Appendix D

Section 106 Resources and Agency Consultation

D-1 SHPO Consultation

U.S. Department
of Transportation
Federal Aviation Administration

Aviation Safety

800 Independence Ave., SW.

Washington, DC 20591

Nebraska State Historic Preservation Office
Nebraska State Historical Society
1500 R Street
Lincoln, NE 68508-1651

Re: Concurrence with No Adverse Effect to Historic Properties for Commercial Drone Delivery Operations around Omaha, NE

State Historic Preservation Officer:

The Federal Aviation Administration (FAA) is currently evaluating a proposal from Amazon.com Services, doing business as Amazon Prime Air, to introduce drone package delivery operations at one (1) location near Omaha, NE. The FAA has determined the proposed action, which requires FAA approvals to enable operations, is an undertaking, as defined under the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR § 800.16(y)) (Section 106). In accordance with Section 106, the FAA is requesting the State Historic Preservation Officer (SHPO) concurrence on the definitions of each Area of Potential Effect (APE) and the agency's finding of *no adverse effects* to historic properties associated with the Proposed Undertaking.

Proposed Undertaking
Prime Air is seeking authorization to conduct commercial package deliveries using drones at 1 location near the greater Omaha, NE metro area. The address of this location is 14248 Highway 370, Omaha, NE. Prime Air intends to introduce its drone delivery capabilities in 2026 and has requested the FAA to authorize the operation of its MK30 drone, so it can provide drone package delivery services across the operating area. Prime Air projects flying up to 1,000 MK30 drone delivery flights per operating day from 1 Prime Air Drone Delivery Center (PADDC) (constituting 2,000 individual operations) located around the metro area noted above, with each delivery taking a package to a customer delivery address before returning to the PADDC. The number of flights per day would vary based on customer demand and weather conditions. Prime Air is taking an incremental approach to operations and expects to gradually ramp up to 1,000 delivery flights (2,000 operations) per day per PADDC as consumer demand increases over time. Drone flights could be conducted up to 365 days a year between 6:00 a.m. and 10:30 p.m.

<u>Unmanned Aircraft</u>
As pictured in **Attachment A**, the Prime Air MK30 drone is a hybrid multicopter fixed-wing tail-sitter drone with six propulsors allowing it to take-off and land vertically and transition to wing borne flight. Its airframe is composed of staggered tandem wings for stable wing-borne flight. The drone weighs

approximately 78 pounds and has a maximum takeoff weight of approximately 83 pounds, which includes a maximum payload of 5 pounds. It has a maximum operating range of 7.5 miles and can fly up to about 67 miles per hour (mph) during wing-borne flight. It uses electric power from rechargeable lithium-ion batteries and is launched vertically using powered lift and converts to using wing lift during en route horizontal flight. The MK30 is equipped with collision avoidance technology to help avoid conflicts with other aircraft and drones during flight.

Flight Operations

Each drone delivery flight includes an outbound flight from the PADDC to the delivery location and an inbound flight from the delivery location to the PADDC. Therefore, each delivery consists of 2 operations, as defined by the FAA. The MK30 drone would generally be operated at an altitude between 180 and 377 feet above ground level (AGL). The outbound en route altitude to a delivery location is expected to be flown between 180 and 279 feet AGL. The inbound en route altitude is expected to be flown between 279 and 377 feet back to the PADDC. At a delivery location, the drone would descend vertically to a stationary hover and drop a package to the ground. Once a package has been delivered, the drone would ascend vertically to the inbound transition altitude and depart the delivery area while climbing to the en route altitude to return to the PADDC. The PADDC is a controlled area wherein drone flights are launched and recovered. The drone would fly a predefined flight path that is set prior to takeoff. Flight missions would be automatically planned by Prime Air's flight planning software, which assigns, deconflicts, and routes each flight. In accordance with FAA safety requirements, the drone would avoid operating over areas with dense human populations, such as over roadways, public gathering spots, etc.

A typical drone flight profile can be broken into the following general flight phases: takeoff, en route outbound, delivery, en route inbound, and landing, as depicted in **Attachment B**.

Takeoff
Once a package is loaded onto the MK30 drone and the drone is cleared for departure from the PADDC, the drone takes off from the ground vertically to an altitude of about 115 feet AGL and then transitions and climbs to its en route altitude of about 200 feet AGL (ranges from 180 and 279 feet AGL). The takeoff phase of flight would last less than one minute and result in maximum noise exposure levels (Lmax) of approximately 70 dB at a distance of 75 feet from the PADCC. These noise levels are equivalent to the noise generated from a household vacuum cleaner at a distance of 10 feet[1].

En Route Outbound
The en route outbound phase is the part of flight in which the MK30 drone transits from the PADDC to a delivery point on a predefined flight path. During this flight phase, the drone will typically operate at an altitude of 200 feet AGL with a typical airspeed of 67 mph. Noise levels generated from enroute outbound flight would be approximately 60 dB Lmax at a distance of 76 feet abeam the drone's flight path and are equivalent to the noise generated from normal speech at a distance of 3 feet.

