

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

State Historic Preservation Officer  
Compliance & Review Section  
Division of Historical Resources  
Florida Department of State  
500 South Bronough Street – 4th Floor  
Tallahassee, Florida 32399-0250

Via electronic submission to: [CompliancePermits@dos.fl.gov](mailto:CompliancePermits@dos.fl.gov)

**Re: Concurrence with No Adverse Effect to Historic Properties for Commercial Drone Delivery Operations in Florida**

The Federal Aviation Administration (FAA) is currently evaluating a proposal from Amazon.com Services, doing business as Prime Air, to introduce drone package delivery operations at six locations in the state of Florida. 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)). The purpose of this letter is to coordinate with the State Historic Preservation Officer (SHPO) and request the SHPO's concurrence on the definitions of each Area of Potential Effects (APE) and the agency's finding of *no adverse effects* associated with the Proposed Undertaking.

**Proposed Undertaking**

Prime Air is seeking authorization to conduct commercial package deliveries using drones at six locations in the state of Florida. Prime Air intends to introduce its drone delivery capabilities in 2025 and has requested the FAA to authorize the operation of its MK30 drone, so it can provide drone package delivery services across each operating area. Prime Air projects flying up to 1,000 MK30 drone flights per operating day from each of the six Prime Air Drone Delivery Centers (PADDCs), with each flight 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 flights per day as consumer demand increases over time. Drone flights could be conducted up to 365 days a year between 7 A.M. and 10 P.M.

Unmanned Aircraft

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

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.

#### *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.

#### *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 to 377 feet AGL). The delivery phase of flight would last approximately one minute.

#### *En Route Inbound*

The MK30 drone continues to fly at an altitude of about 345 feet AGL with a speed of 67 mph towards the PADDC.

#### *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 descends over its assigned landing pad and lands on the pad.

### 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 dB (at 20 feet), 92.1 dB (at 25 feet), and 91.8 dB (at 20 feet), respectively. 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 is at an altitude of 200 feet AGL and flying at approximately 67 mph.

The drone is generally expected to fly the same outbound flight path between a PADDC and the delivery point and inbound flight path back to the PADDC. While the average daily deliveries from any PADCC is not expected to exceed 1,000, the number of daily overflights will likely be dispersed because the PADCC is centrally located in the delivery area, and delivery locations would be distributed throughout the proposed operating area. A conservative estimate for the maximum number of overflights over any one location is not expected to exceed half of the projected daily deliveries, or 500 deliveries. Since each delivery involves both an outbound and inbound flight path, this equates to 1,000 daily overflights. The resulting Day-Night Average Sound Level (DNL) could reach DNL 43 dB in any location within the APE.

Due to the inherent uncertainty of the exact delivery site locations, the noise analysis developed a minimum and maximum representative distribution of deliveries in the APE. The noise analysis conservatively assumes the minimum and maximum distribution of average daily deliveries that could occur at a single delivery location, which ranges from 1 to 4 deliveries per operating day. The noise for delivery operations also includes outbound and inbound en route overflights at the typical operating altitudes of 200 and 345 feet AGL, respectively, for operations associated with deliveries to other locations. The outbound en route altitude 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 AGL back to the PADDC, with the resulting DNL of 52.5 at 16.4 feet.

### **Area of Potential Effects**

In accordance with 36 CFR § 800.4(a)(1), the FAA has defined each APE in consideration of the undertaking's potential direct and indirect effects. The six proposed APEs are the drone operating areas associated with each PADDC, as outlined in red in **Attachment C**. Each APE encompasses approximately 175 square miles and a 7.5-mile drone operating radius around the PADDC.

### **Identification of Historic Properties**

The proposed undertaking does not have the potential to affect below ground or archaeological resources because it does not include ground disturbance, but may include visual and auditory effects. Therefore, the FAA focused its identification efforts on above-ground historic properties. According to the National Park Service's online database of the National Register of Historic Places (NRHP), there are 102 historic resources listed in the National Register and five National Register-eligible resources located in the six APEs (see **Attachment D**). Additional properties in the proposed APEs may be otherwise recognized for historical significance by the SHPO. Most of the historic properties in the proposed APEs are residences and businesses but also include government buildings and schools. Most of the historic properties are included on the NRHP because of their historic architectural features.

### **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 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.

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 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.

The FAA has not identified any properties in the proposed APEs that would be affected by the drone's sound levels or visual effects, which are not anticipated to be significant at any locations along the drone's flight path, including delivery locations. Therefore, *the FAA has made a finding of no adverse effects*.

### **Conclusion**

The FAA requests your concurrence on the definition of the proposed APEs and with the FAA's finding of *no adverse effects* from the Proposed Undertaking. In accordance with Section 106 of the NHPA, the FAA has also initiated consultation with the federally recognized Native American Tribes that may have a potential interest in the Proposed Undertaking, as listed in **Attachment E**.

Your response within the next 30 days will greatly assist us in our environmental review process. In the event that you would like to consult with the FAA about the determination, please contact Christopher Hurst via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov).

Sincerely,

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 – Listed and Eligible NRHP Resources

