

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 January 2026 Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Kansas City, KS, and Kansas City, MO (Draft EA). The NOA announcing the public availability of the Draft EA was published on the FAA’s website on January 26, 2026, which included a public review and comment period through February 24, 2026.

In total, the FAA received 4 comment submissions. 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_MDC	Missouri Department of Conservation (MDC)
03_MDNR	Missouri Department of Natural Resources (MDNR)
04_SUC	Small UAV Coalition (SUC)

Public Comment – 01_AUVSI

Hello -

Please find attached comments from the Association for Uncrewed Vehicle Systems International (AUVSI) on the Amazon Prime Air Kansas City, KS and Kansas City, MO 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 24, 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 Kansas City, KS, and Kansas City, MO

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 Kansas City, KS and Kansas City, MO from two 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 OpSpecs 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 Kansas City, KS and Kansas City, MO communities. 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 Kansas City, KS and Kansas City, MO. 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_ MDC

To whom it may concern,

The Missouri Department of Conservation (Department) is constitutionally charged with protecting and managing Missouri's fish, forest, and wildlife resources for Missourians to use and enjoy, both today and in the future. To ensure that these resources are sustainable and resilient, the Department often provides technical input on various projects that will help avoid and minimize impacts to fish, forest, and wildlife resources and Department lands in the vicinity of a project area. The Department appreciates the opportunity to review and comment on the Draft Environmental Assessment (EA) for Amazon Prime Air Package Delivery Operations in Kansas City, Missouri and Kansas City, Kansas (Project). Please consider the following comments:

Upon review of the draft EA, Department staff identified concerns regarding potential conflict between delivery drones and wildlife, particularly birds.

The Kansas City Metropolitan Area is situated within the Mississippi Migratory Flyway, a major migration path for bird species throughout the western hemisphere. Urban environments are already hazardous for bird species due to effects of light pollution, collisions with buildings, and limited and often degraded resources for proper nesting and foraging habitat. Increased aerial traffic from delivery drones in the area may further exacerbate these hazards to vulnerable bird populations, potentially disrupt their natural predatory and natal behavior, resulting in cumulative negative effects, particularly on species of conservation concern.

*One species as an example is the peregrine falcon (*Falco peregrinus*). Once nearly extirpated from Missouri in the 1970s, this species was recently removed from the state endangered species list thanks to collaborative restoration efforts among the Department, conservation organizations, private partners, and the public. The densest populations of peregrine falcons in Missouri occur in urban centers such as Kansas City, where these cliff-adapted birds utilize buildings and industrial structures along the Missouri River to hunt migratory prey. Peregrine falcons are highly territorial and defensive, and documented conflicts with drone technology have occurred elsewhere. Such interactions can lead to property damage, injury to birds, or disturbance that forces breeding pairs to abandon nests, potentially resulting in chick mortality.*

To avoid and minimize these impacts, the Department requests continued coordination with the Project team to provide detailed technical guidance on drone implementation strategies that protect peregrine falcons and other wildlife resources. This collaboration will help ensure Missouri's natural heritage remains intact for future generations while facilitating economic interests.

Thank you for your coordination with the Department on the proposed Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Kansas City, Missouri and Kansas City, Kansas. Any questions about these comments may be directed to Department Policy Coordinator, Jordan Meyer, at 573-522-4115, extension 3197, or at Jordan.Meyer@mdc.mo.gov.

Jordan James Meyer (he/him/his)
Policy Coordinator
MO Dept. of Conservation
2901 W. Truman Blvd
PO Box 180
Jefferson City, MO, 65102
573-522-4115 ext 3197

FAA Response – 02_MDC

Thank you for your comments. The FAA conducted a comprehensive assessment of potential impacts to biological resources, including birds, and consulted with both the U.S. Fish and Wildlife Service (USFWS) and Missouri Department of Conservation (MDC). The FAA determined that the Proposed Action is unlikely to significantly affect wildlife in Missouri and the USFWS concurred with this determination. However, Prime Air will maintain a direct line of communication with the MDC to discuss any potential concerns regarding impacts on wildlife or habitat in the Action Area. In addition, Prime Air would also specifically coordinate with the managing entities of state parks and natural areas within the Action Area on the thoughtful placement and use of delivery sites within these areas as necessary. For additional information, please refer to Draft EA **Section 3.3, Biological Resources (Wildlife)**.