Delivery
The delivery phase consists of descent from the en route altitude to a delivery point to deliver a package. The MK30 drone transitions and descends to about 140 feet AGL and then vertically descends to about 13 feet AGL while maintaining position over the delivery point. The drone hovers while dropping the package and then proceeds to climb vertically back to the inbound transition altitude of 197 feet AGL. The MK30 then transitions and climbs to its en route inbound altitude of 345 feet AGL (ranges from 279

[1] https://www.faa.gov/regulations_policies/policy_guidance/noise/basics

to 377 feet AGL). The delivery phase of flight would last approximately one minute and result in noise levels of approximately 69 dB Lmax at a distance of 75 feet from the delivery location. These noise levels are nearly identical to those generated during takeoff and would be equivalent to a household vacuum cleaner at a distance of 10 feet.

En Route Inbound
The MK30 drone continues to fly at a typical altitude of 345 feet AGL at a speed of 67 mph towards the PADDC. Noise levels generated from enroute outbound flight would be nearly identical to those from enroute inbound flight with an Lmax of approximately 61 dB at a distance of 76 feet abeam the drone's flight path.

Landing
The drone decelerates as it approaches the PADDC and descends to the transition altitude of 197 feet AGL and where it transitions from horizontal flight to vertical flight, coming to a zero-speed position over its assigned landing pad. The MK30 drone slowly vertically descends over its assigned landing pad and lands on the pad. Noise levels generated from landing would be nearly identical to those generated from takeoff with an Lmax of approximately 70 dB at a distance of 75 feet from the PADCC.

Area of Potential Effects
In accordance with 36 CFR § 800.4(a)(1), the FAA has defined the APE in consideration of the undertaking's potential direct and indirect effects. The proposed APE is the drone operating area associated with the PADDC, as outlined in red in **Attachment C**. The APE encompasses a 7.5-mile radius operational area centered at the PADDC and encompassing approximately 175 square miles. The total acreage within the APE is approximately 113,000 acres.

Identification of Historic Properties
To identify historic properties within the APE, the FAA cross referenced the most recent versions of the National Register of Historic Places (National Register) Database and Federal Determinations of Eligibility (DOE) Database with the information available through the Nebraska National Register of Historic Places GIS portal, the Nebraska Historic Building Survey Project website, and survey files provided by the Nebraska Historical Society staff.[2] Where possible, numbers of district contributors were verified through review of publicly available documentation (National Register nominations or survey documentation) accessible through the National Register Database, the state GIS portals, and as provided by staff. In a small number of cases where locational information was vague or missing, some information such as location verification was completed with assistance from Google Earth and the internet.

Following this methodology, 1 historic district with a total of approximately 44 contributing features, 21 individual historic properties, and 1 National Historic Landmark were identified within the APE. Based on the available information, this results in a total of 67 historic properties across all resource types. A list of identified historic properties is provided in **Attachment D.**

Assessment of Effects
Given the small size of the MK30 drone and predicted sound levels, operations would not produce vibrations that could impact the architectural structure or contents of any structure in the proposed APEs. While the MK30 drone is not expected to generate significant noise levels at or within any historic

[2] The most recent versions of the National Register and Federal DOE databases were last updated on June 24, 2025.

property, the FAA considered drone delivery noise and potential visual effects on historic properties where a quiet setting or visually unimpaired sky might be a key attribute of the property's significance.

Predicted Sound Levels

Based on a noise analysis using sound level measurement data for the MK30 drone, the estimated maximum sound exposure level (SEL) for the takeoff, delivery, and landing phases of flight is approximately 90.5 (at 20 feet), 92.1 (at 25 feet), and 91.8 dB (at 20 feet), respectively (see **Attachment E**). Predicted sound levels decrease as distances from the drone increase. The maximum SEL for the en route phase is approximately 63.7 dB when the drone at an altitude of 200 feet AGL and flying at approximately 67 mph.

Based on 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 period from 6:00 a.m. to 7:00 a.m. and 10:00 p.m. to 10:30 p.m., a Day-Night Average Sound Level (DNL) of 65 dB could extend up to 150 feet from each PADDC, which would then decrease as the distance from each PADCC increases. Because the beginning and ending portions of the operational timeframe occur during hours considered part of a nighttime period (defined as between 10:00 p.m. and 7:00 a.m.) the noise analysis includes a 10 dB penalty which is applied to the 100 operations that are anticipated to occur from 6:00 a.m. to 7:00 a.m. and 10:00 p.m. to 10:30 p.m. During these operational periods, 1 nighttime operation is considered equivalent to 10 daytime operations consistent with calculation of the DNL noise metric. These 100 nighttime delivery operations would be equivalent to 1,000 daytime deliveries and, when combined with the daytime operations, would be equivalent to a combined total of 1,900 daytime equivalent delivery operations.[3]

