Appendix F
Public Comments

PUBLIC COMMENTS RECEIVED ON THE DRAFT EA AND FAA RESPONSES

Introduction

This appendix includes a summary of public comments received on the FAA's March 2026 Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Florida (Draft EA). The Notice of Availability (NOA) announcing the public availability of the Draft EA was published on the FAA's website on March 10, 2026, which included a public review and comment period through April 8, 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 using 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.

The FAA developed Topic Specific Responses to cover topics that were raised in multiple comment submissions (e.g., drone noise, privacy, etc.). The Topic Specific Responses also contain background information on the general context of the EA to assist the public in better understanding the FAA's responses to comments. Specific responses were developed based on the nature of comments received or additional questions that were raised within each topic. A response was provided to each of the comment letters. A Topic Specific Response number(s) might also be provided and referenced for a response to the comment and/or question. If a comment letter contained a comment or question that was not covered under these general responses, an individual response was provided.

Note: While each topic identified by a commenter is assigned a letter for purposes of clearly matching comments and responses, it is not uncommon for a specific topic to appear more than once in a single comment submission (e.g., comment extension, comment restatement, etc.); as such, the comment-response lettering may, at times, appear out of alphabetical order.

Topic Specific Responses

1. Noise Exposure

Section 3.6 and the Technical Noise Report found in **Appendix E** of the 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.

For PADCC operations, the EA evaluated the anticipated average daily maximum of 1,000 deliveries provided by Prime Air for each PADDC, 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 PADDC operations is shown in **Figures E-1 through E-6 in Appendix E-2** and presented in **Table 3-4** in the EA.

For en route operations, the 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. As detailed in the EA, en route noise levels could reach DNL 46.0 dB in any location within the Study Areas.

For delivery operations, the 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. The noise exposure for any one delivery point (with en route noise as mentioned above) is presented in **Table 3-5** of the 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 PADDC site where noise levels at or above DNL 50 dB would extend approximately 1,050 ft from each PADDC. Noise levels at or above DNL 65 dB would extend approximately 150 ft from the PADDC. Additionally, the estimated noise exposure for en route operations could reach up to DNL 46 dB at any location within the action area. Lastly, the resulting noise exposure at any residential-zoned property line would not be expected to exceed DNL 48.1 dB. As noted in the 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 EA.

2. Noise Metrics

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 (1) has been shown to correlate well with human response to noise, (2) has been widely used for describing transportation and community noise exposure, and (3) 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.[1] 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 unmanned aircraft (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. 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.

3. Privacy

The FAA's mission is to provide the safest, most efficient airspace system in the world, but that does not include regulating privacy. Although the FAA is not authorized to impose regulations based on privacy concerns, it intends to continue collaborating with stakeholders, including the public and other agencies with authority and expertise in privacy law and policy. The FAA's lack of jurisdiction over privacy, however, does not relieve Prime Air from complying with other laws and regulations, including those related to privacy, that may be applicable to Prime Air's operations in Florida.

The MK30 drone does not capture imagery from underneath while in forward flight and the camera array is only used to ensure safe flight. During the delivery phase, the drone descends to the customer's property and hovers, using camera and sensor technology to ensure the delivery area is clear of obstacles and the delivery can be made safely. The cameras and sensors on the drones are operational to see what's around them to aid in flight navigation and safety. The operator does not see the feed from the cameras.

[1] 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.

They are not built or operated to be surveillance drones. They store only critical mission data to improve systems and flight planning.

4. Safety

49 U.S.C. § 44807 provides the Secretary of Transportation (the Secretary) with authority to determine whether a certificate of waiver, certificate of authorization, or a certificate under § 44703 or § 44704, is required for the operation of certain UAS. Section 44807(b) instructs the Secretary to base their determination on which types of UAS do not create a hazard to users of the National Airspace System (NAS) or the public. In making this determination, the Secretary must consider the size, weight, speed, and operational capability of the UAS, as well as other aspects of the proposed operation. The Secretary delegated this authority to the Administrator on October 1, 2021. In accordance with the statutory criteria provided in 49 U.S.C. § 44807, and in consideration of the size, weight, speed, and operational capability, proximity to airports and populated areas, and specific operations, the FAA determined that Prime Air's drones and operations do not create a hazard to users of the NAS or the public. As with all operations authorized to be conducted under a § 44807 exemption, the FAA set appropriate conditions and limitations to minimize risk and maintain an equivalent level of safety to that provided and intended by the rules that would otherwise apply to the operation.

The current exemption, Exemption No. 18601E, was issued August 7, 2025[2]. The FAA's safety determinations regarding the regulatory relief necessary to enable these operations are available at Regulatory Docket No. FAA-2019-0573.

The FAA Hotline accepts reports related to the safety of the National Airspace System, violations of Federal Aviation Regulations, aviation safety issues, and reports related to FAA employees or FAA facilities[3]. The FAA Hotline provides a single venue for FAA employees, the aviation community, and the public to file their reports.

5. Quality of Life

"Quality of life" is not an environmental resource category that is referenced in NEPA or FAA Order 1050.1G. The concept of quality of life is associated with certain environmental resource categories addressed in NEPA documents, including noise and socioeconomics.

The Proposed Action is not expected to result in significant impacts to any of the environmental resource categories, including noise and socioeconomics. In accordance with the requirements of NEPA, the purpose of the EA is to assess and disclose the environmental impacts of the Proposed Action and make a determination as to the significance of the impact(s). While some of the environmental resource categories could have project-related environmental effects (e.g., noise), these effects would not be significant. **Chapter 3** of the EA discusses the effects of the Proposed Action on each environmental resource category, including noise and socioeconomic impacts, which are most frequently associated with quality of life effects.