Public Comment – 03_MDNR

Good afternoon,

Please find attached, comments from the Missouri Department of Natural Resources on the MoDOT – Amazon Prime Air Package Delivery project.

Thank you,

Rachel Bruemmer
Executive Assistant
Department of Natural Resources
PO Box 176; Jefferson City, MO 65102-0176
573-751-3195
rachel.bruemmer@dnr.mo.gov

(Transcript of first email attachment follows)

February 23, 2026

Federal Aviation Administration
Suite 802W c/o AVS Environmental
800 Independence Ave SW
Washington, DC 20591
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 Kansas City, KS, and Kansas City, MO

TO: The Department of Transportation

Thank you for the opportunity to provide comments related to environmental considerations on the Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Kansas City, KS, and Kansas City, MO. Please see enclosed the department's General Comments; The department does not have specific comments to offer on the project at this time.

Please do not hesitate to contact me if you need any additional information, or if you have questions. I can be reached at 573-522-8277, or by email at segolene.renaze@dnr.mo.gov.

Sincerely,

*Ségolène Renazé
Policy Advisor
SR/rab*

(Transcript of second email attachment follows)

GENERAL COMMENTS

The Missouri Department of Natural Resources appreciates the opportunity to review the materials for the proposed project. The department offers the following general comments related to environmental considerations for use in evaluating your project's environmental impacts pursuant to National Environmental Policy Act as amended (42 U.S.C. §§ 4321, et seq.).

Geology and Geospatial Data

If a full Geologic Assessment is required for a project, the Missouri Geological Survey can be contacted directly at 800-361-4827. Other maps showing natural and cultural resources can be found at <https://dnr.mo.gov/land-geology/maps-data-research>.

Karst Topography

Springs, sinkholes, and caves are features on the landscape associated with karst topography that can act as direct conduits of surface water and pollutants to groundwater. As such, extra precaution should be taken to minimize disturbance of land in or around these features, and to avoid the introduction of pollutants to sensitive groundwater resources. Karst areas may also present the possibility of potential collapse.

Wells

Wells can act as conduits of pollutants to groundwater resources. Abandoned wells should be plugged prior to any land disturbance, and care should be taken to utilize appropriate best management practices to protect any currently operating wells. For more information on locating and plugging wells, please

visit the link below for the department's Wellhead Protection Section webpage or contact the department's Geological Survey Program directly. <https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/wells-drilling>

Water Protection

Best Management Practices

Best management practices should be utilized during project activities to limit the amount of sediment and other pollutants entering waters of the state, and to protect the water's chemical, physical, and biological characteristics. These practices include, but are not limited to, conducting work during low flow conditions whenever possible, keeping heavy equipment out of the water, and taking all necessary precautions to avoid the release of fuel or other waste products to streams and other waters. In addition, the department encourages the preservation of existing riparian or buffer areas around each water resource to limit the amount of sediments or other pollutants entering the water. Any stream banks, riparian corridors, lake shores, or wetlands denuded of vegetation should be stabilized and re-vegetated as soon as is practicable.

Watershed Conditions

Public Drinking Water

Proposed project personnel should be aware of nearby Public Drinking Water Districts. Work associated with any project should take into consideration the protection of surface and groundwater public drinking water supplies, implementing appropriate best management practices as necessary. For additional information regarding source water protection, please contact Ken Tomlin of the department's Public Drinking Water Branch at 573-526-0269.

Designated Uses

Water Bodies with Specific Designated Uses

Water bodies are assigned specific designated uses according to State of Missouri Water Quality regulations at 10 CSR 20-7.031(2). These waters are protected by numeric water quality criteria outlined in 10 CSR 20-7.031(5) and Table A, as well as general water quality criteria outlined at 10 CSR 20-7.031(4). Designated uses include the following:

- Protection and propagation of fish, shellfish and wildlife – warm water habitat (WWH)
- Human health protection (HHP)
- Irrigation (IRR)
- Livestock and wildlife protection (LWP)
- Secondary contact recreation (SCR)
- Whole body contact recreation – Category B (WBC-B)
- Protection and propagation of fish, shellfish and wildlife – cool water habitat (CLH)
- Drinking water supply (DWS)
- Industrial water supply (IND)
- Whole body contact recreation – Category A (WBC-A)

Water Bodies without Specific Designated Uses

Water bodies that are not assigned specific designated uses are still protected by general water quality criteria outlined at 10 CSR 20-7.031(4), and are subject to the acute toxicity criteria of Tables A and B, as well as whole effluent toxicity conditions.

