michigan.*

*Best regards,*

*Matt Clark*

*Policy Advisor, CDA*

*Matthew Clark*

*Counsel*

*Hogan Lovells US LLP*

*Columbia Square*

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*(Transcript of email attachment follows)*

*February 17, 2026*

*Submitted electronically via Email to 9-FAA-Drone-Environmental@faa.gov*

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

*Re: Commercial Drone Alliance Comment on the Draft Environmental Assessment for Amazon Prime Air Drone Package Delivery Operations in Detroit, Michigan*

*To Whom it May Concern:*

*The Commercial Drone Alliance (“CDA”)<sup>1</sup> appreciates the opportunity to submit comments on the Federal Aviation Administration’s (“FAA”) “Notice of Availability, Notice of Public Comment Period, and Request for Comment on the Draft Environmental Assessment for Amazon Prime Air Drone Package Delivery Operations in Detroit, Michigan” (hereafter the “Draft EA”). For the reasons set forth below, the CDA strongly supports the FAA’s efforts to authorize unmanned aircraft systems (“UAS” or “drone”) commercial package delivery operations by Amazon Prime Air (“Prime Air”) from the four Prime Air Drone Delivery Centers (“PADDC”) in Detroit, Michigan. FAA’s approval of Prime Air’s UAS operations supports the federal government’s ongoing efforts to implement its congressional mandate to fully integrate UAS into the National Airspace System (“NAS”). FAA approval of Prime Air’s proposed operations will help normalize safe, scalable, economically viable, and environmentally advantageous commercial UAS package delivery operations in the United States.*

*The CDA supports the FAA’s efforts to approve the amendment of Prime Air’s air carrier Operations Specifications (“OpSpecs”) to allow expanded operations from the four PADDCs that would be co-located on property with existing Amazon warehouses and office facilities. Existing commercial drone deployments like those conducted by Amazon have already demonstrated a net positive impact on the environment—including reductions in overall noise levels and CO2 greenhouse gas emissions. For example, a December 2025 report*

<sup>1</sup> *The CDA is the leading U.S. non-profit organization focused on integration of commercial drones into the national airspace system (NAS). The CDA consists of key leaders in the commercial drone industry. The CDA actively participates in regulatory and policy efforts to facilitate the safe and secure development and expansion of domestic commercial drone operations. The CDA collaborates with all levels of government on policies for industry growth and educates on the safe and responsible use of commercial drones to achieve economic benefits and humanitarian gains. We bring together commercial drone end-users, manufacturers, service providers, drone security companies, and vertical markets including oil and gas, precision agriculture, construction, security, communications technology, infrastructure, newsgathering, filmmaking, package delivery and logistics, and more. Learn more at <https://www.commercialdronealliance.org/>.*

*commissioned by the Small UAV Coalition found that drone deliveries can reduce the amount of vehicle miles travelled by 194.4 million, saving 24.8 million hours (\$497M) annually in time from traffic reduction. The report also found that enabling drone package deliveries can reduce 106.4K tons of carbon and abnormal methane emissions (equivalent to removing 46K cars from the road and 4 coal-fired plants).<sup>2</sup>*

*In its Draft EA, the FAA has evaluated potential impacts that may result from the proposed action including: (1) Wildlife biological resources, (2) Department of Transportation Act, Section 4(f), (3) Historical, architectural, archaeological, and cultural resources, (4) Noise and noise-compatible land use, and (5) Visual effects (visual resources and visual character), among others. We agree with the Draft EA findings that Amazon Prime's proposed operations would not have significant impact on these resources.*

*The Draft EA identifies (1) Aviation emissions and air quality, (2) Biological resources (fish and plants), (3) Coastal resources, (4) Farmlands, (5) Hazardous materials, solid waste, and pollution prevention, (6) Land use, (7) Natural resources and energy supply, (8) Socioeconomics and children's environmental health and safety risks, (9) Visual effects (including light emissions), and (13) Water resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers) as environmental impacts categories that would not be affected by the proposed action and which are therefore excluded from detailed analysis in the Draft EA. We agree that Amazon Prime's package delivery operations occurring at the four PADDs in Detroit, Michigan, would not have a reasonably foreseeable impact on the environmental resources in these categories and that these impact categories are properly excluded from the Draft EA. This approach is consistent with FAA's finding in the 23 EAs of new and amended OpSpecs for UAS operations undertaken by the FAA to date, all of which resulted in a Finding of No Significant Impacts ("FONSI").<sup>3</sup>*