[2] https://www.regulations.gov/document/FAA-2019-0573-0087

[3] https://www.faa.gov/about/office_org/headquarters_offices/aae/programs_services/faa_hotlines

6. NEPA Process

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 environmentally unrelated concerns will be noted, they fall outside the analytical scope of the NEPA EA process.

Public Comments and FAA Responses

Public Comment No.	Commenter Name
01_Konopka	Adam Konopka
02_CoT	City of Tamarac (CoT)
03_OCG	Orange County Government (OCG)
04_OCG	Orange County Government (OCG)
05_IAAPA	International Association of Amusement Parks and Attractions (IAAPA)
06_MBLLBV	Municipalities of Bay Lake and Lake Buena Vista (MBLLBV)

Public Comment – 01_Konopka

Dear FAA,

As an Apollo Beach, FL resident directly impacted by proposed Amazon Prime Air drone operations, I submit these comments on the Prime Air Florida Draft Environmental Assessment.

As a resident of Apollo Beach, FL 33572, I strongly oppose expanding beyond-visual-line-of-sight (BVLOS) operations for commercial delivery drones without stronger protections for noise, privacy, and low-altitude airspace over homes.

Key concerns:

[A] *Noise Disturbance: Frequent drone overflights at rooftop level (400 ft or below) create intrusive buzzing that disrupts peace, sleep, and quality of life—* **[B]** *far more annoying than traditional aircraft due to tone and repetition.*

[C] *Privacy Invasion: Drones hovering or routing directly over private property enable unauthorized surveillance of backyards, windows, and daily activities.*

[D] *Safety and Property Rights: Low flights risk crashes onto homes/schools; current rules ignore "trespass" at immediate low altitudes, eroding homeowner control.*

Amazon Prime Air and similar services are already testing in neighborhoods, with residents in Texas reporting constant intrusions. Florida's Riverview/Tampa Bay area faces the same as expansion grows. At our home, we are subject to them near-daily to multiple times per day.

Recommendations:

Mandate drone-specific noise standards with "noise budgets" capping flights over residential zones by time/day.

Require 500+ ft minimum altitude over homes (or property owner consent) and Remote ID transparency.

Enhance local input via NEPA reviews and zoning for launch/landing sites.

This is unsustainable without reform—prioritize communities over unchecked commerce.

The proposed operations would create unsustainable noise, privacy invasions, and safety risks over residential neighborhoods. Require the mitigations above before approval.

Thank you,
Adam Konopka
7513 Lantern Park Ave
Apollo Beach, FL 33572

FAA Response – 01_Konopka

Thank you for your comments.

[A] Please refer to *Topic Specific Response 5: Quality of Life*

[B] Please refer to *Topic Specific Response 1: Noise Exposure* and *Topic Specific Response 2: Noise Metrics*.

[C] Please refer to *Topic Specific Response 4: Privacy*.

[D] Please refer to *Topic Specific Response 3: Safety*.

Public Comment – 02_CoT

Hello FAA, Environmental Review Administrator

Thank you for the opportunity to provide comments for the Environmental Assessment prepared for Amazon Prime Drone Delivery public review period. Below are our comments for your consideration. Should you have any questions, feel free to reach myself, Maher, or Ann.

These comments and questions are intended to better understand the potential long-term impacts on residential neighborhoods, environmental resources, and municipal infrastructure within the City of Tamarac.

[A] ***1. Cumulative Noise Impacts in Residential Areas***

The EA discusses drone noise levels; however, the City encourages further analysis of cumulative noise impacts associated with frequent, repetitive, low-altitude flights over residential neighborhoods. High-frequency drone noise may be perceived differently than traditional aircraft noise and **[B]***could result in quality-of-life concerns, particularly during early morning and evening hours. Additional modeling of clustered flight paths along repeated delivery routes would be beneficial.*

[C] ***2. Privacy Considerations***

Residents may have concerns regarding onboard navigation cameras and sensors that could capture incidental images of private property or residential activities. The City recommends increased transparency regarding data collection, storage, and privacy protections related to drone operations in residential areas.

[D] ***3. Wildlife and Ecological Impacts***

Low-altitude drone operations may disturb wildlife, including migratory birds, nesting species, and urban pollinators. The City recommends further evaluation of potential interactions between drone flight corridors and local wildlife habitats, particularly near conservation areas, urban tree canopies, and water bodies.

[E] ***4. Visual and Community Character Impacts***

While the EA primarily focuses on measurable environmental metrics, increased drone traffic over residential areas may affect community character and perceived quality of life. The City recommends that visual impacts and community perception be included in the evaluation.

[F] ***5. Safety and Risk Considerations***

Although operational safety systems are described in the EA, residents may still have concerns regarding potential drone malfunctions, crashes, or falling packages. Additional information regarding operational redundancies, incident response protocols, and liability coverage would help address these concerns.

[G] ***6. Local Infrastructure and Operational Impacts***

Drone delivery operations may require staging areas, charging infrastructure, and distribution hubs that could generate additional vehicle traffic or operational activity near existing facilities. The City recommends further evaluation of potential ground-level impacts on surrounding neighborhoods and infrastructure.

[H] ***7. Environmental Justice Considerations***

The City encourages the FAA to evaluate whether drone delivery flight patterns could result in disproportionate impacts on certain neighborhoods, particularly with respect to noise exposure and frequency of overflights.