The drone is expected to typically fly the same outbound flight path between PADDCs and delivery points and inbound flight path back to the PADDCs. While the total average daily deliveries from each PADCC is 1,000, the number of overflights in a day will be dispersed because PADCCs are centrally located in each proposed operating area and delivery locations would be distributed throughout the proposed operating areas. A conservative estimate for the maximum number of overflights over any one location would be half, or 500 daily delivery overflights. To account for operations from PADCCs during the period from 6:00 a.m. to 7:00 a.m. and from 10:00 p.m. to 10:30 p.m., it is assumed approximately 50 of the 500 daily delivery overflights (10%) would occur during these periods. These 50 nighttime delivery overflight operations would be equivalent to 500 daytime deliveries. When combined with the daytime delivery overflight operations, this would be representative of a combined total of 950 daytime equivalent delivery overflight operations. Since each delivery involves both an outbound and inbound flight path, this equates to 1,900 daily overflights. It was conservatively assumed that when two or more MK30 drone operating areas overlap, overflights associated with an additional 950 daytime equivalent deliveries would be estimated, per operating area overlap. Based on these assumptions, en route noise levels could reach up to DNL 46.0 dB in any location within the action area, and for areas with two overlapping operating areas, the estimated en route noise levels could reach up to 48.9 dB, respectively.

Due to the inherent uncertainty of the exact delivery site locations, the noise analysis developed a minimum and maximum representative average annual daily distribution of deliveries that could occur at a single delivery location in 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

[3] No drones would be operated beyond the stated 6 a.m. to 10:30 p.m. period. This discussion is to illustrate how the noise is modeled and weighted for different times during a typical 24-hour cycle.

delivery will occur during the nighttime period between 6:00 a.m. and 7:00 a.m. and 10:00 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 outbound en route altitude is expected to be flown between 180 and 279 ft AGL. The inbound en route altitude is expected to be flown between 279 and 377 ft AGL back to the PADDC. Based on the maximum distribution of deliveries that could occur at a single delivery location in each operating area, the resulting noise exposure at a distance of 125 feet[4] from deliveries would not be expected to exceed DNL 50.1 dB, even in instances where there is overlap between two PADCC operating areas.

Potentially Sensitive Historic Properties

Within 0.5 miles of a PADDC

The areas most likely to experience visual or auditory effects resulting from the undertaking are in close proximity to a PADDC. In these locations, drone operations would be concentrated due to the frequency of inbound and outbound flights. However, there are no known historic properties located within 0.5 miles of any of the PADDCs. Beyond 0.5 miles, drone operation would be more disbursed and at elevations well above typical visual line-of-sight.

Historical Significance Considerations

Historic properties with historical significance that could be affected by the undertaking include properties where a quiet or pre-industrial setting is essential to the integrity of the resource. These historic properties may include cemeteries, areas where outdoor religious practices may occur, properties associated with early settlement or habitation, or tribal cultural resources. Based on these criteria, there are no known historic properties within the APE that is a park, religious institution, cemetery, or has significance that is partially based on a quiet or pre-industrial setting.

Assessment of Effects

As outlined in 36 CFR § 800.5(a), an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The undertaking does not include any actions that would physically alter a historic property in any way, nor would it change the use of a historic property or involve the transfer of property out of Federal ownership. Any adverse effects that may result from the undertaking are limited to the potential introduction of visual, atmospheric, or audible elements that could diminish the integrity of the property's significant historic features. Because these historic properties include character-defining features or whose historic integrity is strongly associated with quiet, rural, pre-industrial, or otherwise natural settings, feeling, or associations, they would be considered sensitive to the noise or visual intrusions that could result from operation of drones over, into, or in their general vicinity.

[4] A distance of 125 ft from the delivery point is representative of the typical distance of a residential property line from a delivery based on the average lot size for sold homes as reported in the 2022 US Census and reflects a property with dimensions of a 123.55 x 123.55-ft square. 125 ft represents a 125-ft lateral width of the parcel rounded up to the nearest 25 ft. Available: https://www.census.gov/construction/chars/xls/soldlotsize_cust.xls, accessed January 18, 2024.

The noise modeling methodology and methods presented in the Draft Environmental Assessment are suitable for the evaluation of Federal actions in compliance with the National Environmental Policy Act (NEPA) and other applicable environmental regulations or federal review standards at the discretion and approval of the FAA. In particular, the analysis is intended to function as a nonstandard equivalent methodology under FAA Order 1050.1G, and therefore, required prior written consent from the FAA's Office of Environment and Energy for each project seeking a NEPA determination. The results presented above are expressed in terms of the DNL, considering varying levels of operations for areas at ground level below each flight phase.

The FAA has not developed a visual effects significance threshold; however, factors the FAA considers in assessing significant impacts include the degree to which the action would have the potential to: (1) affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources; (2) contrast with the visual resources and/or visual character in the study area; or (3) block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations. The Proposed Undertaking makes no changes to any landforms or land uses, and visual effects would be short-term in nature; thus, there would be no adverse effect to the visual character of the area. Excluding ground-based activities supporting the drones, operations would be occurring in airspace only. The FAA estimates that, at typical operating altitude and speeds, the drone would be observable for approximately 3.6 seconds during en route flight by an observer on the ground.