*Prime Air continuously demonstrates its commitment to safety and community engagement, which are critical to the success of commercial drone delivery operations. We agree with the FAA's conclusions that Prime Air's proposed operations will not have a significant environmental consequence, particularly for noise analysis and exposure. According to the Draft EA, none of the environmental effects meet the FAA's significance thresholds (where established) or raise significant adverse impacts. CDA encourages the FAA to determine that Prime Air's operations will not significantly affect the quality of the human environment (individually or cumulatively) and issue a Finding of No Significant Impact.*

*By enabling operations such as those proposed by Prime Air, the FAA is taking important steps to support the UAS industry's viability and enable safe, efficient and environmentally friendly commercial UAS operations that will benefit the American public.*

*In addition, we urge the FAA to finalize the Draft Programmatic Environmental Assessment for Drone Package Delivery Operations in the United States. Despite the vast potential safety, environmental and economic benefits of commercial drone delivery operations, onerous environmental review processes for large-scale commercial drone operations have limited the ability for drone delivery providers operating under Title 14 of the Code of Federal Regulations (14 CFR) Part 135 to sufficiently scale their operations. In practice, each time a drone operator like Amazon Prime Air seeks to initiate operations at a new site or expand*

<sup>2</sup> Accenture, “The Impact of BVLOS Drone Integration in the United States,” (December 2025), available at <https://smalluavcoalition.org/wp-content/uploads/2026/02/Small-UAV-Coalition-Economic-Impact-Assessment-Report-12.30.25.pdf>.

<sup>3</sup> See, FAA Draft Programmatic Environmental Assessment for Drone Package Delivery Operations in the United States, 90 Fed. Reg. 57126 (December 9, 2025), available at [https://www.faa.gov/uas/advanced\\_operations/Part\\_135\\_National\\_DRAFT\\_PEA\\_approved\\_508.pdf](https://www.faa.gov/uas/advanced_operations/Part_135_National_DRAFT_PEA_approved_508.pdf)

*operations at an existing site, the FAA has undertaken National Environmental Protection Act (“NEPA”) review, typically in the form of an environmental assessment like this Draft EA. The environmental review process is currently one of the most costly and burdensome aspects of regulatory review required to conduct UAS package delivery operations in the United States, inhibiting domestic progress and technology adoption nationwide. The result is a stifling of innovation and hindered realization of the environmental benefits that drone package delivery operations offer in comparison to other modes of transportation.*

*To overcome these obstacles and unlock the full potential of drone package delivery operations, it is essential to amend the current regulatory structure and related FAA policies in a way that streamlines and expedites the NEPA review process which will have benefits for both industry and those conducting the agency review and will help normalize safe, scalable, and economically viable commercial UAS package delivery operations in the United States.*

*Sincerely,*

*Lisa Ellman  
CEO, CDA*

*Matthew Clark  
Policy Advisor, CDA*

## FAA Response – 03\_CDA

Thank you for your comment. The FAA has noted your general support for the Proposed Action.

## Public Comment – 04\_Felder

*Dear Mr. Gotha and FAA Environmental Team,*

*I am writing to formally object to the current flight corridors used by Amazon Prime Air over Wood Lake in Bloomfield Township, Michigan. As a resident on Lakecrest drive, situated on the lakefront, I have observed frequent low-altitude commercial drone operations that directly interfere with the "protected wetland" status of this watercourse.*

*Specifically, these flights are causing repeated flushing and disturbance of species protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, including nesting Great Blue Herons and Bald Eagles. I am concerned that the Draft Environmental Assessment for the Detroit expansion did not adequately account for the specific "High Quality" wetland functions of Wood Lake as identified in the Niswander Environmental Wetland Inventory.*

*I request that the FAA re-evaluate this specific corridor and mandate a "no-fly" buffer over Wood Lake to remain in compliance with NEPA and federal wildlife protection statutes.*