[I] ***8. Property Value and Market Perception***

While property value impacts are not typically quantified in environmental assessments, persistent drone activity over residential areas may influence public perception and real estate market dynamics. This issue may warrant further consideration in community impact discussions.

[J] ***9. Local Land Use Compatibility***

Municipal governments are responsible for local land use planning, zoning, and nuisance regulations. The City encourages continued coordination with local jurisdictions to ensure compatibility between drone operations and residential areas, parks, schools, and other sensitive uses.

[K] ***10. Emergency Operations Coordination***

The City recommends that the FAA evaluate coordination protocols between drone delivery operations and emergency aviation activities, including medical helicopters, law enforcement aviation units, and disaster response operations.

The City of Tamarac supports the responsible integration of emerging technologies into the national airspace system; however, it is important that these technologies be implemented in a manner that protects residential quality of life, environmental resources, and municipal operations.

Additional Inquiries

[L] *1. The document identifies 6901 Hiatus Road in Tamarac as a potential site for a ground control station, aircraft maintenance area, battery storage area, and paved departure/arrival pads. If drone delivery service is not implemented within Tamarac, will flight paths still route drones through the City's airspace to serve nearby municipalities such as Coral Springs? If so, what level of drone traffic should be anticipated?*

[M] *2. Has a study been conducted to estimate the average number of vehicle miles reduced as a result of drone delivery operations? If so, please provide information on projected carbon emission reductions, traffic impacts, and the overall carbon footprint.*

[N] *3. What is the projected timeline for implementing drone delivery services across municipalities in South Florida?*

[O] *4. Will drone operations continue during adverse weather conditions, including extreme heat, heavy rainfall, high winds, hurricanes, or lightning storms? Please describe operational thresholds and conditions under which service would be suspended.*

[P] *5. Will drones be illuminated during nighttime operations, and if so, what type of lighting will be used?*

[Q] *6. What is the anticipated impact of drone charging infrastructure on the power grid and adjacent properties? Has an electrical load analysis been conducted?*

[D] *7. Has the FAA conducted studies or provided guidance on mitigating potential conflicts between drones and wildlife, including birds, bats, and migratory species?*

[R] *8. Has an analysis been conducted regarding potential conflicts between drone flight paths and the ascending or descending paths of commercial aircraft, private aircraft, or emerging eVTOL vehicles?*

9. Has any assessment been conducted regarding aerial risks posed by fireworks, kites, and other recreational aerial activities commonly occurring in residential areas, particularly during holidays or special events?

[S] *10. Beyond municipal officials, have the FAA or Amazon identified additional stakeholders in Tamarac who may be impacted by the proposed operations? If so, please provide a list of stakeholders contacted as part of the public outreach process referenced in the March 10, 2026 notice.*

[A] *11. Has a decibel-level analysis been conducted to evaluate noise impacts near operational hubs, where drone activity may be more concentrated? Please provide any available data.*

[T] *12. How will liability be addressed in the event of drone crashes, failures, or malfunctions that result in injury or property damage?*

[K] *13. What emergency protocols will be provided to local first responders and law enforcement for incident management involving drone-related accidents or failures?*

[C] *14. How does Amazon plan to address privacy concerns related to potential surveillance of residential areas and sensitive government infrastructure?*

[C] *15. Has the FAA conducted, or does it plan to conduct, additional assessments related to privacy, safety, and property rights concerns associated with drone delivery operations in Florida?*

[U] *16. While the Draft EA evaluates several environmental impact categories under NEPA, it is unclear whether a separate review has been conducted regarding routine low-altitude drone flights over private property. Has the FAA evaluated, or does it plan to evaluate, aerial trespass considerations and broader property rights implications associated with repeated drone operations?*

[F] *17. The proposal contemplates frequent drone flights within a 7.5-mile radius of each delivery center, with up to 1,000 deliveries per day per location. Will additional information be provided to municipalities regarding safety and non-environmental considerations addressed within the FAA's regulatory framework?*

We appreciate the opportunity to provide comments on the Draft Environmental Assessment and respectfully request that the FAA consider these comments and inquiries as part of the ongoing review process. The City welcomes continued coordination as this project advances.

Please feel free to contact our office if additional clarification or coordination is needed.

Thank you,

Kent Walia, AICP
Director | Community Development Department
(954) 597-3425 | www.tamarac.org
7525 NW 88th Ave, Tamarac, FL 33321

FAA Response – 02_CoT

Thank you for your comments.

[A] The noise impacts from the simultaneous operations of multiple drones, including over clustered flight paths, 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 information on the noise analysis and calculation of DNL, please refer to *Topic Specific Response 1: Noise Exposure* and *Topic Specific Response 2: Noise Metrics*, in addition to **Section 3.6** of the EA.

[B] Please refer to *Topic Specific Response 5: Quality of Life.*

[C] Please refer to *Topic Specific Response 3: Privacy*.

[D] 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 any threatened or endangered species or 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 Florida Natural Areas Inventory (FNAI) database which lists species of fish, plants, and wildlife that are protected in accordance with the Florida Endangered and Threatened Species Act, Section 379.2291. 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 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 PADDCs (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 PADDC. 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)[4]. At a potential maximum of 1,000 flights per day across the entire action area of each PADDC (or 6,000 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 on July 20, 2025, for the species listed in Table 3-2 of the Draft EA. On April 23, 2026, the USFWS Florida Ecological Services Field Office concurred with the FAA's determination that the Proposed Action is "*not likely to adversely affect any federally listed species or designated critical habitat protected by the Endangered Species Act of 1973…*"

[E] Visual effects were analyzed in the EA, and it is estimated that at typical operating altitude and speeds the drone would be observable for approximately 3.6 seconds by an observer on the ground. Any visual effects are expected to be similar to existing air traffic in the vicinity of the operating areas and therefore, the Proposed Action would not result in significant visual impacts. For additional information please refer to **Section 3.7** of the EA and *Topic Specific Response 5: Quality of Life.*

[F] Please refer to *Topic Specific Response 4: Safety*.