As noted above, there are no known historic properties that could be categorized as having historical significance that could be diminished by introductions of new visual, atmospheric, or audible elements. All of the historic properties in the APE are single-family residences, institutions or civic building, industrial or commercial buildings, or are otherwise have no above-ground features that could be affected by the project. All these properties are currently subject to typical auditory and visual disruptions associated with vehicular or overhead flight traffic.

Based on the historical significance associations of the properties, anticipated noise levels, distance of historic properties from the most heavily trafficked areas near PADDCs, the brief duration of any potential visual, atmospheric, or auditory intrusions, FAA concluded a finding of *no adverse effects* to historic properties for this undertaking.

Conclusion
The FAA requests your concurrence on the definition of the proposed APE and with the FAA's finding of *no adverse effects* from the Proposed Undertaking.

Your response within the next 30 days will greatly assist us in our environmental review process. If you would like to consult with the FAA about this undertaking, please contact Christopher Hurst via email at 9-faa-drone-environmental@faa.gov.

Sincerely,

Joseph K. Hemler Jr

Digitally signed by Joseph K. Hemler Jr
Date: 2026.05.15 06:51:40 -04'00'

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

Enclosures:
Attachment A – Amazon Prime Air MK30 Drone
Attachment B – MK30 Drone Flight Profile
Attachment C – Proposed Areas of Potential Effects
Attachment D – Identified Historic Properties
Attachment E – Technical Noise Report

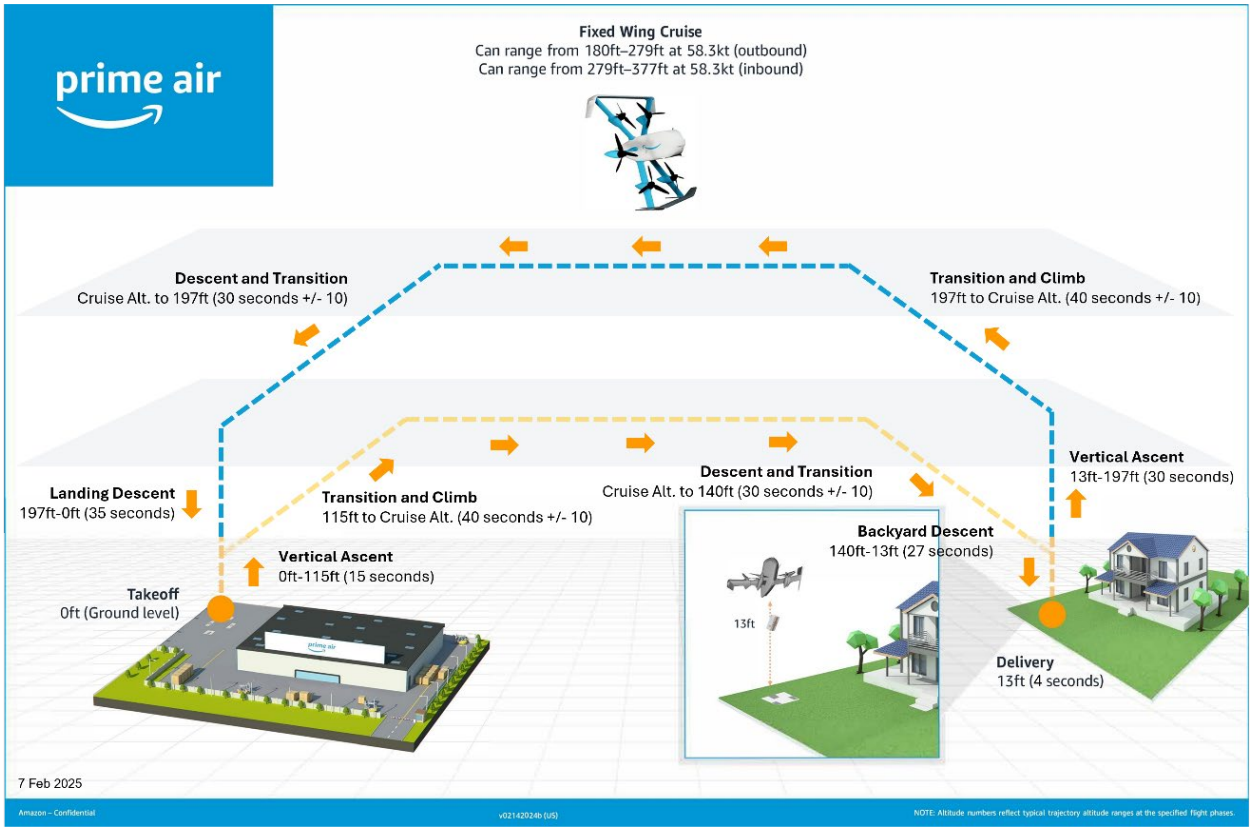
Attachment A
Amazon Prime Air MK30 Drone

Amazon Prime Air MK30 Drone

Weight – 78 lbs.
Payload – 5 lbs.
Cruise Speed – 62 mph
Ceiling – 400 ft
Range – 7.5 mi (15 min)
Operations – 365,000/yr (1,000/day)
Operating Times – 6am – 10:30pm
Electrically powered