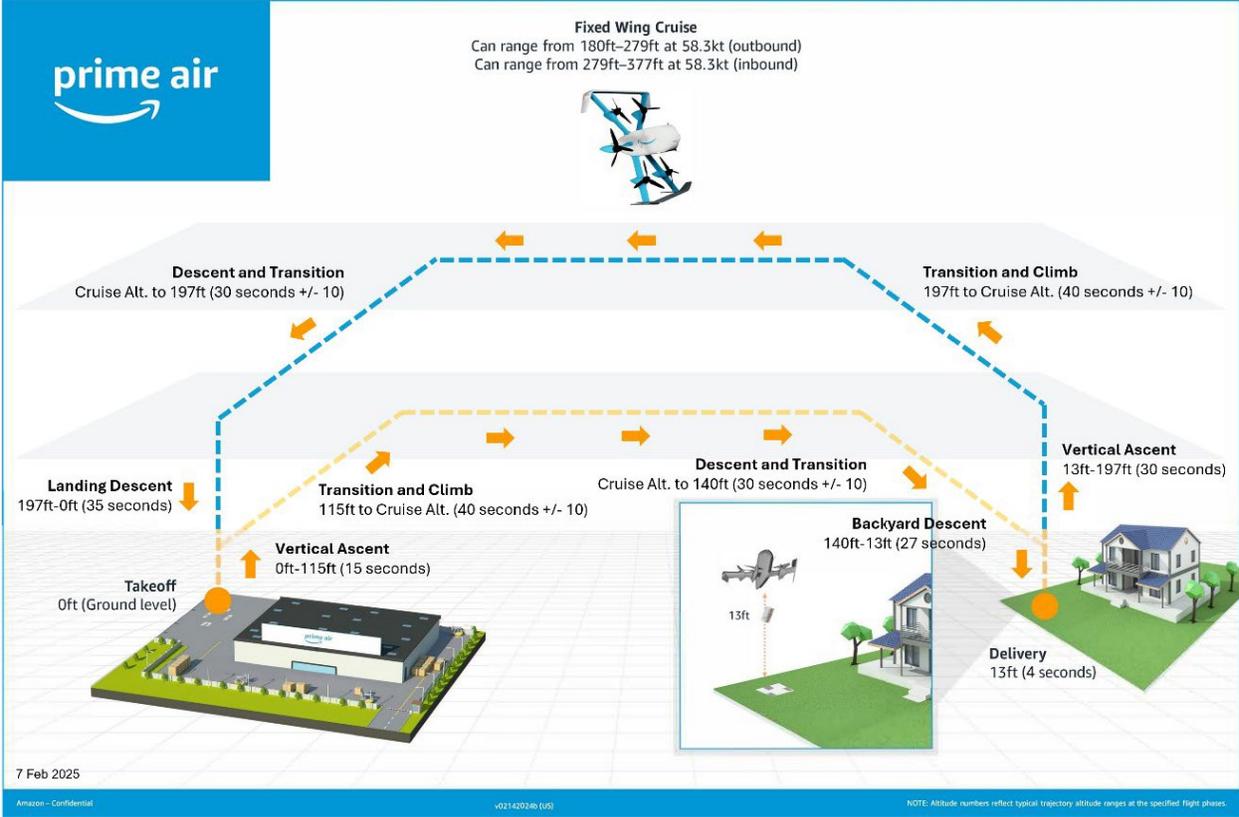
Attachment E – Consulted Parties

**Attachment A**  
**Amazon Prime Air MK30 Drone**



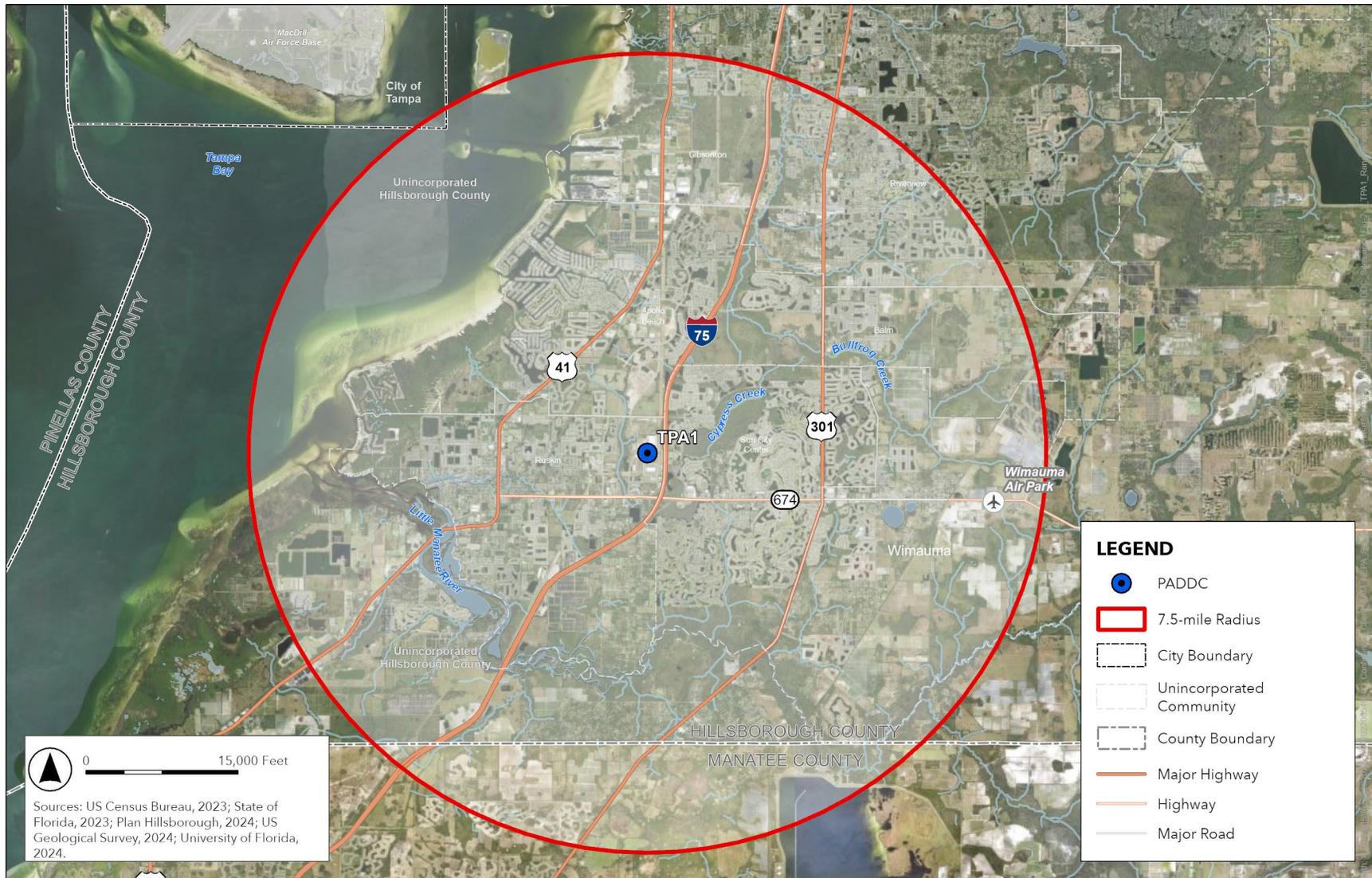
**Amazon Prime Air MK30 Drone**

**Attachment B**  
**MK30 Drone Flight Profile**



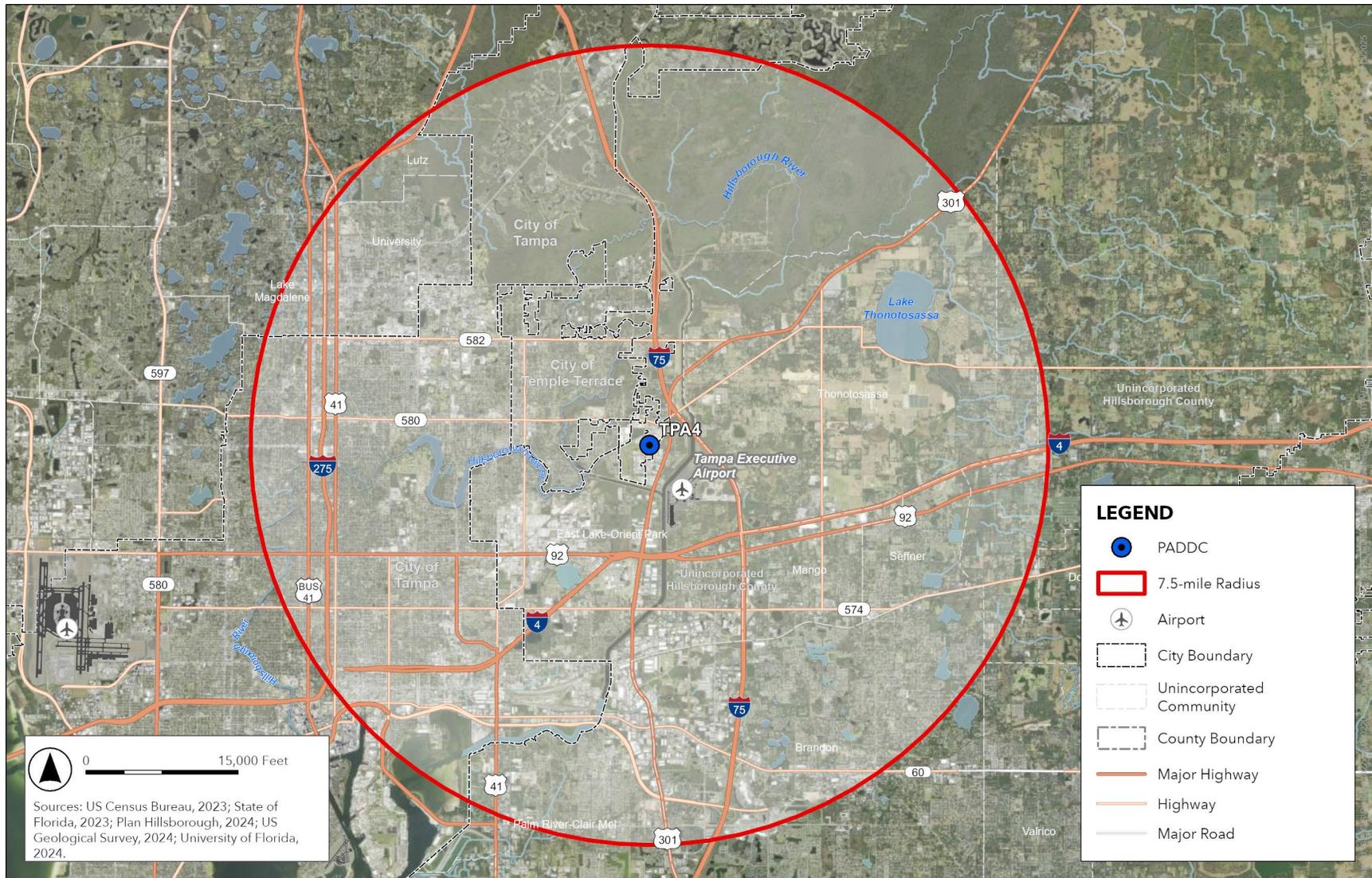
**MK30 Drone Flight Profile**

**Attachment C**  
**Proposed Areas of Potential Effects**



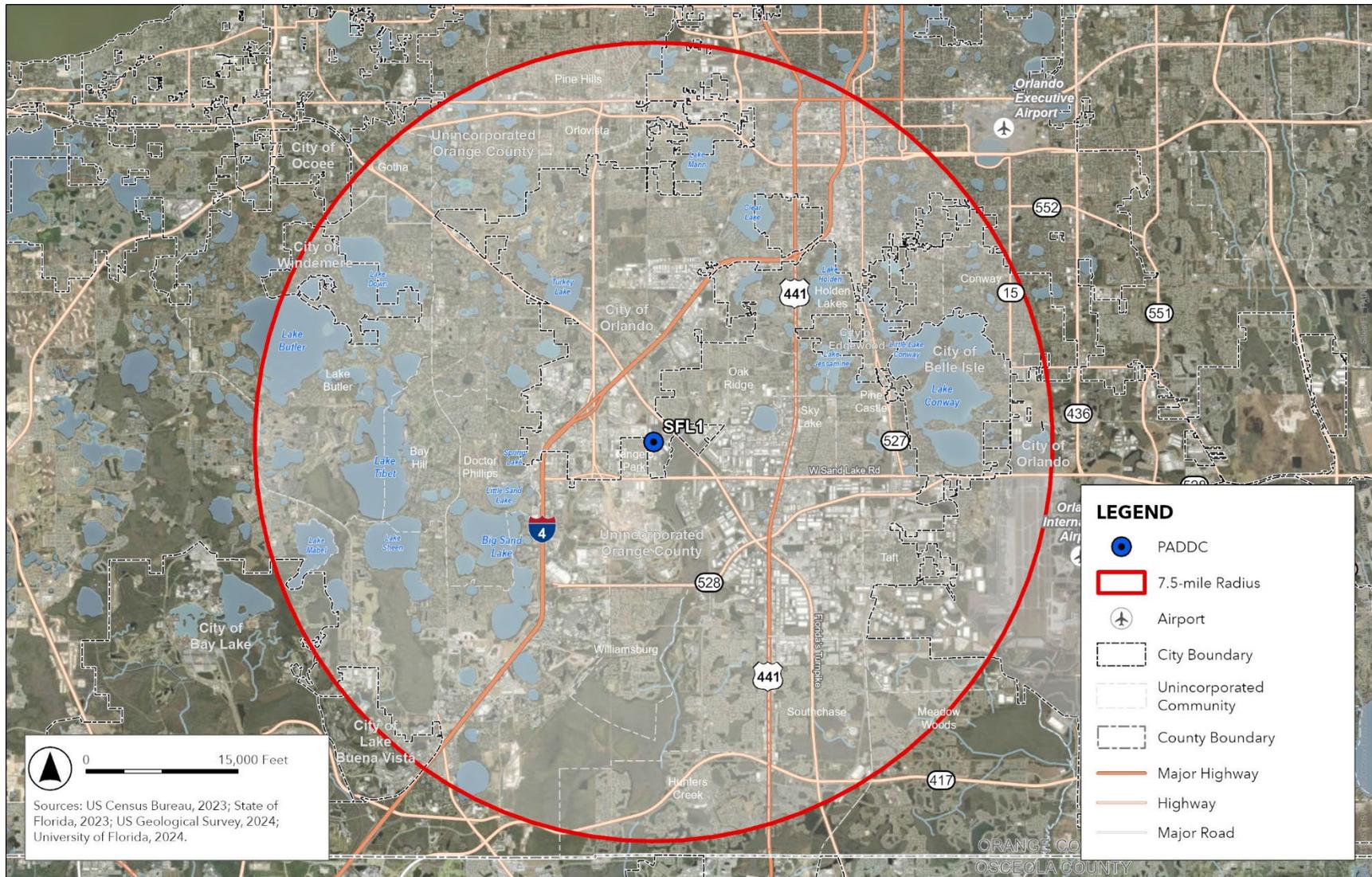
SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; Plan Hillsborough, 2024; US Geological Survey, 2024; University of Florida, 2024.