[G] The Proposed Action would not result in any further construction of facilities that would be associated with road traffic or infrastructure. Furthermore, the MK30 drone would be used to replace existing automobile/truck trips to deliver small goods and would not induce increased demand that would contribute to increased truck or roadway traffic. Thus, the Proposed Action is not expected to increase road traffic at PADCC locations or surrounding areas.

[H] On January 20, 2025, President Trump issued Executive Order (E.O.) No. 14148, Initial Rescissions of Harmful Executive Orders and Actions, which revoked E.O. 14096, Revitalizing Our Nation's

[4] 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.

Commitment to Environmental Justice for All (April 21, 2023). On January 21, 2025, President Trump issued Executive Order (E.O.) No. 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity, which revoked E.O. 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (Feb. 11, 1994). With the issuance of E.O. 14148 and E.O. 14173, and the implementation of these Executive Orders by the Department of Transportation, this EA does not analyze environmental effects related to environmental justice.

[I] The proposed action would not involve acquisition of real estate, relocation of residents or community businesses, disruption of local traffic patterns, loss in community tax base, or changes to the fabric of the community.

Furthermore, A limited number of studies have attempted to generally measure the impact of aviation related noise on property values, but specific studies of the impact of aviation noise on real property values have not been conducted and are not required.[5][6][7][8][9] Some studies conducted at national airports, to date, have concluded that aviation noise has only a slight impact on property values with in the DNL 65 dB or greater contours around airports. The aviation noise from drone overflights and delivery locations in the Proposed Action is well below the DNL 65dB threshold of significance; even in the vicinity of the PADDC, the Proposed Action is not expected to exceed the threshold at the nearest noise sensitive location.

A 2008 report by the Airport Cooperative Research Program (ACRP) Synthesis 9: Effects of Aircraft Noise: Research Update on Selected Topics concluded the studies of the effects of aviation noise on property values are highly complex owing to the differences in methodologies, airport/community environments, market conditions, and demand variables involved. Other studies have concluded that aviation noise effects on property value range from some negative impacts to significant negative impacts, while other studies combined airport noise and proximity and concluded that the net effect on property value was positive.

The FAA recognizes that there is on-going interest in measuring the potential impact of aviation related noise on property values and is conducting on-going research in this area through ASCENT, the Aviation Sustainability Center. This research involves work through ASCENT with the Massachusetts Institute of Technology to quantify the capitalized impact of aircraft noise exposure for a sample of US airports on transaction values for residential properties and changes in business activity. For more information, please see: https://ascent.aero/project/aircraft-noise-exposure-and-market-outcomes-in-the-us/

[J] In parallel with the public comment and review period for the draft EA and after conclusion of the NEPA process, it is important for Prime Air and local governments to continue to engage the local community for concerns related to drone operations. Drone package delivery operations require local approvals in addition to the FAA's airspace authorization. The siting of Prime Air's PADCCs and

5 Effects of Aircraft Noise: Research Update on Selected Topics, A Synthesis of Airport Practice, Transportation Research Board, Airport Cooperative Research Program (ACRP), Washington, DC, 2008.

6 Booz-Allen & Hamilton, Inc. Effect of Airport Noise on Housing Values: A Summary Report. 1994. (Prepared for the Federal Aviation Administration, Office of Environment and Energy.)

7 Aviation Noise Effects, Federal Aviation Administration (FAA), Washington, DC, March 1985.

8 Meta-Analysis of Airport Noise and Hedonic Property Values: Problems and Prospects, Jon P. Nelson, 2004.

9 Aviation Noise Effects, Federal Aviation Administration (FAA), Washington, DC, March 1985

associated drone delivery infrastructure are subject to applicable state and local land use and zoning requirements. As such, the FAA does not select the locations for Prime Air to conduct operations, and Prime Air is responsible for complying with any such applicable laws relevant to commencing and continuing their operations and includes any state or local requirements for conducting public outreach or meeting specific reporting requirements. As such, the FAA encourages state and local governments, and the public, to engage with Prime Air directly for any concerns or requests related to Prime Air's drone operations. Requests or concerns may be relayed to Prime Air via email at amazondronefeedback@amazon.com or by calling 888-283-0587.

[K] Please refer to *Topic Specific Response 4: Safety*. Prime Air proactively coordinates with law enforcement and emergency management agencies as needed to protect for event-based airspace restrictions. Likewise, Prime Air submits a Flight Operations Performance Report to the FAA on a monthly basis and proactively reports any safety incidents to the FAA. Prime Air works with the FAA to resolve safety related concerns or violations.

[L] If drone delivery service is not established through this EA process for the SFL3 PADDC, Prime Air would need to reinitiate the NEPA process for the SFL3 or any other future proposed sites, should they decide to introduce drone delivery service at a later date.

[M] While a reduction in emissions is anticipated, a specific study analyzing the number of vehicle miles reduced from the implementation of the Proposed Action has not be conducted and is not required under the NEPA process.

[N] Establishing precise site selection and operational timelines is difficult due to the fluid nature of local regulatory processes. However, Prime Air's robust community outreach will occur well prior to the initiation of operations at these sites.