*John M. Felder, MD, FACS*

## FAA Response – 04\_Felder

Thank you for your comment. Biological resources include plant and animal species and their habitats, including special status species (federally listed or state-listed threatened or endangered species, species proposed for listing, species that are candidates for federal listing, marine mammals, and migratory birds) and environmentally sensitive or critical habitat. The Endangered Species Act (ESA) of 1973 [16 U.S.C. § 1531 et seq.] requires the evaluation of federal actions to determine whether a proposed action is likely to jeopardize any proposed, threatened, or endangered species or proposed or designated critical habitat. Critical habitat includes areas that will contribute to the recovery or survival of a listed species. Federal agencies are responsible for determining if an action may affect listed species or critical habitat, which determines whether formal or informal consultation with the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service (NMFS) is needed. In addition, the Migratory Bird Treaty Act (16 U.S.C. §§ 703-712) protects migratory birds, including their nests, eggs, and parts, from possession, sale, purchase, barter, transport, import, export, and take. The Migratory Bird Treaty Act applies to migratory birds identified in 50 CFR § 10.13 (defined hereafter as “migratory birds”). Prime Air will be responsible for compliance with the Bald and Golden Eagle Protection Act.

According to FAA Order 1050.1G, impacts to biological resources are considered significant when the USFWS or NMFS determines that a proposed action would be likely to jeopardize the continued existence of a federally listed threatened or endangered species or would be likely to result in the destruction or adverse modification of federally designated critical habitat. Through consultation with USFWS, it was determined that the Proposed Action would not adversely affect and threatened or endangered species of their critical habitat. An action need not involve a threat of extinction to federally listed species to meet the NEPA standard of significance. Lesser impacts, including impacts on non-listed or special status species, could also constitute a significant impact. Therefore, it is important to consider the area of potential impact. The Proposed Action would take place over high to medium density developed urban and commercial landscapes, with rural areas scattered throughout the study area. Therefore, wildlife habitats within the study area predominantly include parks, a few open spaces, waterways, and vacant lands.

During the review process, state and federal databases were accessed, including the Michigan Natural Features Inventory which lists species of fish, plants and wildlife that are protected under Part 365, Endangered Species Protection, of the Natural Resources and Environmental Protection Act, Act 451 of 1994. In addition to this list, data was also received using the USFWS IPaC system for potential species listed as endangered, threatened, or species of concern, including potential migratory birds and USFWS’s Birds of Conservation Concern that may occur within the study area. **Appendix B** of the draft EA provides a list of federal and state-listed species for each county within the action areas.

Prime Air understands the importance of reporting collisions between aircraft and wildlife and will report any wildlife strikes via FAA Form 5200-7: Bird and Other Wildlife Strike Report. From this list, species that have the greatest potential to be impacted by the Proposed Action were identified understanding that

Prime Air's aircraft would not touch the ground in any other place than the PADDs (except during emergency landings) since they remain airborne while conducting deliveries. The operations would be taking place within airspace, and typically well above the tree line and away from sensitive habitats. After launch, Prime Air's drone would rise to a cruising altitude between 180 feet and 377 feet AGL and follow a preplanned route to its delivery site. The pre-planned route is optimized to avoid terrain and object obstructions, areas of high aircraft traffic, and areas where people may gather in large numbers such as highways, parks, and schools.

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

It is not likely that listed species would be in the vicinity of the delivery location because such locations would be developed areas. However, even if species were expected to be exposed to this noise level, the noise would be unlikely to cause significant disturbance (for context, a drone overflight at 50 feet is approximately 74.2 decibels, whereas a leaf blower at 50 feet is approximately 73 to 77 decibels)<sup>2</sup>. At a potential maximum of 1,000 flights per day across the entire action area of each PADD (or 4,000 total per day), the distribution and altitude of the flights are not expected to significantly affect wildlife in the action area.

The FAA initiated Section 7 consultation with the USFWS Michigan Ecological Services Field Office on May 8, 2025. On July 10, 2025, the Michigan Ecological Services Field Office issued a written concurrence that the Proposed Action is unlikely to adversely affect wildlife in Michigan.