### Proposed TPA1 PADD Area of Potential Effects



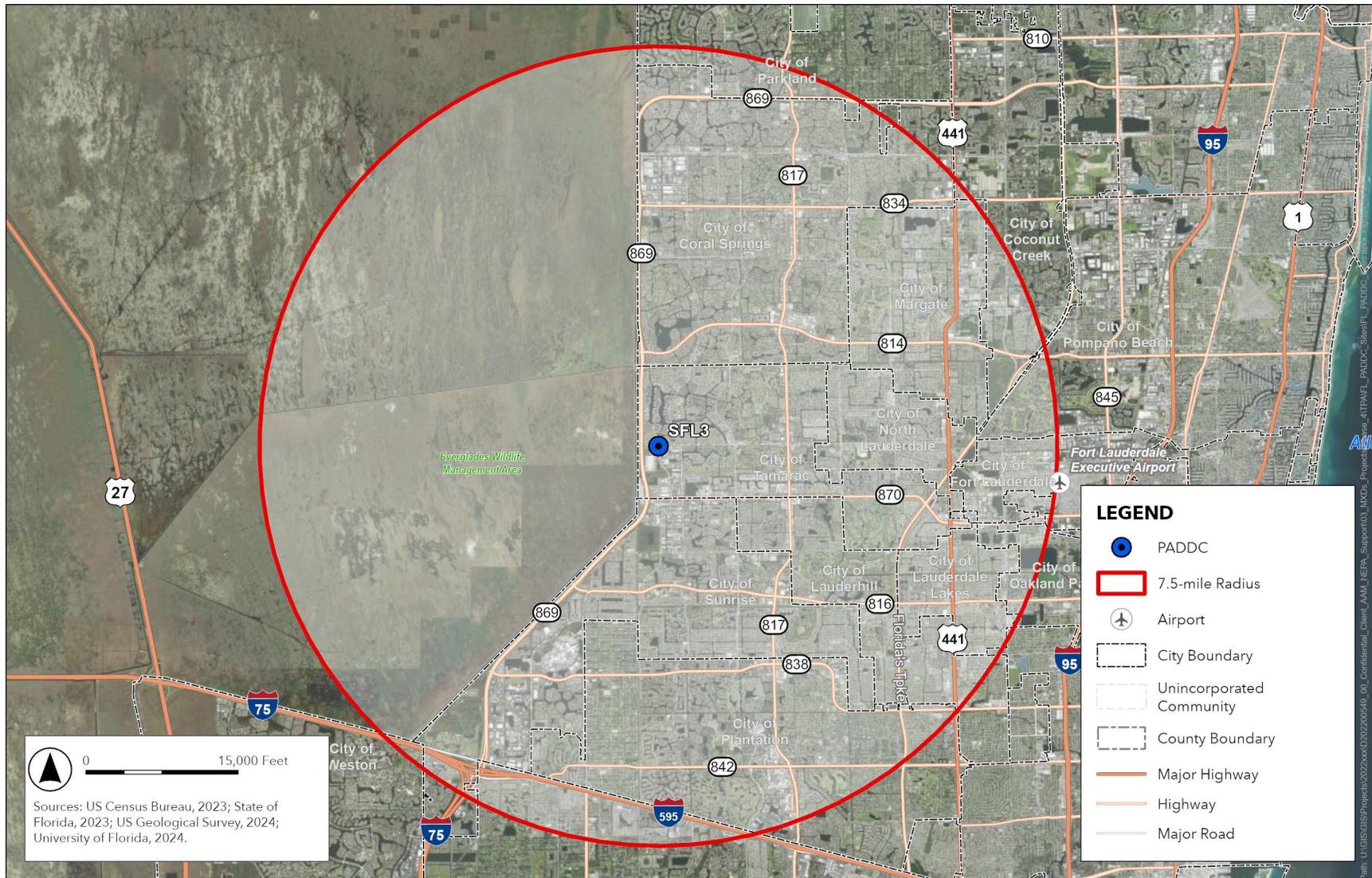
SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; Plan Hillsborough, 2024; US Geological Survey, 2024; University of Florida, 2024.

### Proposed TPA4 PADD Area of Potential Effects



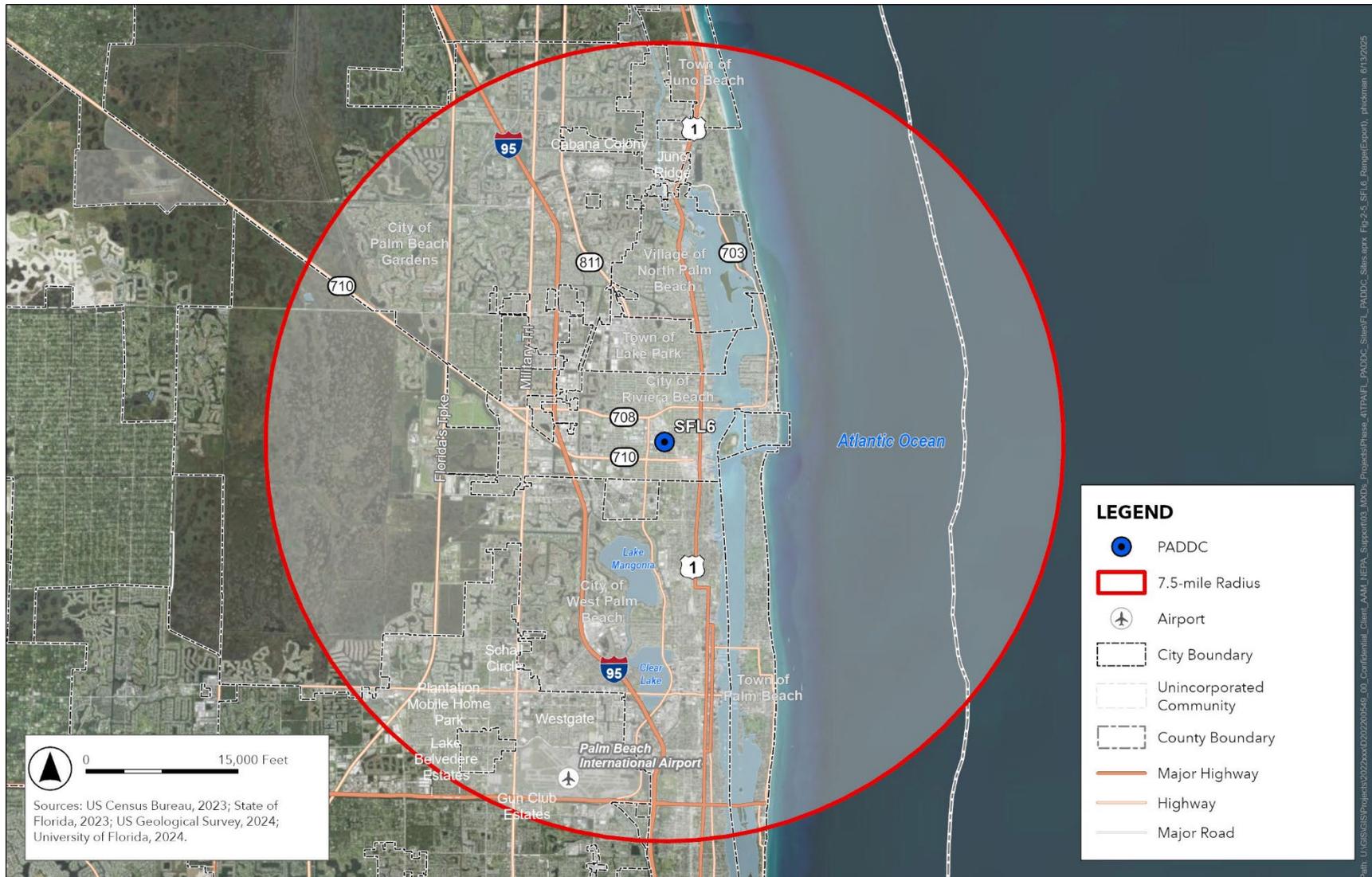
SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; US Geological Survey, 2024; University of Florida, 2024.