[O] For additional information please refer to *Topic Specific Response 4: Safety*.

[P] The MK30 drone is only equipped with the lighting required by the FAA, which includes day/night left and right position lights and an anti-collision light that is visible for at least 3 statute miles. The MK30 drone is not equipped with concentrated-beam type lights such as landing lights.

[Q] Electricity consumed for battery charging at the PADDC would be minimal. Electrical loads from the Proposed Action would come from the existing power grid are not anticipated to place a strain on existing grid infrastructure.

[R] In accordance with the statutory criteria provided in 49 U.S.C. § 44807, and in consideration of the size, weight, speed, and operational capability, proximity to airports and populated areas, and specific operations, the FAA determined that Prime Air's drones and operations do not create a hazard to users of the NAS or the public. As with all operations authorized to be conducted under a § 44807 exemption, the FAA set appropriate conditions and limitations to minimize risk and maintain an equivalent level of safety to that provided and intended by the rules that would otherwise apply to the operation. For additional information please refer to *Topic Specific Response 4: Safety*.

[S] The FAA provided a Notice of Availability (NOA) of the Draft EA on March 10, 2026, to local interest groups, local government officials, public park authorities, the State Historic Preservation Office (SHPO), Federally Recognized Indian Tribes, and Tribal Historic Preservation Offices (THPOs). A complete NOA distribution list and documentation of Prime Air's overall public outreach efforts can be found in **Appendix A-2.**

[T] The FAA's primary mission is the safety and efficiency of the National Airspace System, and the safety and reliability of the proposed drone operations have been carefully assessed. The FAA has determined that Prime Air's drones and operation does not create a hazard to users of the NAS or the public and can be conducted safely. For specific information on the FAA's role in assessing drone safety, please refer to *Topic Specific Response 4: Safety*.

[U] 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. Those locations are selected by the operators. Land use and zoning are typically governed by state and local laws. Operators are responsible for complying with any such applicable laws relevant to establishing their operations. Operators are expected to site their distribution hubs in accordance with all local land use ordinances and zoning requirements.

Public Comment – 03_OCG

Good afternoon:

Please accept the attached comments from Orange County Government regarding the Draft EA for Amazon Prime Air.

The County hopes they are a resource for the FAA and for the applicant. Our staff is happy to answer any questions or provide additional information.

Thank you for your consideration.

Alissa Barber Torres, PhD, FAICP, CLTD
Chief Innovation & Emerging Technology Officer
Orange County Mayor's Office
201 S. Rosalind Avenue, Orlando, FL 32801-1393
407-836-5493 | c: 407-405-6004
alissa.torres@ocfl.net
ocfl.net | Innovation

PLEASE NOTE: Florida has a very broad public records law (F. S. 119). All e-mails to and from County Officials are kept as a public record. Your e-mail communications, including your e-mail address may be disclosed to the public and media at any time.

(Transcript of email attachment follows)

Orange County Government (Florida) Comments to the Federal Aviation Administration on Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Florida

April 1, 2026

Chapter 3 – Affected Environment and Environmental Consequences

Proposed facility SFL1 (7469 Kingspointe Parkway, # 300, Orlando, Florida) is in the City of Orlando but its impacts will be seen in the Tangelo Park community, a Census Designated Place in unincorporated Orange County that is only 650 feet from the proposed facility.

Tangelo Park has over 2,400 residents, over 70 percent of whom are Black or African American (2024 5-Year American Community Survey).

As noted in Sec. 3.7.2, public parks and other Section 4(f) properties are valued for their aesthetic attributes. One of the numerous Orange County recreation facilities listed as a Sec. 4(f) resource, Tangelo Community Park has a new community center opening soon at 5160 Pueblo St., Orlando, FL 32819, to serve the Tangelo Park community.

Prime Air proposes to avoid overflights of large public gatherings with drone activity, but the scope of what constitutes a large gathering is not defined here.

Also, Sec. 3.7.3.2 notes visual observation of a flight would last approximately 3.6 seconds. However, Tangelo Park's proximity to SFL1 may result in it being affected by a significant percentage of its projected 1,900 daytime equivalent delivery operations, as shown by Tangelo Park's inclusion in the noise contours depicted in Fig. E-3.

Orange County urges Amazon Prime Air, based on their stated commitment to work with other operators and the FAA to mitigate potential impacts, to direct flights away from the Tangelo Park community and recreation facilities to the extent feasible to avoid visual and noise impacts.

Local governments are preempted by s. 330.41(3), F.S., from many aspects of drone activity. However, County staff would welcome the chance to coordinate with Amazon Prime Air to support any efforts to address potential noise and compatibility concerns.

FAA Response – 03_OCG

Thank you for your comment. 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.

Although it is possible any location in the Study Areas could experience up to 1,000 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 proposal is to avoid overflights of large open-air gatherings of people under the scope of the Proposed Action, which includes public parks and other public properties that may be covered under Section 4(f), such as the Tangelo Community Park Community Center, and have the function of further dispersing operations as the distance from a PADCC increases.

As detailed in **Section 3.6** and the Technical Noise Report found in **Appendix E** of the EA, the Proposed Action is not expected to generate noise levels that exceed the threshold of significance (DNL 65 dB) at the nearest noise sensitive location or result in a DNL 1.5 dB or greater increase at a noise sensitive area already exposed to aviation noise levels of DNL 65 dB or newly expose a noise sensitive area to DNL 65 dB. For more information on the noise exposure analysis please refer to *Topic Specific Response 1: Noise Exposure*.