## Public Comment – 05\_SUC

*Please confirm receipt. Thank you.*

*Gregory S. Walden  
Counsel  
Small UAV Coalition  
[gregorywalden@smalluavcoalition.org](mailto:gregorywalden@smalluavcoalition.org)  
202-403-9904*

<sup>2</sup> Appendix E: Noise Assessment Amazon Prime Air MK27-2 Unmanned Aircraft Operations at College Station Texas, Table 10 and Characteristics of Lawn and Garden Equipment Sound: A Community Pilot Study (National Institutes of Health) (National), December 2017, Available <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6707732/>, Table 2

*(Transcript of email attachment follows)*

***Small UAV Coalition comments***  
***Federal Aviation Administration Draft Environmental Assessment***  
***Amazon Prime Air Delivery Operations in Detroit, Michigan***  
***January 2026***  
***Filed in 9-FAA-Drone-Environmental@faa.gov***

*The Small UAV Coalition (“Coalition”) is pleased to submit these comments in support of the FAA’s above-captioned draft Environmental Assessment (“EA”) and recommends the FAA issue a Finding of No Significant Impact (“FONSI”) promptly after consideration of the public comments.*

*The Coalition commends the FAA for proposing a programmatic environmental assessment for nationwide package delivery. While that proceeding is in process, the Coalition also commends the FAA for continuing to conduct environmental assessments for individual operators in discrete locations.*

*Commercial delivery by drone has resulted in quick and safe delivery of a variety of products that benefit both businesses and the public. Amazon Prime Air’s delivery of packages up to 5 pounds using its MK30 electric-powered drone reduces the use of carbon-emitting ground vehicles, whether by a customer driving to a business or a business that delivers goods to a residence. Apart from its environmental benefits, drone operations have the potential to reduce the number of vehicles on the road, thereby improving road safety.*

*Amazon seeks an amendment to its Part 135 Operations Specifications (“Op Specs”) to conduct flight operations from four new Prime Air Drone Delivery Centers (“PADDCs”) in the Detroit metro area to destinations within a 7.5 mile radius. This Op Specs amendment is the Federal action triggering review under the National Environmental Policy Act (“NEPA”). These flights will be distributed among PADDCs, limiting daily flights within each PADDC. The draft EA states that up to 1,000 flights per day will be conducted from 6 a.m. to 10:30 pm, with only 10% of flights will be conducted between 6:00 and 7:00 a.m. and 10:00 to 10:30 p.m., thereby minimizing the risk of any sleep disturbance. Amazon’s proposed routes are optimized to avoid terrain and object obstructions, areas of high aircraft traffic, and areas where people may gather in large numbers, such as highways, parks, and schools.*

*The Coalition agrees with the FAA’s conclusion that ten of the 14 areas of evaluation of environmental impacts do not warrant detailed consideration and expects the FAA will be able to make this same determination with respect to other drone operations unless the particular location or nature of operation has the potential to adversely impact one of those ten areas.*

*The Coalition notes that the PADDCs are located in areas approved for warehousing and distribution uses. While the draft EA does not reference the potential of ambient noise to drown out the noise from drones, industrial and commercial areas are typically expected to generate noise from trucks, facilities, and machinery. Appendix A of Part 150 (land use compatibility) shows that commercial use and manufacturing are compatible at DNL amounts over 65 DNL, suggesting that the location of the PADDCs are not in an environmentally sensitive area.*

*With respect to wildlife resources, the FAA concludes that “drone operations would occur mostly in an urban environment, typically well above the tree line and away from sensitive habitats and given the short duration of increased ambient sound levels, flights are not expected to significantly influence wildlife in the area.”*

*For the noise impacts, the FAA examined noise at three stages: the PADDCC; en route while the drone will operate between 160 and 180 feet Above Ground Level (“AGL”); and at the point of delivery, when the drone descends to about 13 feet AGL. Using its DNL metric, the draft EA concludes that at no point will the noise exceed DNL 65 dB, except within a 150 feet radius from the PADDCC, which is entirely on Amazon Prime Air’s property. During the en route phase of the operation, the noise will at no point exceed DNL 46 dB in any one area. During delivery, the noise is expected to be well below the DNL 65 dB. In fact, the FAA has determined that residential noise during delivery will not exceed DNL 50.1 dB.*

*For historic properties, the Coalition agrees that “Prime Air’s drone operations would have limited non-physical, reversible impacts on historic properties such as the introduction of audible and/or visual elements.”*