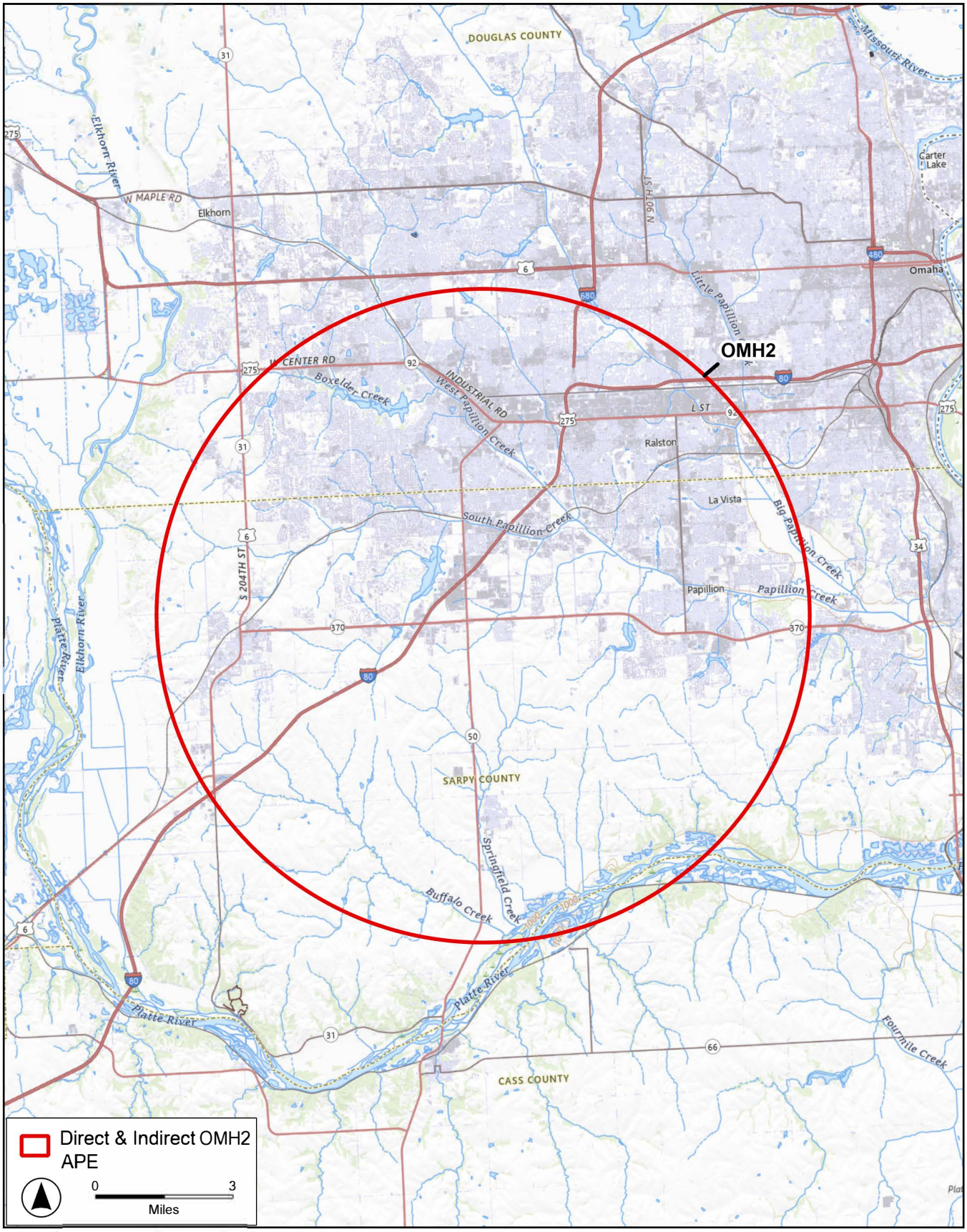
Operate from a PADDC – Prime Air Drone Delivery Center