Public Comment – 04_OCG

Good afternoon:

Please accept the attached updated comments from Orange County Government regarding the Draft EA for Amazon Prime Air. We apologize for any inconvenience.

The County hopes they are a resource for the FAA and for the applicant. Our staff is happy to answer any questions or provide additional information.

Thank you for your consideration.

Alissa Barber Torres, PhD, FAICP, CLTD
Chief Innovation & Emerging Technology Officer
Orange County Mayor's Office
201 S. Rosalind Avenue, Orlando, FL 32801-1393
407-836-5493 | c: 407-405-6004
alissa.torres@ocfl.net
ocfl.net | Innovation

PLEASE NOTE: Florida has a very broad public records law (F. S. 119). All e-mails to and from County Officials are kept as a public record. Your e-mail communications, including your e-mail address may be disclosed to the public and media at any time.

(Transcript of email attachment follows)

Orange County Government (Florida) Comments to the Federal Aviation Administration on Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Florida

April 3, 2026

Chapter 3 – Affected Environment and Environmental Consequences

Proposed facility SFL1 (7469 Kingspointe Parkway, # 300, Orlando, Florida) is in the City of Orlando but its impacts will be seen in the Tangelo Park community, a Census Designated Place in unincorporated Orange County that is only 650 feet from the proposed facility.

Tangelo Park has over 2,400 residents, over 70 percent of whom are Black or African American (2024 5-Year American Community Survey).

As noted in Sec. 3.7.2, public parks and other Section 4(f) properties are valued for their aesthetic attributes. One of the numerous Orange County recreation facilities listed as a Sec. 4(f) resource, Tangelo Community Park has a new community center opening soon at 5160 Pueblo St., Orlando, FL 32819, to serve the Tangelo Park community.

Prime Air proposes to avoid overflights of large public gatherings with drone activity, but the scope of what constitutes a large gathering is not defined here.

Also, Sec. 3.7.3.2 notes visual observation of a flight would last approximately 3.6 seconds. However, Tangelo Park's proximity to SFL1 may result in it being affected by a significant percentage of its projected 1,900 daytime equivalent delivery operations, as shown by Tangelo Park's inclusion in the noise contours depicted in Fig. E-3.

These small but frequent noise exposures, while under the defined threshold of significance, have the potential to be a nuisance that affects community life in Tangelo Park.

Orange County urges Amazon Prime Air, based on their stated commitment to work with other operators and the FAA to mitigate potential impacts, to direct flights away from the Tangelo Park community and recreation facilities to the extent feasible to avoid visual and noise impacts.

Local governments are preempted by s. 330.41(3), F.S., from many aspects of drone activity. However, County staff would welcome the chance to coordinate with Amazon Prime Air to support any efforts to address potential noise and compatibility concerns.

FAA Response – 04_OCG

Thank you for your comment. 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.

Although it is possible any location in the Study Areas could experience up to 1,000 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 proposal is to avoid overflights of large open-air gatherings of people under the scope of the Proposed Action, which includes public parks and other public properties that may be covered under Section 4(f), such as the Tangelo Community Park Community Center, and have the function of further dispersing operations as the distance from a PADCC increases.

As detailed in **Section 3.6** and the Technical Noise Report found in **Appendix E** of the EA, the Proposed Action is not expected to generate noise levels that exceed the threshold of significance (DNL 65 dB) at the nearest noise sensitive location or result in a DNL 1.5 dB or greater increase at a noise sensitive area already exposed to aviation noise levels of DNL 65 dB or newly expose a noise sensitive area to DNL 65 dB. For more information on the noise exposure analysis please refer to *Topic Specific Response 1: Noise Exposure*.

Public Comment – 05_IAAPA

Federal Aviation Administration -

On behalf of IAAPA, the global association for the attractions industry, I am submitting the attached comments regarding the Federal Aviation Administration's Draft Environmental Assessment (EA) for Amazon Prime Air's proposed drone delivery operations in Florida, issued for public review under the National Environmental Policy Act (NEPA).

Thank you,

Keith Stephenson
Director of Public Affairs, North America
IAAPA Global Headquarters
4155 West Taft Vineland Road, Orlando, FL 32837
Direct: +1 321/319-7616
KStephenson@iaapa.org
www.IAAPA.org

(Transcript of email attachment follows)

April 8, 2026

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

[Letter Sent via Email]

Subject: Comments on the Draft Environmental Assessment for Amazon Prime Air Drone Delivery Operations in Florida

Dear Federal Aviation Administration:

On behalf of IAAPA, the Global Association for the Attractions Industry, I submit the following comments on the Federal Aviation Administration's Draft Environmental Assessment (EA) for Amazon Prime Air's proposed drone delivery operations in Florida, released for public review pursuant to the National Environmental Policy Act (NEPA).

IAAPA represents a broad cross-section of the attractions industry, including theme parks, amusement parks, water parks, resorts, and family entertainment centers. In the United States—particularly in Central Florida—our members operate some of the most highly attended, complex, and safety-sensitive fixed-site amusement parks in the country, welcoming tens of millions of guests annually.

Given the scope and characteristics of the proposed action, IAAPA has a strong interest in ensuring that the integration of commercial drones into the National Airspace System is carried out in a way that fully reflects the unique safety, security, and operational considerations of fixed-site amusement parks.