### Proposed SFL1 PADD Area of Potential Effects



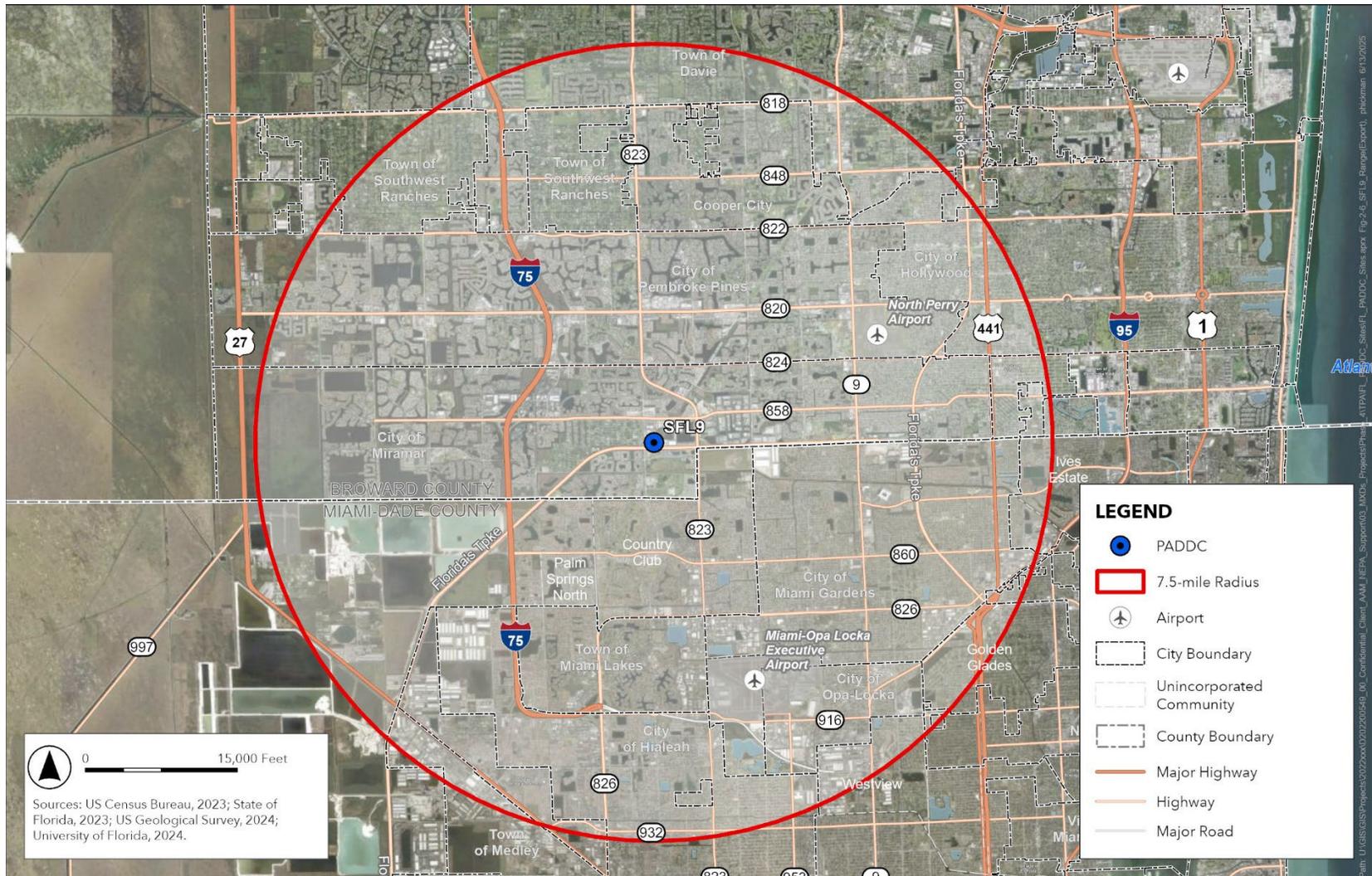
SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; US Geological Survey, 2024; University of Florida, 2024.

### Proposed SFL3 PADDCC Area of Potential Effects



SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; US Geological Survey, 2024; University of Florida, 2024.

### Proposed SFL6 PADD Area of Potential Effects



SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; US Geological Survey, 2024; University of Florida, 2024.

### Proposed SFL9 PADD Area of Potential Effects

**Attachment D**  
**Listed and Eligible NHRP Resources**

**HISTORIC RESOURCES IN THE APES**

<b>Resource Name</b>	<b>Address/Location</b>	<b>PADDC</b>	<b>Significance</b>
Lake Eola Heights Historic District	Roughly bounded by Hillcrest St., N. Hyer Ave., Ridgewood St. and N. Magnolia Ave.	SFL1	NRHP Listed
Griffin Park Historic District	Roughly bounded by Avondale and S. Division Aves., Carter St., and I-4	SFL1	NRHP Listed
Lake Adair-Lake Concord Historic District	Roughly Golfview St., Edgewater Ct., Alameda St., & Peachtree Rd.	SFL1	NRHP Listed
Holden-Parramore Historic District	Bounded by W. Church St., S. Division Ave., Long St., McFall Ave., & S. Parramore Av.	SFL1	NRHP Listed
Tinker Field	1610 W. Church St.	SFL1	NRHP Listed
Huttig, John N., Estate	435 Peachtree Rd.	SFL1	NRHP Listed
Rogers Building	37-39 S. Magnolia Ave.	SFL1	NRHP Listed
Bridges, J.J., House	704 S. Kuhl Ave.	SFL1	NRHP Listed
First Church of Christ Scientist	24 N. Rosalind Ave.	SFL1	NRHP Listed
Old Orlando Railroad Depot	Depot Pl. and W. Church St.	SFL1	NRHP Listed
Phillips, Dr. P., House	135 Lucerne Circle, NE.	SFL1	NRHP Listed
Tinker Building	16--18 W. Pine St.	SFL1	NRHP Listed
Windermere Town Hall	520 Main St.	SFL1	NRHP Listed
Palmer, Cal, Memorial Building	502 Main St.	SFL1	NRHP Listed
Well'sbuilt Hotel	511 W. South St.	SFL1	NRHP Listed
Palm Cottage Gardens	2267 Hempel Ave.	SFL1	NRHP Listed
1890 Windermere School	113 W. Seventh Ave.	SFL1	NRHP Listed
Orlando Utilities Commission Administration Building	500 S. Orange St.	SFL1	NRHP Listed
Downtown Historic District	Roughly bounded by Jefferson St., Rosaland Ave., S. St., S. Bryan Ave., W. Central Blvd., & N. Gertrude Ave.	SFL1	NRHP Eligible
Dixie Water Plant	1500 S. US 441	SFL3	NRHP Eligible
Lake Cherokee Historic District	Roughly bounded by E-W Expressway, S. Summerlin Ave., Lake Davis, E. Core, Euclid, S. Delaney & S. Orange Ave.	SFL3	NRHP Eligible
Flamingo Park Historic Residential District	Roughly bounded by Park Place, Parker Ave., Beleveder Rd., and Florida Ave.	SFL6	NRHP Listed
Northboro Park Historic District	Bounded by 40th N, Flagler Dr., 36th St. and Broadway	SFL6	NRHP Listed
Vedado Historic District	Roughly bounded Merrill Ave, Southern Blvd, Parker Ave & Paseo Morella	SFL6	NRHP Listed
Prospect Park-Southland Park Historic District	Bounded by Lake Worth, S Dixie HWY, Monceaux Rd, Monroe Dr	SFL6	NRHP Listed
Northwest Historic District	Roughly bounded by Tamarind Ave., Eleventh St., Rosemary Ave. and Third St.	SFL6	NRHP Listed
Northwood, Old, Historic District	Roughly bounded by Broadway, N. Dixie Hwy. and 26th and 35th Sts.	SFL6	NRHP Listed

<b>Resource Name</b>	<b>Address/Location</b>	<b>PADDC</b>	<b>Significance</b>
El Cid Historic District	Roughly bounded by Flamingo Dr., S. Flagler Dr., Dyer Rd. and S. Dixie Hwy.	SFL6	NRHP Listed
Grandview Heights Historic District	Roughly bounded by Park Pl., Alabama Ave., M St., and S. Lake Ave.	SFL6	NRHP Listed
Mango Promenade Historic District	Roughly bounded by S. Dixie Hwy., Austin Ln., Coconut Ln., and Cranesnest Way	SFL6	NRHP Listed
Central Park Historic District	Roughly along FL 805 and S. Olive Ave. from Monroe Dr. to Southern Blvd.	SFL6	NRHP Listed
Breakers Hotel Complex	S. County Rd.	SFL6	NRHP Listed
Hurricane of 1928 African American Mass Burial Site	Jct. of 25th St. and Tamarind Ave.	SFL6	NRHP Listed
Via Mizner	337-339 Worth Ave.	SFL6	NRHP Listed
Clematis Street Historic Commercial District	500 Blk. of Clematis St.	SFL6	NRHP Listed
Royal Poinciana Way Historic District	Bounded by 207-283 Royal Poinciana Way, 95-118 N. Cty. Rd. 184-280	SFL6	NRHP Listed
US Post Office	95 N. County Rd.	SFL6	NRHP Listed
Warden, William Gray, House	112 Seminole Ave.	SFL6	NRHP Listed
Mickens House	801 4th St.	SFL6	NRHP Listed
Palm Beach Winter Club	U.S. 1	SFL6	NRHP Listed
Flagler, Henry Morrison, House; Whitehall	Whitehall Way	SFL6	NRHP Listed
Seaboard Coastline Railroad Passenger Station	Tamarind Ave. at Datura St.	SFL6	NRHP Listed
Paramount Theatre Building	145 N. County Rd.	SFL6	NRHP Listed
Kelsey City City Hall	535 Park Ave.	SFL6	NRHP Listed
Palm Beach Daily News Building	204 Brazilian Ave.	SFL6	NRHP Listed
Seaboard Airline Railroad Station	1525 W. Atlantic Ave.	SFL6	NRHP Listed
Vineta Hotel	363 Cocoanut Row	SFL6	NRHP Listed
Norton House	253 Barcelona Rd.	SFL6	NRHP Listed
Old Palm Beach Junior College Building	813 Gardenia Ave.	SFL6	NRHP Listed
West Palm Beach National Guard Armory, Old	1703 S. Lake Ave.	SFL6	NRHP Listed
Palm Beach Mercantile Company	206 Clematis St.	SFL6	NRHP Listed
Hatch's Department Store	301--307 Clematis St.	SFL6	NRHP Listed
Rice, Clifton, House	714 Claremore Dr.	SFL6	NRHP Listed
Comeau Building	319 Clematis St.	SFL6	NRHP Listed
American National Bank Building	114 S. Olive Ave.	SFL6	NRHP Listed
Guaranty Building	120 S. Olive Ave.	SFL6	NRHP Listed
Van Valkenburg, Grant House	213 Rosemary Ave.	SFL6	NRHP Listed
Ferndix Building	401 Fern St.	SFL6	NRHP Listed