Attachment B
MK30 Drone Flight Profile



MK30 Drone Flight Profile

Attachment C
Proposed Areas of Potential Effects

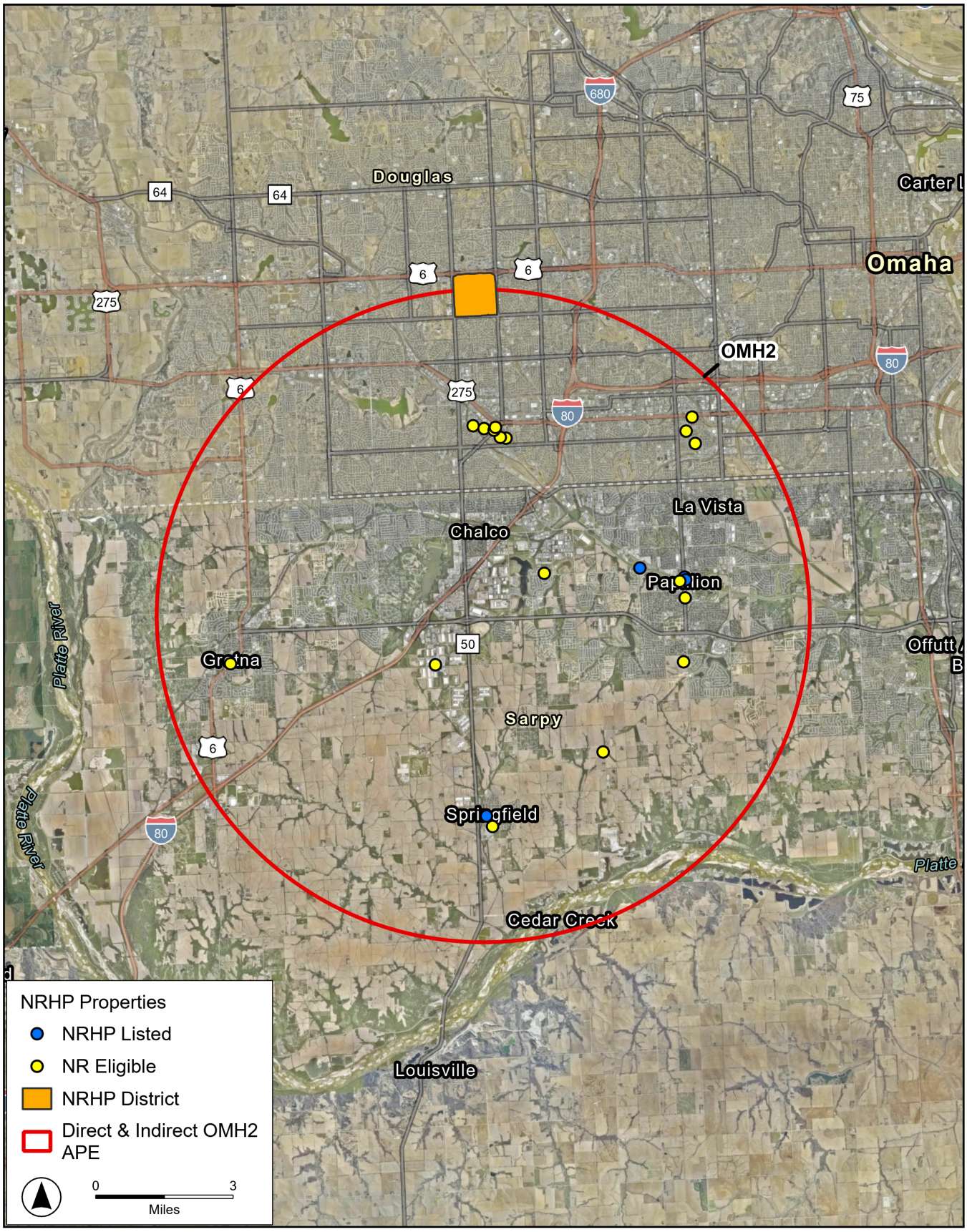


SOURCE: ESA, 2026; Nebraska SHPO, 2026.

D202200549_00 - Confidential Client AAM NEPA Support

Figure 1
Project Location
PADDC OMH2

ESA



SOURCE: ESA, 2026; Nebraska SHPO, 2026.

D202200549_00 - Confidential Client AAM NEPA Support

Figure 2
NRHP Resources with Project Location

ESA

Attachment D
Listed and Eligible NHRP Resources

Table D-1: Historic Properties within the OMH2 APE

Resource Name	Type	County	City	Status (Eligible/ Listed)	District Contributors
14001 L Street	Building	Douglas	Omaha	Eligible	
4716 S.78th Street	Building	Douglas	Ralston	Eligible	
475 S.3rd Street	Building	Sarpy	Springfield	Eligible	
501 S.Bryan Street	Building	Sarpy	Gretna	Eligible	
5042 S. 80th Street	Building	Douglas	Ralston	Eligible	
7765 Maywood Street	Building	Douglas	Ralston	Eligible	
Big Papillion Creek Bridge	Structure	Sarpy	La Vista	Listed	
Farmstead	Building	Sarpy	Papillion	Eligible	
Farmstead	Building	Sarpy	Chalco	Eligible	
Farmstead	Building	Sarpy	Richfield	Eligible	
Farmstead	Building	Sarpy	Chalco	Eligible	
Father Flanagan's Boys' Home	District	Douglas	Boys Town	NHL	44
German Bank of Millard	Building	Douglas	Omaha	Eligible	
Hahn, H.A. House	Building	Sarpy	Papillion	Eligible	
Koch, Herman Residence	Building	Douglas	Omaha	Eligible	
Kurz Omaha Village	Site	Sarpy	Papillion	Listed	
Millard Public School	Building	Douglas	Omaha	Eligible	
Papillion Public Works Building	Building	Sarpy	Papillion	Eligible	
Sautter, John, Farmhouse	Building	Sarpy	Papillon	Listed	
Sieck, Johanna Residence	Building	Douglas	Omaha	Eligible	
Springfield Community Hall	Building	Sarpy	Springfield	Listed	
Third Sarpy County Courthouse	Building	Sarpy	Papillon	Listed	
Von Dohren Sr., William Residence	Building	Douglas	Omaha	Eligible	

Total Historic Districts	1
Total District Contributors	44
National Historic Landmarks	1
Total Individual Historic Properties	21
Total Historic Resources	67

Attachment E
Technical Noise Report

The Technical Noise Report included in the original agency consultation has been omitted from this appendix, but can be found in Appendix E.