Position Summary

IAAPA supports the advancement of commercial drone operations in Florida and nationwide. However, any such expansion will have to be consistent with the ultimate implementation of clear, enforceable regulations under 49 U.S.C. § 2209 (Section 2209) that enable fixed-site facilities, including amusement parks, to petition for and receive appropriate airspace protections. While the Administration continues to develop regulations under 49 U.S.C. Section 2209, designed by Congress to enable these important safety protections, we urge you to anticipate the strong likelihood that implementation will result in the designation of certain areas – especially those specifically named in the statute – as locations where operations of certain UAS are prohibited.

Moving ahead with blanket approval of the petitioner's request to operate UAS in the area defined by Amazon - without any limitations regarding areas highly anticipated to be the subject of petitions under Section 2209 - risks introducing large-scale, routine UAS operations into environments that Congress has explicitly recognized as safety-sensitive, without providing the safeguards necessary to mitigate those risks.

At present, no finalized regulatory framework exists to operationalize Section 2209 protections for fixed-site amusement parks, creating a gap between statutory intent and real-world implementation.

1. Need for Implementation of Section 2209 Protections

Pursuant to Section 2209, Congress expressly identified amusement parks as a class of fixed-site facilities eligible to petition for drone-restricted airspace that includes: (1) critical infrastructure, such as energy

production, transmission, distribution facilities and equipment, and railroad facilities; (2) oil refineries and chemical facilities; and (3) state prisons.

This reflects a clear legislative intent to protect locations characterized by dense public gatherings and unique safety considerations.

The draft EA evaluates the environmental impacts of expanded drone delivery operations but does not fully evaluate the implications of limitations that will likely follow from finalized Section 2209 implementation for fixed-site facilities, including amusement parks.

IAAPA respectfully submits that enabling large-scale drone delivery operations—including operations of up to 1,000 flights per day per site across multiple Florida locations—prior to establishing a functional pathway for eligible facilities to obtain airspace protections is inconsistent with both:

• Congressional intent; and • NEPA's requirement to take a "hard look" at reasonably foreseeable impacts, including safety and operational risks to affected environments

2. Unique Risk Profile of Fixed Site Amusement Parks

Fixed-site amusement parks present a unique operational environment that differs materially from typical suburban or commercial delivery areas. First and foremost, these facilities bring together large crowds in open environments. Moreover, safety risks from the operation of certain UAS in these environments are further amplified by additional dynamic conditions there such as:

• Collision hazards with rides, infrastructure, or pyrotechnic operations, and the potential for injury to guests and employees from falling equipment

• Interference with entertainment and live shows; and

• Security threats, including intentional efforts to disrupt outdoor gatherings

These risks are not fully captured by generalized environmental impact categories and warrant specific consideration within the FAA's decision-making framework.

3. Recommendation for Risk-Based, Site-Specific Consideration

IAAPA does not wish to impede commercial drone operations outside of these high-risk areas. Given the sequencing of the instant request relative to the full implementation of Section 2209, however, we urge you to at a minimum anticipate likely limitations once that regulation is in effect, by including some of those prohibitions in any approval of this petition. More specifically, the FAA's EA should prohibit the flight of Amazon's drones over amusement parks.

When the FAA solicits comment on implementing Section 2209, IAAPA expects to recommend that the FAA adopt a risk-based evaluation framework when assessing both the impacts of drone operations and petitions for airspace protections. Reliance on attendance levels or venue size as primary indicators of risk is insufficient and may fail to capture environments where concentrated exposure and operational complexity create elevated safety and security concerns.

While the FAA has not yet defined "amusement park" for purposes of implementing Section 2209, IAAPA believes that the state of Florida's statutory definition (509.013) can be useful here. To that end, IAAPA suggests that the FAA should prohibit Amazon Prime Air's proposed drone delivery operations over a fixed, permanent entertainment complex featuring a variety of recreational activities and attractions, together with associated lodging, dining, retail, and related facilities located adjacent to, contiguous to, or near the core park operations.

Consistent with this approach, Section 2209 provides the FAA with discretion to define appropriate boundaries and operational limitations. IAAPA anticipates recommending that the FAA permit each amusement park to propose clearly defined geographic boundaries based on property lines, together with a reasonable adjacent safety buffer—such as up to one nautical mile beyond the property boundary —to account for navigational variability and operational risk.

4. Sequencing Regulatory and Operational Actions

Most importantly, IAAPA urges the FAA to carefully consider the sequencing of its actions. Any expansion of commercial drone delivery operations should anticipate the likelihood of prohibitions over certain areas as a result of the implementation of statutory protections for facilities that Congress has identified as warranting such safeguards. We urge the FAA to exercise caution and patience where safety of large, outdoor gatherings of the public is at risk by anticipating these restrictions now rather than waiting for an adverse incident to occur.

This proposed action is likely to serve as a precedent for future large-scale drone delivery approvals nationwide, further underscoring the need to anticipate the likelihood of limitations once the FAA is able to establish a complete and functional regulatory framework by including those limitations concurrent with such approvals contemplated in this proceeding.

To that end, IAAPA recommends that the FAA:

• Finalize and implement Section 2209 regulations applicable to fixed site facilities

• Ensure that such facilities have a clear pathway to petition for airspace restrictions; and

• If the FAA is unable to complete implementation prior to acting on the instant petition, then it should anticipate and incorporate these protections into the operational framework governing drone delivery services now. It should do so by limiting the operation of drone delivery services considered in this EA over amusement parks as described above, rather than exposing the public to risk in the interstitial period between acting on this proceeding and fully implementing Section 2209.

Conclusion

IAAPA appreciates the opportunity to provide comments on this Draft EA. The integration of drones into the NAS presents opportunities, but it must be approached in a manner that is deliberate, balanced, and consistent with statutory guidance.