Sensitive Waters

Table C, Waters Designated for Cold Water Habitat

Missouri's waters designated for Cold Water Habitat can be found at 10 CSR 20-7.031 Table C, and Table H, with associated criteria at 10 CSR 20-7.031 Table A.

Table D, Outstanding National Resource Waters

There shall be no lowered water quality in Outstanding National Resource Waters, as designated in 10 CSR 20-7.031 Table D.

Table E, Outstanding State Resource Waters

There shall be no lowered water quality in Outstanding State Resource Waters, as designated in 10 CSR 20-7.031 Table E.

Table F, Metropolitan No-Discharge Streams

Project personnel should maintain compliance with 10 CSR 20-7.031(7) for any land disturbance activities that are within a Metropolitan No-Discharge stream's watershed. Discharge to metropolitan no-discharge streams is prohibited, except as specifically permitted at 10 CSR 20-7.031(7). These exceptions include uncontaminated cooling water, permitted stormwater discharges in compliance with permit conditions, and excess wet-weather bypasses not interfering with designated uses.

Table I, Biocriteria Reference Locations

Biocriteria reference locations are water body segments used in the development of water quality standards and the assessment of aquatic life protection due to their high degree of biological integrity. Reference water locations for some aquatic habitat types can be found in 10 CSR 20-7.031 Table I. These waters should be protected in order to maintain their reference status.

Table J, Losing Streams

A losing stream is defined as a stream that distributes 30 percent or more of its flow during low flow periods through permeable geologic material into a bedrock aquifer. These features are associated with karst topography, which underlies much of the state, and can act as conduits of pollutants to groundwater resources. Please contact the department's Missouri Geological Survey at 800-361-4827 for more information or to determine if the project will cross or impact any losing streams. If losing streams are in the project area, additional precautions and best management practices should be put in place to protect sensitive water resources. Losing streams are protected by effluent regulations at 10 CSR 20-7.015(1)(B)3 and (4) and Water Quality Standards at 10 CSR 20-7.031(1)(N), (5)(C) and (13).

303(d) Impaired and 305(b) Threatened Waters

Waters assessed by the department as threatened or impaired could potentially be impacted by projects. Project personnel should ensure that activities related to the project do not cause an increase in the pollutants impairing these waters nor re-suspend any pollutants that might be bound to sediment. Additional information can be found by contacting the department's Water Protection Program at 573-526-1446 or by visiting the link below.

<https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/impaired-waters>

Waters with Approved Total Maximum Daily Loads

Impairments should not be made worse by this project's activities. The department staff may require extra protections when developing permits or certifications to comply with total maximum daily load and wasteload allocations. Additional information can be found by contacting the department's Water Protection Program at 573-526-1446 or by visiting the link below.

<https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/tmdls>

Permitting Obligations

Clean Water Act Sections 401 and 404

Projects that have the potential to discharge fill or dredged material into a jurisdictional water of the United States must receive a Clean Water Act Section 404 Permit Authorization from the U.S. Army Corps of Engineers (USACE), and a Section 401 Water Quality Certification from the department. Some examples of activities that typically require a 404 permit and 401 certification include stream bank stabilization, installation or replacement of culverts and low water crossings, fill impacts related to residential and commercial developments, and infrastructure maintenance. To learn more about the 404 permits visit the USACE's website: www.rrs.usace.army.mil/rrs/home/permitting. For more information about 401 water certification from the department, go to

<https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/section-401-water-quality>

If discharge into water has occurred, or will occur, project personnel should immediately contact the appropriate USACE District (link below) and the department's Operating Permits Section at 573-522-4502 for more information.

<http://www.mvr.usace.army.mil/Portals/48/docs/regulatory/MORegBound.pdf>

Land Disturbance

The project must apply for a land disturbance permit from the department if it involves construction disturbance activities of one or more acres, or construction activities that disturb less than one acre when part of a larger common plan of development or sale that will disturb a cumulative total of one or more acres over the life of the project. Land disturbance activities include clearing, grubbing, excavating, grading, filling and other activities that result in the destruction of the root zone. Disturbance to valuable resource waters, including springs, sinkholes and losing streams, could require additional conditions or permits.