*With respect to visual impacts, the Coalition agrees that a drone that is seen only up to 3.6 seconds at any point is not likely to have any significant visual impact.*

*With respect to Section 4(f) resources, the Coalition agrees with the FAA’s conclusion that the proposed flights will not constitute a physical or a constructive use of any section 4(f) resource and will not cause any substantial impact, relying on the noise, visual impacts and historic property analyses in the draft EA.*

*In sum, the Coalition agrees with the findings in the draft EA and urges the FAA to promptly issue a FONSI after it considers comments from the public.*

*Respectfully submitted,*

*Gregory S. Walden  
Counsel  
Small UAV Coalition  
gregorywalden@smalluavcoalition.org  
202-403-9904  
February 17, 2026*

## **FAA Response – 05\_SUC**

Thank you for your comment. The FAA has noted your general support for the Proposed Action.

## **Public Comment – 06\_WFD**

*To Whom It May Concern,*

*As the Drone Team Coordinator for the Warren Fire Department, I submit the following comments regarding the Draft Environmental Assessment (EA) for Amazon Prime Air package delivery operations in Detroit, Michigan. These comments are offered from the perspective of a municipal fire department responsible for emergency response, life safety, and incident command operations within the City of Warren and surrounding jurisdictions.*

*The Warren Fire Department recognizes the growing role of unmanned aircraft systems (UAS) in commercial and public-sector applications and does not oppose innovation or advancement in aviation technology. However, it is critical that the expansion of commercial drone delivery operations be evaluated in the context of existing and future public safety UAS operations that occur in the same low-altitude airspace.*

### ***Public Safety Airspace Use and Incident Command Considerations***

*Fire department UAS operations are mission-critical assets used during time-sensitive emergencies, including structure fires, hazardous materials incidents, mass casualty incidents, technical rescues, and active assailant events. These operations are conducted under the Incident Command System (ICS), where the Incident Commander is responsible for establishing operational priorities, including airspace management, to ensure responder safety and effective incident mitigation.*

*Unlike commercial delivery operations, public safety UAS missions are dynamic, unpredictable, and often initiated with little or no advance notice. Emergency UAS launch locations, flight profiles, and duration are driven by incident conditions rather than preplanned routes or schedules.*

### ***Low-Altitude Airspace Deconfliction and Priority***

*The Draft EA should more explicitly address how low-altitude airspace will be managed when commercial drone operations and emergency response UAS operations occur simultaneously within the same geographic area. Of particular concern are the following operational issues:*

- *Clear and enforceable priority for public safety UAS operations over commercial drone traffic during emergency incidents*
- *Real-time airspace deconfliction mechanisms that function immediately upon incident declaration, not after manual coordination delays*
- *Rapid suspension or rerouting of commercial drone operations when an Incident Commander establishes an emergency airspace area*
- *Fail-safe procedures in the event of communication or system failures affecting automated or BVLOS commercial operations*

*Absent explicit requirements, there is a risk that automated commercial operations could unintentionally interfere with emergency response activities, creating safety hazards for responders and the public.*

### ***Coordination With Local Emergency Services***

*The Warren Fire Department recommends that the Final EA include explicit requirements for coordination between Amazon Prime Air operations, FAA-approved UAS traffic management systems, and local public safety agencies. This should include:*

- *Defined notification and coordination protocols with local fire and law enforcement agencies*
- *Recognition of ICS authority during emergency incidents involving UAS operations*

- *Integration considerations for public safety Drone as First Responder (DFR) and BVLOS programs*
- *Procedures ensuring immediate compliance with emergency airspace restrictions established at incident scenes*

*Public safety agencies should not be placed in a reactive position when managing airspace during emergencies. Coordination mechanisms must be proactive, reliable, and tested prior to expanded commercial deployment.*

### ***Cumulative Operational Impacts***

*The Warren Fire Department also encourages the FAA to consider cumulative operational impacts associated with increased density of commercial UAS operations in urban environments. While individual flights may appear low risk, sustained and repetitive operations increase the likelihood of conflicts during emergency responses over time. These cumulative effects should be addressed in the Final EA.*