Given the implications of expanded commercial drone operations in a state with uniquely high concentrations of public gathering spaces and attractions, it is critical that the FAA ensure a thorough, transparent, and risk-informed review that aligns with NEPA and fully accounts for the protections contemplated under Section 2209.

We would welcome the opportunity to engage further with the FAA on these issues and to serve as a resource as the agency continues its work on both environmental review and regulatory implementation.

Sincerely,

Keith Stephenson
Director of Public Affairs IAAPA

FAA Response – 05_IAAPA

Thank you for your comments. Please refer to *Topic Specific Response 6: NEPA Process*.

Public Comment – 06_MBLLBV

Good afternoon,

On behalf of the cities of Bay Lake and Lake Buena Vista located within Orange County Florida, please see our response to your request for comments on the Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Florida. We appreciate the opportunity to provide feedback on this important matter.

Regards

Randy Singh
City Manager

(Transcript of email attachment follows)

April 8, 2026

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

Electronic Submittal Sent To: 9-faa-drone-environmental@faa.gov
Subject: Comments Regarding the Environmental Assessment for Amazon Prime Air Package Delivery Operations in Florida

Dear Federal Aviation Administration:

In response to a request for public comments, I am submitting the following on behalf of the municipalities of Bay Lake and Lake Buena Vista ("Cities"), with regard to the Federal Aviation Administration's Draft Environmental Assessment for Amazon Prime Air's proposed drone delivery operations in Florida, released for public review pursuant to the National Environmental Policy Act.

The Cities are uniquely situated in Orange County, Florida and contain numerous amusement parks, including all four of the Walt Disney World Resort theme parks, two water parks, a number of hotel and resort properties, as well as restaurants and entertainment areas for visitors and tourists. Each year, millions of visitors from around the world visit our Cities and amusement parks in a safe and secure environment. The approval of the proposed air package delivery operations compromises the safety and security of those visitors as well as our residents.

[A] ***1. Increased Security Concerns***
Amusement parks and resort properties are high-visibility, high-attendance public venues with established security postures and complex emergency management requirements. Routine third-party UAS delivery operations in proximity to these environments increase exposure to unauthorized surveillance, non-conforming payload carriage, and other anomalous UAS activity that could be disruptive in dense public settings. Absent a coordinated operational framework providing real-time visibility to on-property security teams, there is no reliable means to immediately distinguish authorized commercial UAS operations from unauthorized or potentially malicious activity. This lack of differentiation introduces ambiguity that is inconsistent with security practices for fixed-site venues where rapid threat identification and response are critical. Without defined coordination protocols, notification mechanisms, or integration with existing site security operations, routine UAS activity near these venues presents a situational awareness gap that may warrant further evaluation.

2. Significant Increases to Air Traffic Volume and Risks to Persons on the Ground
In addition, the proposed operational volume, potentially up to 1,000 flights per day per site within a 7.5 mile operating radius, creates a high likelihood of routine operations over densely populated areas. Amusement parks are uniquely concentrated outdoor environments with continuous guest occupancy, moving attractions, elevated structures, and dynamic pedestrian flow. Any loss-of-control event, unintended payload release, or system failure in these settings could result in immediate risk to persons and property on the ground. These risks are driven by operating environment and exposure rather than overall attendance size and are consistent with the rationale underlying Congressional recognition of amusement parks as safety-sensitive fixed sites.

3. Lack of Defined Airspace Protections and Buffers
The current proposal does not clearly address whether protective boundaries or lateral buffers would be established around fixed-site amusement parks. Given the limited margin for error inherent in open-air, high-density public environments, the absence of defined separation raises questions regarding how navigation error, environmental conditions, or system performance limitations would be managed. Prior

FAA practice in other high-density venues has recognized the value of defined boundaries and buffers to reduce operational ambiguity and enhance compliance.

[B] ***Recommended Considerations for Engagement***
The projected scale of operations, potentially exceeding 365,000 flights annually per site, represents sustained, high-frequency use of low-altitude airspace. While individual operations may meet applicable safety thresholds in isolation, the cumulative effect of continuous exposure over major public gathering venues has not been fully evaluated in the context of long-term safety, security, and operational impacts.

- *The application of risk-based frameworks for UAS operations near fixed-site amusement parks and similar high-density venues*
- *The establishment of defined boundaries or buffers to account for navigation error and environmental conditions*
- *Coordination, notification, or visibility measures to support on-property security awareness*
- *Deconfliction considerations in areas with known low-altitude sightseeing activity*
- *Evaluation of cumulative operational impacts associated with sustained high-frequency UAS delivery activity*

Until these issues are clearly addressed, the proposed expansion of high-frequency UAS delivery operations over or in close proximity to the Cities and its theme parks and supporting locations presents elevated considerations that may warrant further review and coordinated industry input.

Sincerely,

Randy Singh
City Manager

FAA Response – 06_MBLLBV

Thank you for your comments.

[A] The FAA's primary mission is the safety and efficiency of the National Airspace System, and the safety and reliability of the proposed drone operations have been carefully assessed. The FAA has determined that Prime Air's drones and operation does not create a hazard to users of the NAS or the public and can be conducted safely. For specific information on the FAA's role in assessing drone safety, please refer to *Topic Specific Response 4: Safety*.

Furthermore, 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. Those locations are selected by the operators. Land use and zoning are typically governed by state and local laws. Operators are responsible for complying with any such applicable laws relevant to establishing their operations. Operators are expected to site their distribution hubs in accordance with all local land use ordinances and zoning requirements.

[B] Please refer to *Topic Specific Response 6: NEPA Process*.