Nebraska State HISTORICAL SOCIETY

1500 R Street, Lincoln, NE 68508-1651

NESHPO USE ONLY

Date Received HP Number

NESHPO SECTION 106 PROJECT REVIEW FORM

Submission of a completed Section 106 Project Review Form with adequate information constitutes a request for review pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. More information may be required to adequately complete the Section 106 review process. Please submit this completed form to NSHS.S106@nebraska.gov.

For more information, see NESHPO's Section 106 Review and Compliance FAQ page: https://history.nebraska.gov/historic-preservation/review-and-compliance-section-106/.

NOTE: Section 106 regulations provide for a 30-day response time by the Nebraska State Historic Preservation Office (NESHPO) from the date of receipt.

I. PROJECT STATUS

- ☐ Federal Undertaking Anticipated (Applied for Federal Assistance)
- ☒ Federal Undertaking Established (Federal Assistance Received)
- ☐ Due Diligence Project (No Federal Assistance Anticipated)
- ☐ Alteration to or Resubmission of a Previously Submitted Project (HP# _____)
- ☐ Submitted under a Programmatic Agreement (PA) (title/date: _____)
- ☐ Previously applied/will apply for Nebraska Historic Tax Credit

II. PROJECT SUBMISSION

Project Name (if applicable)
Commercial Drone Delivery Operations Around Omaha, NE

Agency Project No. (if applicable)
FAA

Nearest City/Town
Omaha

County
Cass, Douglas, Sarpy counties

Location (e.g., coordinates, legal description, address—no P.O. Box numbers)
14248 Highway 370, Omaha, NE 68138

Is this project located within a Certified Local Government (CLG)? ◉ **YES** Omaha ○ **NO** ○ **DO NOT KNOW**

Agency (providing funds, license, permit, or other assistance)/Designee
Federal Aviation Administration (FAA)

Agency/Designee Contact Name

Agency/Designee Contact Email Address

Agency/Designee Address

Agency/Designee Contact Phone Number

III. PROJECT SUBMISSION

A. Project Type (select all that apply)

- ☐ New Construction
- ☐ Demolition
- ☐ Rehabilitation
- ☐ Replacement/Repair
- ☐ Utilities/Infrastructure
- ☒ Other: Drone Operation

B. Attachments Included (select all that apply)

- ☒ Map(s) including Area of Potential Effect (APE)
- ☐ Photographs
- ☒ Cultural Resources Report/Inventory
- ☐ Archeological Site Form(s)
- ☐ Spatial Data Files (e.g., .kmz, .shp)
- ☒ Other: Consultation Letter

NESHPO USE ONLY

Nebraska SHPO Determination

Site Number(s):

If selected, the project may proceed as planned

- □ No Historic Properties Affected (NP)
- □ No Effect to Historic Properties (NO EFF)
- □ No Adverse Effect to Historic Properties (NAE)

If selected, additional consultation with NESHPO is required

- □ More Information (MI)*
- □ No Adverse Effect to Historic Properties with Conditions (NAEWC)
- □ Adverse Effect to Historic Properties (AE)

Date: _____

Section 106 Review & Compliance Coordinator
State Historic Preservation Office, Nebraska State Historical Society

***If NESHPO determines that more information is required to complete the Section 106 Review, the allowed 30-day review period resets on the date that NESHPO receives all requested information.**

IV. PROJECT DESCRIPTION

A. GROUND DISTURBING ACTIVITIES

NOTE: Ground disturbing activities can include, but are not limited to excavation, trenching, grading, slating, and/or trenching.

1. Does this project involve ground disturbing activities? ○ YES ◉ NO (skip to IV. B. 1.) ○ DO NOT KNOW

2. Please describe the nature of the proposed ground disturbing activities involved as well as previous and current land use, conditions, and/or ground disturbances. If the extent of the proposed ground disturbing activities involved in this undertaking is not yet known, please include as much preliminary information as possible.

B. NON-GROUND DISTURBING PROJECT ACTIVITIES

1. Please describe all proposed project activities that do not result in ground disturbance in as much detail as possible.

Prime Air is seeking authorization to conduct commercial package deliveries using drones at 1 location near the greater Omaha, NE metro area. Prime Air intends to introduce its drone delivery capabilities in 2026 and has requested the FAA to authorize operation of its MK30 drone to provide delivery within a 7.5 mile-radius APE.