Information and application for online land disturbance permits are located at

<https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/stormwater/construction-land-disturbance>.

Questions regarding permit requirements may be directed to the appropriate Regional Office.

<https://dnr.mo.gov/about-us/division-environmental-quality/regional-office>

Demolition and Construction Waste Management Information on managing construction and demolition waste can be found at the following link <https://dnr.mo.gov/waste-recycling/reduce-reuse-recycle/what-to-do-with-specific/construction-renovation-demolition>

Hazardous Waste

The department's interactive map allows users to access information about hazardous substance and petroleum storage tank site investigations and cleanups. Please review site investigations and cleanups in the project area by accessing the interactive map at the following link: <https://dnr.mo.gov/waste-recycling/long-term-stewardship-lts/environmental-site-tracking-research-tool-e-start>. Should the project area intersect with one or more hazardous substance or petroleum storage tank sites, please contact erp@dnr.mo.gov for additional guidance prior to initiating excavation.

During the project, if any underground tanks or contaminated soil is discovered, workers should withdraw to a safe distance and notify the department's spill line at 573-634-2436.

It is the generator's responsibility to determine if materials generated during construction and demolition, are hazardous wastes. Demolition-related waste categories typically include paint residue (paint chips, paint scrapings, etc.); demolition debris (metal and boards that have been painted with lead-based or other heavy metal-based paint); and scrap metal (metal objects that contain lead or other heavy metals). A hazardous waste determination is not required for materials that will be reused or recycled without additional processing.

Asbestos

Prior to demolition activities, regulated structures must be thoroughly inspected by a Missouri-certified asbestos inspector to determine if any Asbestos Containing Materials are present, and a notification made to the department at least ten working days prior to demolition. Regulated structures include any building which has been used as a commercial, institutional, or industrial building (even if it was historic use), and projects involving two or more residential structures. In addition, this includes but is not limited to the following "non-building" structures: bridges, pipelines, cooling towers, chimneys, dams, and tunnels. Any asbestos found must be properly managed to prevent release of asbestos fibers.

Solid Waste

Information about solid waste uncovered during construction activities can be found at the following link <https://dnr.mo.gov/document-search/managing-solid-waste-encountered-during-excavation-activities-pub2192/pub2192>.

No waste may be buried on-site or at an alternate site, except for clean fill. Clean fill is defined by the Revised Statutes of Missouri as "uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinderblocks, brick, minimal amounts of wood and metal, and inert solids as approved by rule or policy of the department for fill, reclamation or other beneficial use." Clean fill must not contain protruding metals or demolition debris. Although not regulated as waste, placement of clean fill materials may be subject to requirements of the department's Water Protection Program if it is placed in contact with surface or subsurface waters of the state or would otherwise violate water quality standards.

Air Pollution**Dust**

Ensure fugitive particulate matter emissions, such as dust, resulting from the project do not remain on surfaces or in the air beyond the property line of origin. 10 CSR 10-6.170 restricts the emission of particulate matter to the ambient air beyond the premises of origin. Additional information on general dust emissions may be found here <https://dnr.mo.gov/document-search/odor-dust-asbestos-open-burning-freon-emissions-pub2200/pub2200>.

Open Burning

The open burning of refuse and trade waste is restricted according to 10 CSR 10-6.045. Construction, demolition, and trade waste cannot be open burned, except for untreated wood. Brush from land clearing activities may be burned if the burning is conducted outside the city limits and greater than 200 yards from the nearest occupied structure. Additional information on open burning can be found at <https://dnr.mo.gov/document-search/facts-open-burning-under-missouri-regulations-pub2047/pub2047>.

The above comments concern potential environmental impacts related to air, land and water. Feedback on this project related to the other topics should be directed as described below:

- *Historic Preservation: Project personnel should check with the department's State Historic Preservation Office to determine if a Section 106 Review is needed. Information on the Section 106 Review can be found on the department's web site at <https://www.mostateparks.com/page/84261/section-106-review> or by contacting the State Historic Preservation Office at 573-751-7858.*
- *Floodplain: For information concerning flood plains impacts, contact the Missouri State Emergency Management Agency, Floodplain Management and Mitigation Branch, at 573-526-9100 or 2302 Militia Drive, Jefferson City, MO 65101.*
- *Endangered Species: The MDC is responsible for collecting and managing information on the location and status of endangered species in the state. Contact MDC's Endangered Species Coordinator at 573-751-4115 or P.O. Box 180, Jefferson City, MO 65102 for information about endangered species impacts.*

We appreciate the opportunity to provide comments for the proposed project.