### ***Conclusion***

*The Warren Fire Department respectfully requests that the FAA ensure the Final Environmental Assessment explicitly acknowledges and protects the operational needs of public safety UAS programs. Commercial drone delivery operations must be structured in a manner that preserves the authority of Incident Command, ensures immediate airspace priority for emergency response, and prevents operational interference during critical incidents.*

*We appreciate the opportunity to provide input during the public comment period and stand ready to engage in further discussion to support safe integration of commercial and public safety UAS operations.*

*Respectfully submitted,*

*Jeff Middleton  
Chief Safety Officer  
Warren Fire Department*

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## **FAA Response – 06\_WFD**

Thank you for your comments. The FAA would like to clarify that the primary purpose of a NEPA EA is to evaluate the potential environmental impacts of a proposed action to determine whether it will result in significant impacts on the human environment. However, the NEPA EA process does not address airspace access or coordination over access, which is governed by a separate set of safety and regulatory

requirements. Airspace access is determined based on an operator's ability to meet the necessary safety standards and requirements established by the FAA. These decisions are made through a rigorous process that ensures safe and efficient use of the national airspace system. Thus, while your concern is noted, it falls outside the scope of the NEPA EA process.

## Public Comment – 07\_WPD

*Good afternoon,*

*Attached for your review is the Warren Police Department's public safety operational comment regarding the Draft Environmental Assessment for Amazon Prime Air Operations in Detroit, Michigan.*

*Respectfully,*



*(Transcript of email attachment follows)*

*January 16, 2026*

*Subject: Public Safety Operational Comment on Draft Environmental Assessment – Amazon Prime Air Operations, Detroit, MI*

*To Whom It May Concern,*

*On behalf of the Warren Police Department, I respectfully submit the following comments regarding the Draft Environmental Assessment (EA) for Amazon Prime Air package delivery operations in Detroit, Michigan. These comments are offered from the perspective of a municipal law enforcement agency responsible for public safety, emergency response, and incident command within the City of Warren and surrounding jurisdictions.*

*The Warren Police Department recognizes the continued advancement of unmanned aircraft systems (UAS) technology and acknowledges the value of innovation in both commercial and public-sector aviation. The Department does not oppose the responsible integration of commercial drone delivery operations. However, the expansion of these operations must be evaluated alongside existing and expanding public safety UAS missions that operate in the same low-altitude airspace on both an emergency and routine basis.*

### ***Law Enforcement UAS Operations and Incident Command***

*Law enforcement UAS operations are mission-critical tools used during rapidly evolving and high-risk incidents, including active assailant events, barricaded subjects, missing persons searches, vehicle pursuits, crowd control incidents, disaster response, and officer-safety operations. These missions are conducted under the Incident Command System (ICS), where the Incident Commander maintains authority over all operational components, including airspace management, to ensure responder and public safety.*

*Unlike commercial drone delivery operations, police UAS deployments are inherently unpredictable and time-sensitive. Launch locations, flight paths, altitude, and duration are dictated by real-time threat conditions and investigative needs rather than preplanned routes or schedules. Any delay or interference with law enforcement UAS operations can have direct life-safety consequences.*

### ***Airspace Deconfliction During Routine Law Enforcement Operations***

*In addition to emergency incidents, law enforcement UAS are routinely deployed for proactive and preventative public safety missions, including search operations, special event security, training, crime-scene documentation, and Drone as First Responder (DFR) operations. These activities may occur daily and often without advance notice beyond local agency coordination.*

*The Draft EA should address how routine law enforcement UAS operations will safely coexist with recurring commercial drone delivery flights in shared low-altitude airspace. Of particular concern are:*

- *Predictable and transparent deconfliction mechanisms between commercial delivery routes and routine law enforcement UAS activity*
- *Real-time visibility for law enforcement into active or planned commercial drone operations within their jurisdiction*
- *Procedures to prevent commercial operations from routinely occupying airspace that public safety agencies rely upon for patrol, training, or DFR response*
- *Assurance that routine law enforcement operations are not constrained, delayed, or displaced by sustained commercial flight density*

*Without defined coordination mechanisms, routine commercial operations could gradually erode the operational flexibility law enforcement agencies require to conduct proactive public safety missions.*