<b>Resource Name</b>	<b>Address/Location</b>	<b>PADDC</b>	<b>Significance</b>
Comeau, Alfred J., House	701 Flamingo Dr.	SFL6	NRHP Listed
Pine Ridge Hospital	1401 Division Ave.	SFL6	NRHP Listed
Professional Building	310 S. Dixie Hwy.	SFL6	NRHP Listed
Palm Beach Town Hall	360 South County Rd.	SFL6	NRHP Listed
Palm Beach Hotel	235-251 Sunrise Ave	SFL6	NRHP Listed
Mar-A-Lago National Historic Landmark	1100 S. Ocean Blvd.	SFL6	NRHP Listed
Vedado Historic District	Roughly bounded Merrill Ave, Southern Blvd, Parker Ave, and Paseo Morella	SFL6	NRHP Eligible
Sunshine State Arch	Jct. of NW. 13th Ave. & NW. 167th St.	SFL9	NRHP Listed
King Trunk Factory and Showroom	951 Superior St.	SFL9	NRHP Listed
Long House	613 Sharar Ave.	SFL9	NRHP Listed
Root Building	111 Perviz Ave.	SFL9	NRHP Listed
Tinsman House	1110 Peri St.	SFL9	NRHP Listed
Tooker House	811 Dunad Ave.	SFL9	NRHP Listed
Wheeler House	1035 Dunad Ave.	SFL9	NRHP Listed
Baird House	401 Dunad Ave.	SFL9	NRHP Listed
Cravero House	1011 Sharar Ave.	SFL9	NRHP Listed
Crouse House	1156 Peri St.	SFL9	NRHP Listed
Griffiths House	826 Superior St.	SFL9	NRHP Listed
Haislip House	1141 Jann Ave.	SFL9	NRHP Listed
Helm Stores and Apartments	1217 Sharazad Blvd.	SFL9	NRHP Listed
Helms House	721 Sharar Ave.	SFL9	NRHP Listed
Higgins Duplex	1210-1212 Sesame St.	SFL9	NRHP Listed
Taber Duplex	1214--1216 Sesame St.	SFL9	NRHP Listed
Etheredge House	915 Sharar Ave.	SFL9	NRHP Listed
Hurt, Harry, Building	490 Ali-Baba Ave.	SFL9	NRHP Listed
Opa-Locka Company Administration Building	777 Sharazad Blvd.	SFL9	NRHP Listed
Opa-Locka Railroad Station	490 Ali Baba Ave.	SFL9	NRHP Listed
Davie Woman's Club	6551 SW. 45th St.	SFL9	NRHP Listed
Miller, George McA., House	508 Tamiami Trail	TPA1	NRHP Listed
Dickman, A.P., House	120 Dickman Dr., SE	TPA1	NRHP Listed
Lamb, A.M., House	2410 W Shell Rd.	TPA1	NRHP Listed
Temple Terrace Golf Course	200 Inverness Ave.	TPA4	NRHP Listed
Ybor City Historic District	Roughly bounded by 6th Ave., 13th St., 10th Ave. and 22nd St., E. Broadway between 13th and 22nd Sts.	TPA4	NRHP Listed
Seminole Heights Residential District	Roughly bounded by Osborne, Florida, Hanna, and Cherokee Aves.	TPA4	NRHP Listed

<b>Resource Name</b>	<b>Address/Location</b>	<b>PADDC</b>	<b>Significance</b>
Tampa Heights Historic District	Roughly bounded by Adalee St., I-275, 7th Ave. and N. Tampa Ave.	TPA4	NRHP Listed
Hampton Terrace Historic District	Roughly bounded by Hanna Ave., 15th St., Hillsborough Ave., and Nebraska Ave.	TPA4	NRHP Listed
Palmetto Beach Historic District	Roughly bounded by Durham, 28th, Thrace, & 22nd Sts.	TPA4	NRHP Listed
Centro Asturiano	1913 Nebraska Ave.	TPA4	NRHP Listed
Circulo Cubano de Tampa	10th Ave. and 14th St.	TPA4	NRHP Listed
Ybor Factory Building	7th Ave. between 13th and 14th Sts.	TPA4	NRHP Listed
Curtis, William E., House	808 E. Curtis St.	TPA4	NRHP Listed
El Pasaje	14th St. and Palm Ave.	TPA4	NRHP Listed
El Centro Espanol de Tampa	1526-1536 E. Seventh Ave.	TPA4	NRHP Listed
Episcopal House of Prayer	2708 Central Ave.	TPA4	NRHP Listed
Old Tampa Children's Home	3302 N. Tampa Ave.	TPA4	NRHP Listed
Old People's Home	1203 E. 22nd Ave.	TPA4	NRHP Listed
Robles, Horace T., House	2604 E. Hanna Ave.	TPA4	NRHP Listed
Jackson, Capt. William Parker, House	800 E Lambright St	TPA4	NRHP Listed
Brandon House	401 W. Brandon Blvd.	TPA4	NRHP Eligible

SOURCE: National Parks Service, 2025.

**Attachment E**  
**Consulted Parties**

**Pursuant to Section 106 of the NHPA, additional parties consulted include the following:**

- Miccosukee Tribe of Indians of Florida
- Muscogee (Creek) Nation
- Poarch Band of Creek Indians
- Seminole Tribe of Florida
- Seminole Nation of Oklahoma



## FLORIDA DEPARTMENT of STATE

**RON DESANTIS**  
Governor

**CORD BYRD**  
Secretary of State

Chris Stahl, Coordinator  
Florida State Clearinghouse  
Florida Department of Environmental Protection  
3800 Commonwealth Blvd., M.S. 47  
Tallahassee, FL 32399-2400

September 11, 2025

DHR Project File No.: 2025-6349, Received by DHR: August 4, 2025  
Application No.: FL202508040539C  
Project: *Introduce Unmanned Aircraft (UA) Package Delivery Operations at Six Locations*

Dear Mr. Stahl:

The Florida State Historic Preservation Officer reviewed the referenced project for possible effects on historic properties listed, or eligible for listing, on the *National Register of Historic Places (NRHP)*. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in *36 CFR Part 800: Protection of Historic Properties*. This project is subject to compliance with the Federal Aviation Administration.

Based on the information provided, it is the opinion of this office that the proposed project will have no effect on historic properties.

If you have any questions, please contact Michael DuBose, Historic Preservationist, by email at [Michael.DuBose@dos.fl.gov](mailto:Michael.DuBose@dos.fl.gov) or by telephone at 850.245.6342.

Sincerely,

Alyssa Lotane  
Director, Division of Historical Resources  
& State Historic Preservation Officer

## **D-2 Tribal Consultation**





U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave., SW.  
Washington, DC 20591

Mr. Kevin Donaldson  
Environmental Specialist  
Miccosukee Tribe of Indians of Florida  
Tamiami Station  
PO Box 440021  
Miami, FL 33144

Transmitted via e-mail: [Kevind@miccosukeetribe.com](mailto:Kevind@miccosukeetribe.com)

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

Dear Mr. Donaldson,

The purpose of this letter is to initiate government-to-government consultation regarding a proposal under consideration by the Federal Aviation Administration (FAA) to authorize commercial Unmanned Aircraft Systems (UAS) operators to deliver goods to customers (referred to as package delivery) using unmanned aircraft (also referred to as drones) in accordance with 14 Code of Federal Regulations Part 135 (Part 135) in the state of Florida. The FAA is the lead federal agency for government-to-government consultation for the proposed project. Amazon.com Services LLC, doing business as Amazon Prime Air, is the proponent of the project. We wish to solicit your views regarding potential effects on tribal interests in the areas of operation.

The primary purpose of government-to-government consultation is to ensure that Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect the Tribes. This policy is provided in Federal Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*; Presidential Memorandum, *Uniform Standards for Tribal Consultation*; DOT Order 5301.1A, *Department of Transportation Tribal Consultation Policy and Procedures*; and FAA Order 1210.20, *American Indian and Alaska Native Tribal Consultation Policy and Procedures*.

**Consultation Initiation**

With this letter, the FAA is seeking input concerning any Tribal lands or sites of religious or cultural significance that may be affected by the proposed operation. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources. We are available to discuss the details of the proposed project with you.

**Proposed Activity Description**

The FAA is preparing an Environmental Assessment to assess the potential environmental impacts of commercial package delivery operations using drones in the state of Florida under Part 135. Since 2019, the FAA has been issuing air carrier certificates to UAS operators in accordance with Part 135 so that operators can conduct package delivery flights. Generally, these approvals are associated with issuing a new or amended Part 135 air carrier Operations Specifications as the operative approval. For your reference, the project description used for consultation under Section 106 is enclosed with this letter.

**Confidentiality**

We understand that you may have concerns about the confidentiality of information on areas or resources of traditional, religious, and cultural importance to your Tribe. We are available to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

**FAA Contact Information**

Your timely response within 30 days of receipt of this letter will greatly assist us in incorporating your concerns into our environmental review of the operation. In addition, we respectfully request your response in the event that the Miccosukee Tribe of Indians of Florida would like to consult with the FAA in a government-to-government relationship about this proposal. Please contact Christopher Hurst via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov) within 30 days of receipt of this letter to confirm your intent to participate in this government-to-government consultation.

Sincerely,

Enclosure:

Attachment A – Section 106 Consultation Package

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

**DEREK W  
HUFTY**

Digitally signed by  
DEREK W HUFTY  
Date: 2025.08.13  
10:18:08 -04'00'

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

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



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave., SW.  
Washington, DC 20591

Mr. Kevin Donaldson  
Environmental Specialist  
Miccosukee Tribe of Indians of Florida  
Tamiami Station  
PO Box 440021  
Miami, FL 33144

*Transmitted via e-mail: [Kevind@miccosukeetribe.com](mailto:Kevind@miccosukeetribe.com)*

Dear Mr. Donaldson,

The Federal Aviation Administration (FAA) is currently evaluating Amazon Prime Air's proposal to conduct commercial drone delivery operations in the state of Florida. Amazon Prime Air must obtain approval from the FAA prior to introducing operations and operating the MK30 drone. The FAA has determined that its proposed action, which would encompass all FAA approvals necessary to enable operations, is an undertaking as defined under the regulations implementing Section 106 of the National Historic Preservation Act (NHPA) (36 CFR § 800.16(y)). The purpose of this letter is to initiate Section 106 consultation with the Miccosukee Tribe of Indians of Florida and to solicit your views regarding potential effects on tribal interests in the areas of operation. The FAA has begun an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) to analyze the proposed action. FAA intends to complete consultation for Section 106 of the NHPA concurrently with the NEPA process.

### **Project Description**

Amazon Prime Air is proposing to transport consumer goods via drone delivery in the communities around the state of Florida by using the MK30 drone. The MK30 drone would take off from a Prime Air Drone Delivery Center (PADDC), which has already been constructed, and quickly rise to a cruising altitude of between 180 to 377 feet above ground level (AGL). The MK30 drone weighs approximately 87 pounds and can transport a small package up to about 5 pounds. The MK30 drone has an approximate 7.5-mile service radius. Once at the delivery site, the MK30 drone hovers in place at about 13 feet AGL and drops the package to the ground. Once the package has been delivered, the drone flies back to the PADDC at roughly the same altitude.