FAA Response – 03_MDNR

Thank you for your comments. The Proposed Action would not affect the resources included in the following categories and thus were not analyzed in detail:

- **Aviation Emissions and Air Quality:** The MK30 drone is battery-powered and does not generate emissions that could result in air quality impacts. Electricity consumed for battery charging at the PADDC would be minimal. The electricity consumed for the Proposed Action would come from the power grid.

- **Biological Resources (Fish and Plants):** The Proposed Action would not result in impacts on fish and plant species as the action is launched from developed/industrial areas, transported by drone, and delivered to residential houses and communities.
- **Coastal Resources:** The Proposed Action would not directly affect any shorelines or alter the use of shoreline zones or be inconsistent with any National Oceanic and Atmospheric Administration–approved state Coastal Zone Management Plan as there are no shorelines in the proposed area of operations. The study areas are located several hundred miles from the nearest shoreline.
- **Hazardous Materials, Solid Waste, and Pollution Prevention:** The Proposed Action would not result in any construction, development, or any physical disturbances of the ground. Therefore, the potential for impacts related to hazardous materials, pollution prevention, and solid waste is not anticipated.
- **Natural Resources and Energy Supply:** The Proposed Action would not require the need for unusual amounts of natural resources and materials, or those in scarce supply. The MK30 drone is powered by a rechargeable battery which does not consume fossil fuel (e.g., gasoline or aviation fuel) resources. The battery is charged by an electric charger which can leverage the local grid to charge the batteries. The MK30 drone would be used to replace personal vehicle trips to stores for urgently needed items; thus, the MK30 drone is expected to reduce consumption of fossil fuel resources.
- **Water Resources (Wetlands, Floodplains, Surface Water, Groundwater, Wild and Scenic Rivers):** The Proposed Action would not result in any further construction of facilities and does not include any new facilities in areas identified as flood hazard areas according to the 1% annual chance (100-year) floodplain (non-critical actions) and 0.2% annual chance (500-year) floodplain (critical actions) that are currently used to determine the floodplain impacts for the Proposed Action.¹ The Proposed Action would not result in any changes to existing discharges to water bodies, create a new discharge that would result in impacts on surface waters, or modify a water body. The Proposed Action does not involve land acquisition or ground disturbing activities that would withdraw groundwater from underground aquifers or reduce infiltration or recharge to ground water resources through the introduction of new impervious surfaces.

For additional information, please refer to Draft EA **Section 3.2, Environmental Impact Categories Not Analyzed in Detail**.

Public Comment – 04_SUC

Please confirm receipt. Thank you.

Greg

Gregory S. Walden

Counsel

Small UAV Coalition

gregorywalden@smalluavcoalition.org

202-403-9904

¹ Executive Order 14030, Climate-Related Financial Risk, May 2021.

(Transcript of email attachment follows)

Small UAV Coalition comments
Federal Aviation Administration Draft Environmental Assessment
Amazon Prime Air Delivery Operations in Kansas City, Missouri and Kansas City, Kansas
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 two new Prime Air Drone Delivery Centers (“PADDCs”) in the Kansas City metro area to destinations within a 7.5-mile radius. Each PADDC is co-located with an Amazon warehouse. This Op Specs amendment is the Federal action triggering review under the National Environmental Policy Act (“NEPA”). The draft EA states that up to 1,000 flights from each PADDC per operating day will be conducted from 6 am 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 pm, 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. 2

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.”

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.

For the noise impacts, the FAA examined noise at three stages: the PADDCC; en route while the drone will operate between 180 and 377 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 on Amazon’s property. During the en route phase, 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 noise at any residential zoned property line will not exceed DNL 48.1 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 at any location in the operating area.

With respect to Section 4(f) resources, the Coalition agrees with the FAA’s conclusion that the proposed flights would not cause substantial impairment, or physical or constructive use of any section 4(f) resources, 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 25, 2026

FAA Response – 04_SUC

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