### ***Low-Altitude Airspace Priority During Emergency Incidents***

*The Draft EA should more explicitly address how low-altitude airspace will be managed when commercial drone delivery operations and law enforcement UAS operations occur simultaneously during emergency incidents. Of particular concern are the following issues:*

- *Clear and enforceable priority for public safety and law enforcement UAS operations over commercial drone traffic*

- *Immediate, automated airspace deconfliction mechanisms that activate upon incident declaration, without reliance on delayed manual coordination*
- *Rapid suspension or rerouting of commercial drone operations when an Incident Commander establishes an emergency airspace restriction*
- *Robust fail-safe procedures to address communication failures, system degradation, or loss of control affecting automated or BVLOS commercial operations*

*Absent explicit requirements, automated commercial drone operations could unintentionally interfere with law enforcement air operations, creating safety hazards for officers, other responders, and the public.*

### ***Coordination With Local Law Enforcement Agencies***

*The Warren Police Department recommends that the Final EA impose explicit and enforceable requirements on commercial UAS operators—specifically Amazon Prime Air—to proactively manage airspace deconfliction and coordination with local law enforcement agencies. Responsibility for ensuring safe integration with public safety UAS operations must rest with the commercial provider and not be shifted to emergency response agencies operating under time-sensitive and mission-critical conditions.*

*At a minimum, commercial operators should be required to:*

- *Establish and maintain defined notification and coordination protocols with local police departments and emergency communications centers*
- *Formally recognize Incident Command authority during emergency incidents involving UAS operations*
- *Design commercial operations to account for existing and future public safety Drone as First Responder (DFR) and BVLOS law enforcement programs*
- *Ensure immediate compliance with emergency airspace restrictions established by on-scene commanders, including rapid suspension or rerouting of commercial operations*
- *Maintain ongoing, proactive coordination mechanisms for routine operations, not limited solely to emergency response*

*In addition, the Warren Police Department recommends that commercial UAS providers be required to furnish local public safety agencies with advance operating parameters for their aircraft and operations. This should include, but not be limited to, a 24-hour point of contact for real-time notifications and coordination, typical operating altitudes, flight profiles, performance characteristics, detect-and-avoid capabilities, contingency procedures, and limitations relevant to shared low-altitude airspace. Access to this information is essential for effective pre-incident planning, training, and real-time operational decision-making.*

*Law enforcement agencies should not be placed in a reactive posture when managing airspace conflicts created by commercial operations. Coordination and deconfliction mechanisms must be commercial-*

*operator driven, proactive, reliable, and operationally validated prior to the approval and expansion of commercial drone delivery operations.*

### ***Cumulative Operational and Public Safety Impacts***

*The Warren Police Department also encourages the FAA to consider cumulative operational impacts associated with increased density of commercial UAS operations in urban environments. While individual commercial flights may present minimal risk in isolation, sustained and repetitive operations increase the likelihood of conflicts during both routine law enforcement activity and emergency response over time. These cumulative effects should be meaningfully addressed in the Final EA.*

### ***Conclusion***

*The Warren Police Department respectfully requests that the FAA ensure the Final Environmental Assessment explicitly acknowledges and protects the operational requirements of law enforcement UAS programs. Commercial drone delivery operations must be structured in a manner that preserves Incident Command authority, ensures immediate airspace priority during emergencies, supports effective deconfliction during routine operations, and prevents operational interference with critical public safety missions.*

*We appreciate the opportunity to provide input during the public comment period and remain available to support continued coordination to ensure the safe integration of commercial and public safety UAS operations.*

*Respectfully submitted,*

*Eric Hawkins  
Commissioner of Police  
Warren Police Department*

## **FAA Response – 07\_WPD**

Thank you for your comments. The FAA would like to clarify that the primary purpose of a NEPA EA is to evaluate the potential environmental impacts of a proposed action to determine whether it will result in significant impacts on the human environment. However, the NEPA EA process does not address airspace access or coordination over access, which is governed by a separate set of safety and regulatory requirements. Airspace access is determined based on an operator's ability to meet the necessary safety standards and requirements established by the FAA. These decisions are made through a rigorous process that ensures safe and efficient use of the national airspace system. Thus, while your concern is noted, it falls outside the scope of the NEPA EA process.