Amazon Prime Air is proposing up to 1,000 MK30 drone flights per day from six proposed PADDCs located in the state of Florida, with each flight taking a package to a customer delivery address before returning.

There is variability in the number of flights per day based on customer demand and weather conditions. Initially, Amazon Prime Air expects to fly much less than 1,000 flights per day from each PADDC and gradually ramp up to the proposed level as consumer demand increases. Drone flights are planned to occur up to 365 days a year, with operations being conducted between 7 A.M. and 10 P.M.

There are no ground disturbing activities associated with this proposed action.

**Area of Potential Effects**

In accordance with 36 CFR § 800.4(a)(1), the FAA has defined the Area of Potential Effects (APE) in consideration of the undertaking's potential direct and indirect effects. The proposed APEs have been coordinated with the Florida State Historic Preservation Office and would be located in the state of Florida, which generally include densely populated or congested regions. The enclosed map (see **Attachment A**) shows the proposed APEs in detail.

**Identification of Historic Properties**

The proposed undertaking does not have the potential to affect below ground or archeological resources because the undertaking does not include ground disturbance but could result in auditory or visual effects. Therefore, the FAA focused its identification efforts on above-ground historic properties.

**Consultation**

The FAA is now soliciting the opinion of the tribes concerning any tribal lands, or sites of religious or cultural significance that may be affected by the proposed operations areas. Your timely response within 30 days of receipt of this letter will greatly assist us in incorporating your concerns into our environmental review of the operation. If you have any questions or need additional information, please contact Christopher Hurst via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov) within 30 days of receipt of this letter.

Sincerely,

Enclosure:

Attachment A – Proposed Areas of Potential Effects

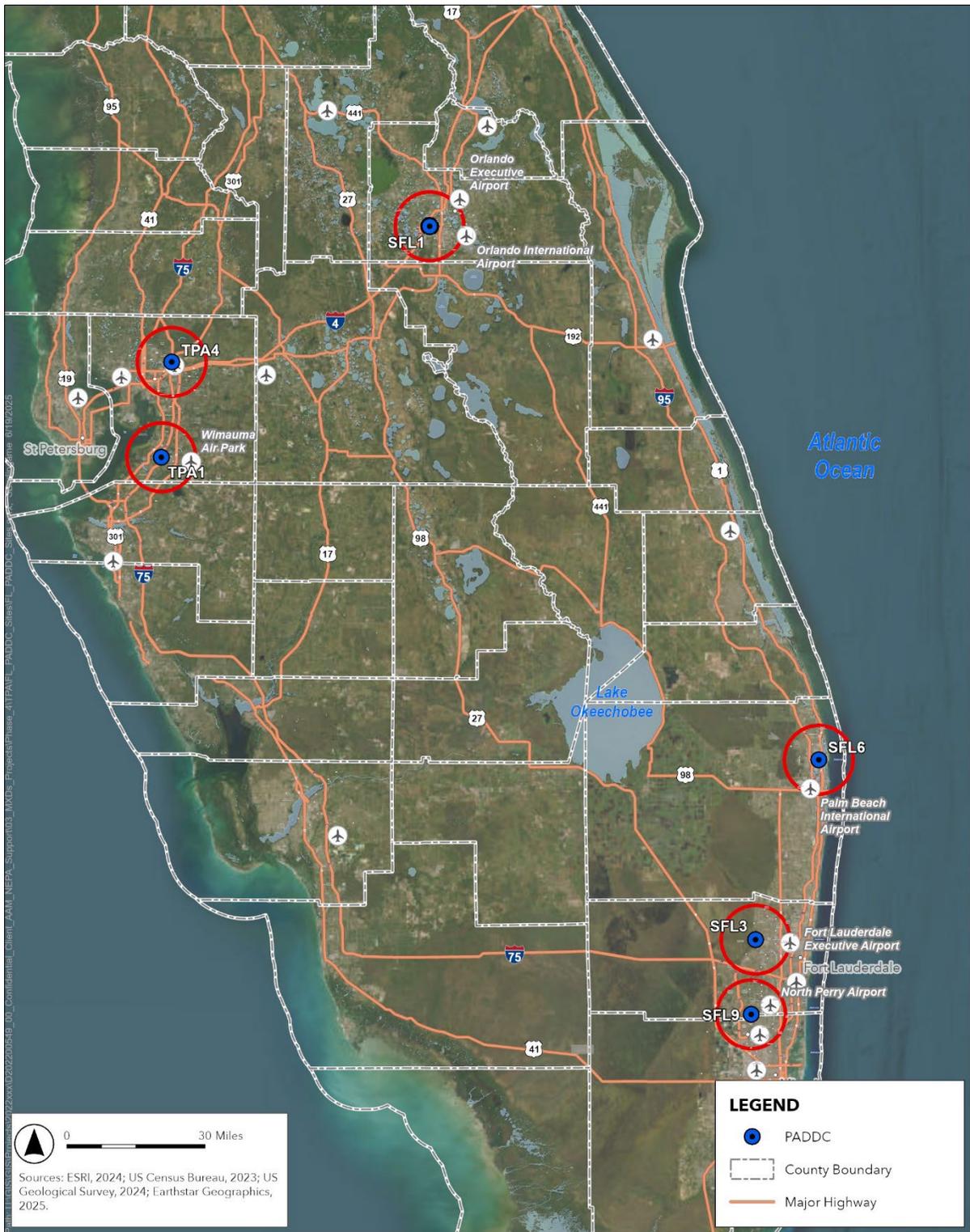
**RE: Invitation for Section 106 of the National Historic Preservation Act Tribal Consultation for Drone Package Delivery Operations in Florida**

**DEREK W  
HUFTY**

 Digitally signed by DEREK W  
HUFTY  
Date: 2025.08.13 10:30:15  
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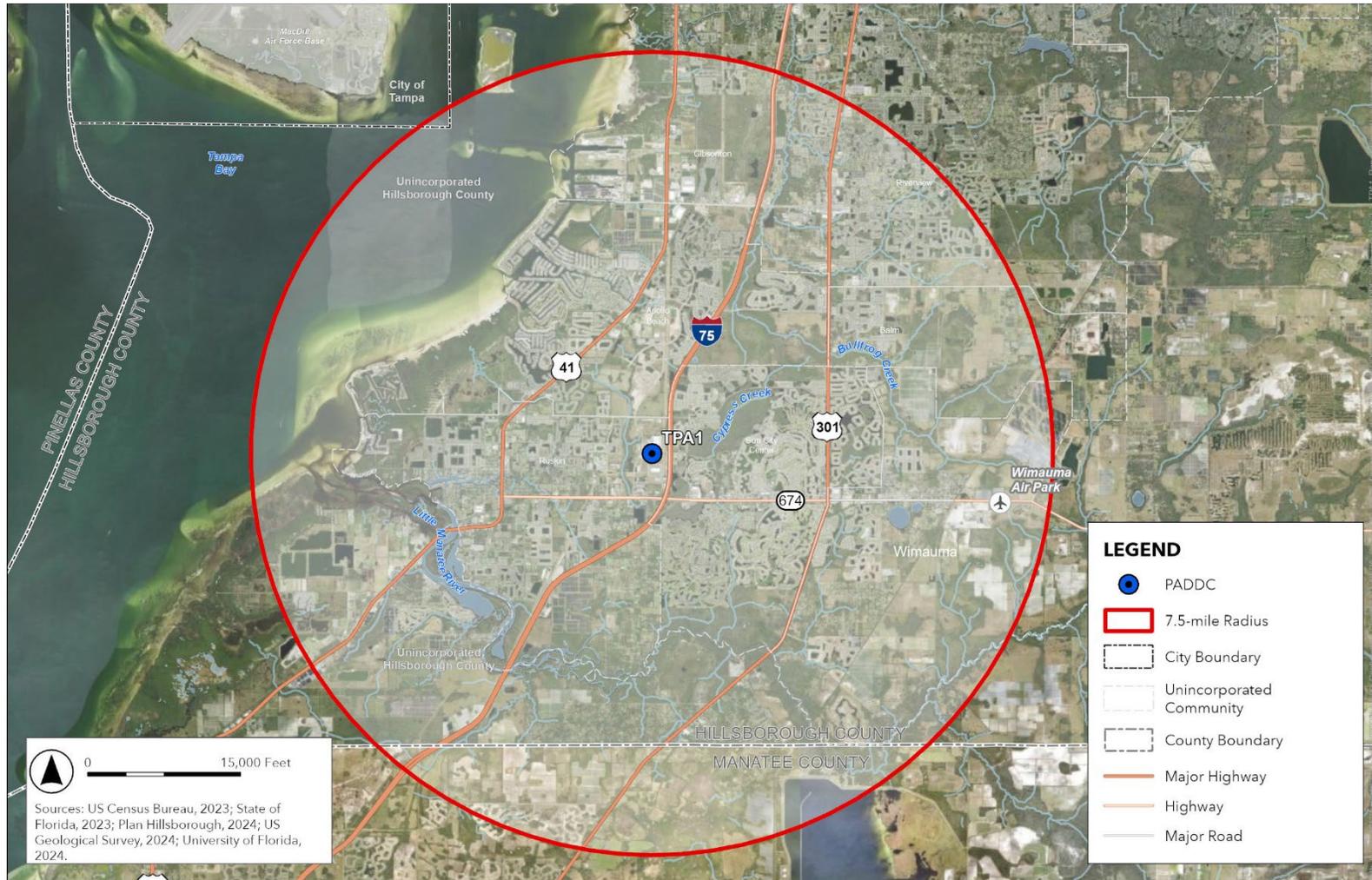
Derek Hufty  
Manager, General Aviation and Commercial Branch (AFS-750)  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service