V. IDENTIFICATION OF HISTORIC PROPERTIES: ARCHEOLOGY

A. Has a cultural resources survey/inventory been conducted within the APE? (if yes, provide the title, date, and author in the space below)

no

B. Is the landowner aware of any archeological resources identified within the APE? (if yes, please describe in the space below)

no

VI. IDENTIFICATION OF HISTORIC PROPERTIES: STANDING STRUCTURES

A. Are there any buildings or structures 50 years or older within the area of potential effect (APE)? ◉ YES ○ NO ○ DO NOT KNOW

B. To the best of your knowledge, is/are the structure(s) any of the following?

- ▣ Listed Individually in the National Register
- ☐ Designated Local Landmark (or with a Local Landmark Historic District)
- ▣ Listed within a National Register Historic District

C. List all buildings and structures within the APE that are older than 50 years. Please include the address/location, *original construction date*, and *dates of additions or major repair*. Please attach photographs of each building/structure within the APE older than 50 years.

Please see provided Cover Letter Attachments.

VII. PRELIMINARY ASSESSMENT OF EFFECTS (REQUIRED)

A. Based on the information submitted, are there historic properties present within the APE? ◉ YES ○ NO ○ DO NOT KNOW

B. Please select one preliminary determination based on the information included in this submission.

No Adverse Effect(s) to Historic Properties (NAE)

C. Please justify your assessment of effects in the space below. If adverse effects are anticipated, please use this space to identify potential mitigation actions.

Please see Cover Letter for more information.

NEBRASKA STATE HISTORIC PRESERVATION OFFICE (NESHPO)

Section 106 Determinations of Effect

(NP) **No Historic Properties Affected**
No historic properties are present within the APE, or a cultural resource is identified within the APE as the result of field inventory, but it is not eligible for listing in the National Register of Historic Places (NRHP). If a cultural resource is not deemed eligible for listing in the NRHP, it is not considered a historic property, as defined by 36 CFR Part § 800.16 (l)(1).

(NO EFF) **Historic Properties Present but No Effect**
Cultural resources listed or eligible for listing in the NRHP are identified within the APE as a result of field inventory, but the NESHPO has determined that the undertaking will have no effect on them.

(NAE) **No Adverse Effect(s)**
When historic properties are present within the APE, but activities associated with the undertaking are determined by the NESHPO to have no adverse effect on the significance or integrity of the historic property.

(NAEWC) **No Adverse Effect with Conditions**
When historic properties are present within the APE, but the activities associated with the undertaking can be modified, or the conditions can be imposed to avoid adverse effects through consultation with the NESHPO.

(AE) **Adverse Effect(s)**
When it is determined that an undertaking cannot be modified to avoid adverse effects to historic properties, the federal agency/designee shall notify the ACHP and other consulting parties to resolve adverse effects under 36 CFR Parts 800.6 and 800.7, as necessary.

SECTION 106 PROJECT REVIEW SUBMISSION CHECKLIST

- ☐ Completed NESHPO Section 106 Project Review Form
  - Include all contact information for the project's person of contact.
  - Include federal agency/designee assigned project number, if applicable.
  - Include project name, if applicable.

ATTACHMENTS

- ▣ Map(s) including:
  - APE boundaries (i.e., direct and visual)
  - North Arrow
  - Legend
  - Project Name and/or Project Number, if applicable
  - Aerial Maps are preferred
- ☐ Project Plans (if applicable)
  - Site Plans (e.g., engineering, architectural)
  - Historic Drawings, if available
  - Elevations (existing and proposed)
- ☐ Archeological Survey Report and/or Site Form(s), if applicable
- ☐ Digital Photographs
  - May be submitted individually or in a pdf with one photograph per page.
  - Must include captions with the following information, as relevant: orientation of the photo, street address/location of view, and a brief description of the photograph subject (e.g., residential dwelling, telecommunications tower).
- ☐ Photo Key
  - Photos must be labeled numerically (e.g., Figure 1, Figure 2)
  - Photo key must indicate the direction view for all photographs.
- ▣ Preliminary determination and justification

For additional project submission questions, please contact the Nebraska State Historic Preservation Office at NSHS.S106@nebraska.gov.

Nebraska State HISTORICAL SOCIETY

HP#2605-043-01

May 20th, 2026

Federal Aviation Administration
VIA EMAIL

RE: HP# 2604-043-01, Commercial Drone Delivery Operations Around Omaha, 14248 Highway 370, Omaha, NE

To Whom it May Concern,

Thank you for submitting information for the above-referenced project for the Nebraska State Historic Preservation Office (NESHPO) to review and comment on. Our comment on this project and its potential to affect historic properties is required by Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations 36 CFR Part 800.

Based on the information provided, the proposed undertaking is unlikely to adversely affect any cultural resources listed in the National Register of Historic Places or eligible for such a listing. A determination that there will be **no adverse effects to historic properties (NAE)** is appropriate for this undertaking, and the project may proceed as planned. Should any changes to the project be made, please notify NESHPO of the changes before further project planning continues.

Please retain this correspondence and your documented finding to show compliance with Section 106 of the National Historic Preservation Act, as amended. If you have any questions, please contact me at haylee.rose@nebraska.gov.

Sincerely,

Haylee Rose
Section 106 Review and Compliance Coordinator for Standing Structures

1500 R Street
Lincoln, NE, 68508-1651
https://history.nebraska.gov