**Attachment A**  
**Proposed Areas of Potential Effects**



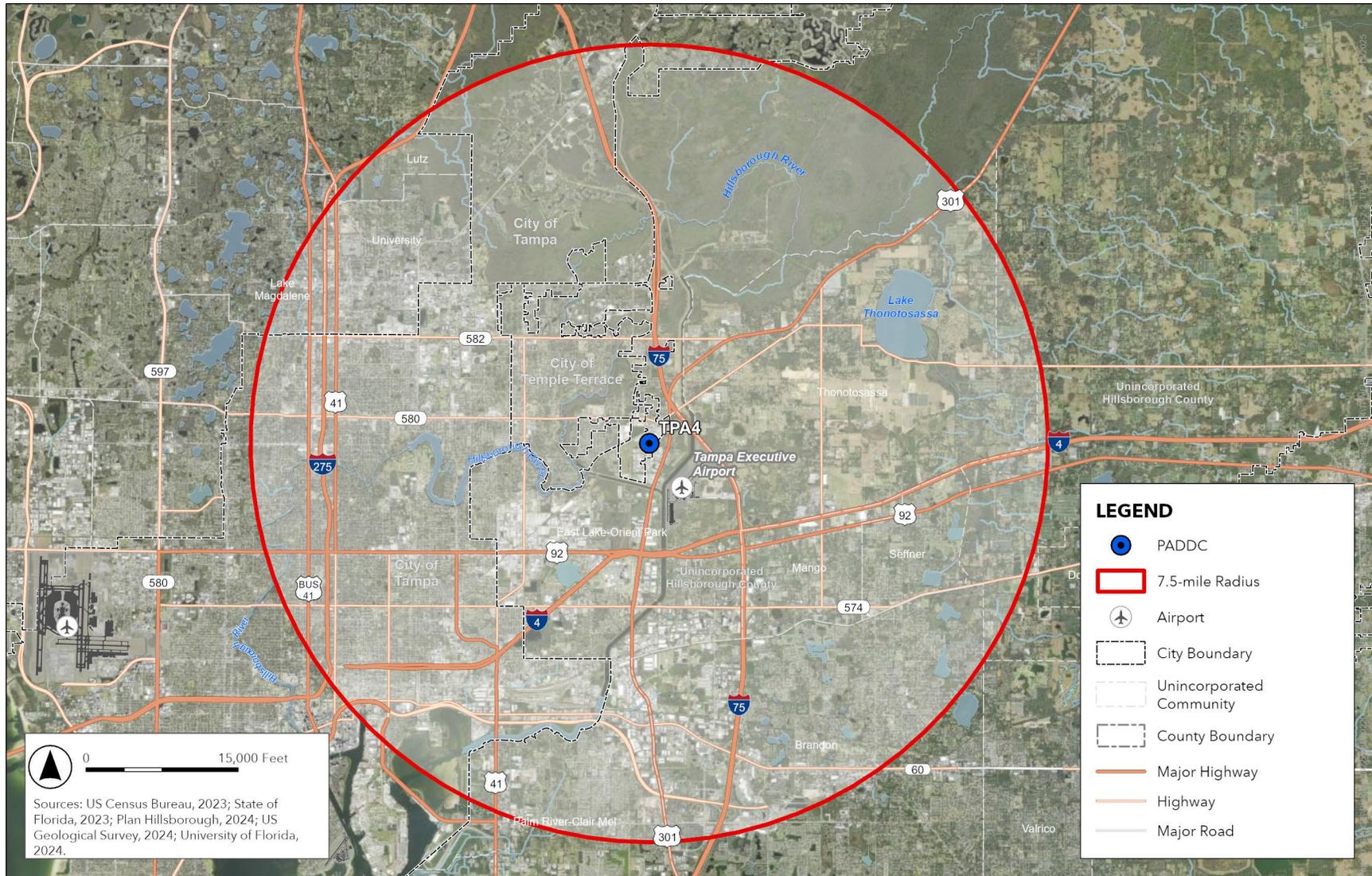
SOURCE: ESA, 2025; ESRI, 2024; US Census Bureau, 2023; US Geological Survey, 2024; Earthstar Geographics, 2025.

**Figure 1**  
Proposed Areas of Potential Effects – All PADDs



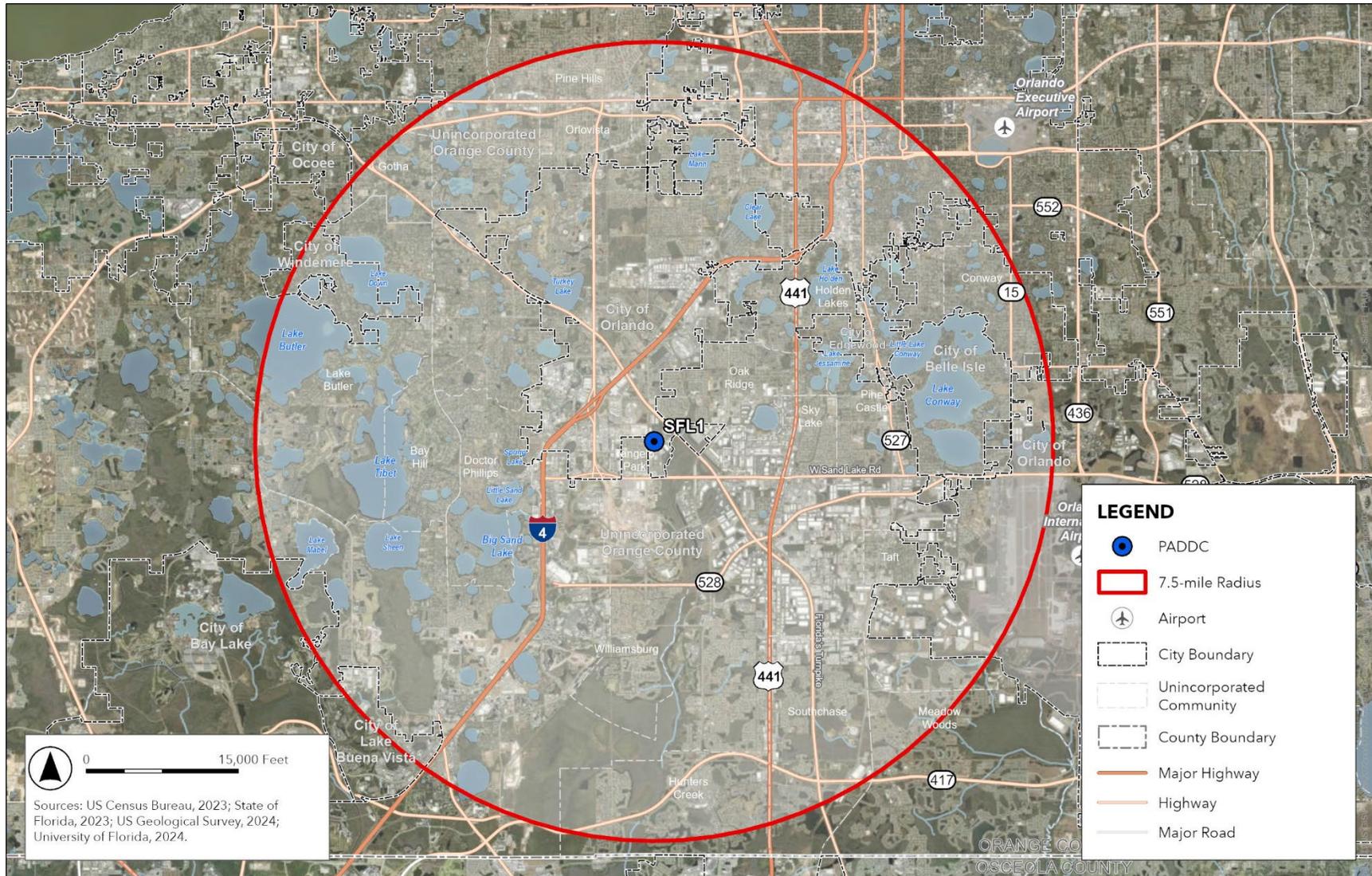
SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; Plan Hillsborough, 2024; US Geological Survey, 2024; University of Florida, 2024.

**Figure 2**  
TPA1 Drone Operation Area of Potential Effects



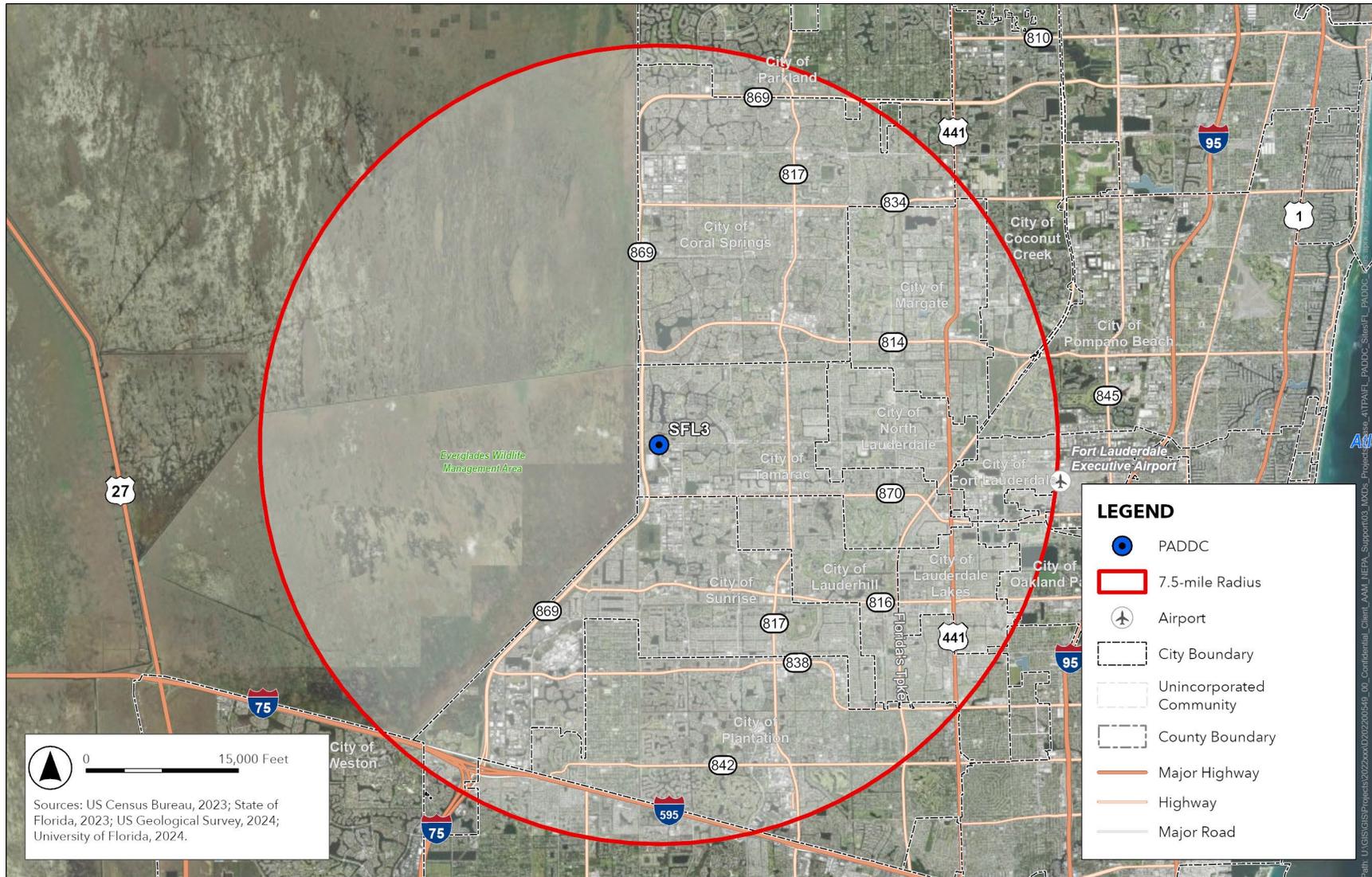
SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; Plan Hillsborough, 2024; US Geological Survey, 2024; University of Florida, 2024.

**Figure 3**  
TPA4 Drone Operation Area of Potential Effects



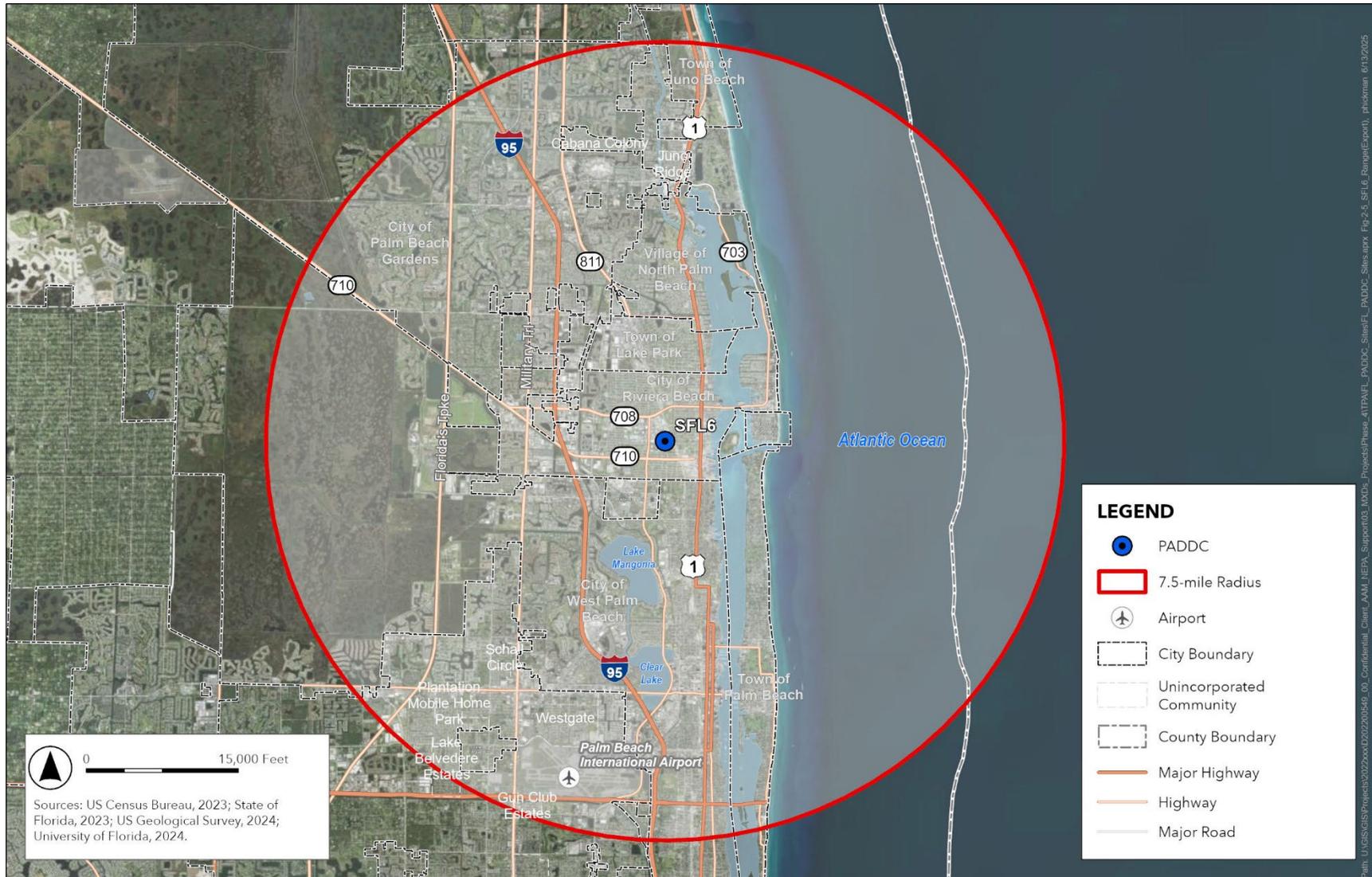
SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; US Geological Survey, 2024; University of Florida, 2024.

**Figure 4**  
SFL1 Drone Operation Area of Potential Effects



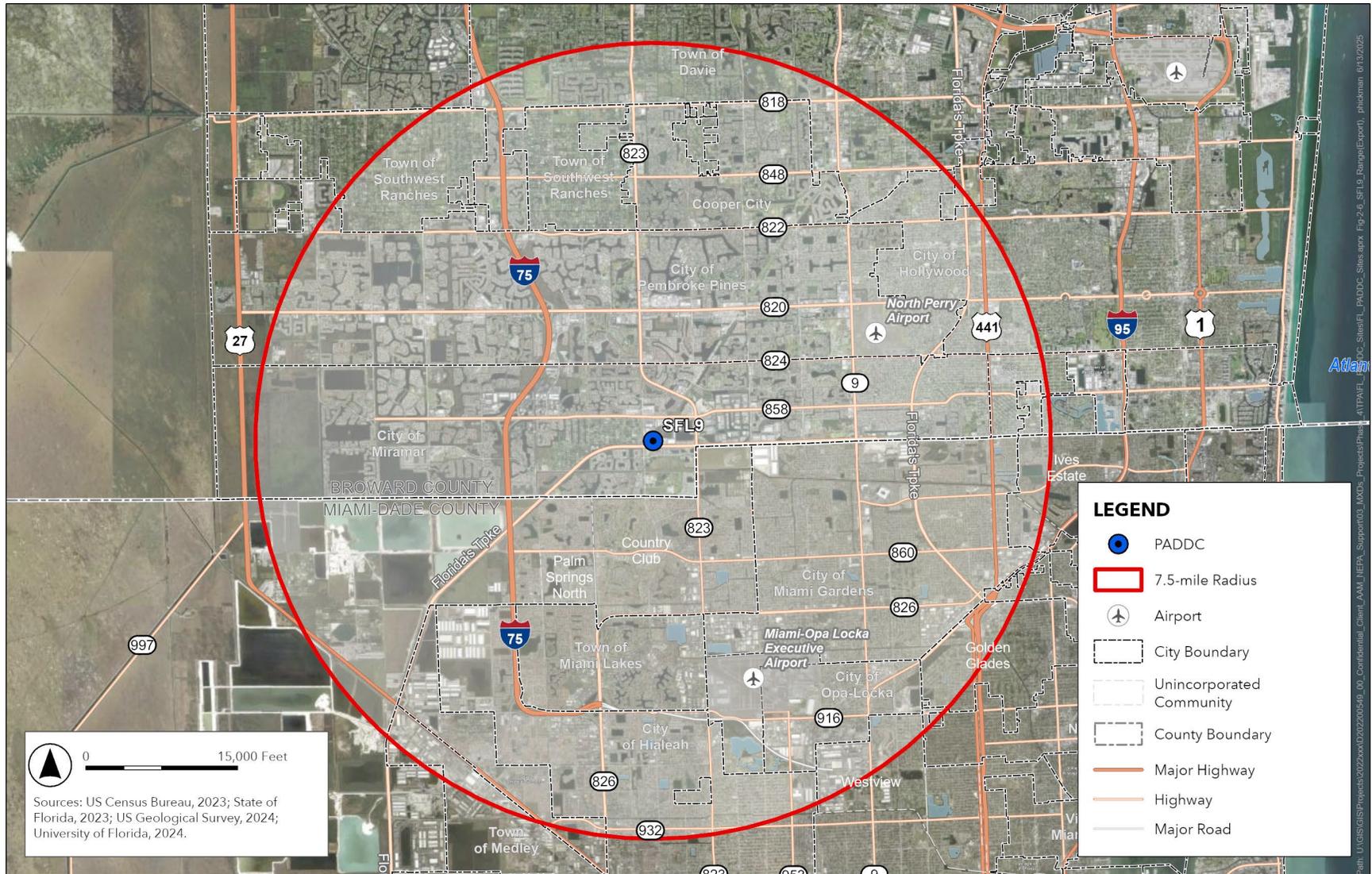
SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; US Geological Survey, 2024; University of Florida, 2024.

**Figure 5**  
SFL3 Drone Operation Area of Potential Effects



SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; US Geological Survey, 2024; University of Florida, 2024.

**Figure 6**  
SFL6 Drone Operation Area of Potential Effects



SOURCE: ESA, 2025; US Census Bureau, 2023; State of Florida, 2023; US Geological Survey, 2024; University of Florida, 2024.

**Figure 7**  
SFL9 Drone Operation Area of Potential Effects