# 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 August 2025 Draft Environmental Assessment for Amazon Prime Air Package Delivery Operations in Texas (Draft EA). The NOA announcing the public availability of the Draft EA was published on the FAA's website on August 15, 2025, which included a public review and comment period through October 1, 2025.

In total, the FAA received 11 comment submissions. When multiple topics were discussed in a single comment submission, each topic was individually identified and addressed using bracketed letters (e.g., [A], [B], etc.) Commenters were notified that any personally identifiable information included as part of their comment submission could be made publicly available, but the FAA has attempted to redact personally identifiable information when requested. The comments are presented exactly as they were received and may contain typographical errors and/or misspellings. They have not been edited in any way and are provided in this manner to show that they were quoted exactly as they were in their original form.

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

## Topic Specific Responses

### 1: Safety

49 U.S.C. § 44807 provides the Secretary of Transportation (the Secretary) with authority to determine whether a certificate of waiver, certificate of authorization, or a certificate under § 44703 or § 44704, is required for the operation of certain UAS. Section 44807(b) instructs the Secretary to base their determination on which types of UAS do not create a hazard to users of the National Airspace System (NAS) or the public. In making this determination, the Secretary must consider the size, weight, speed, and operational capability of the UAS, as well as other aspects of the proposed operation. The Secretary delegated this authority to the Administrator on October 1, 2021. In accordance with the statutory criteria provided in 49 U.S.C. § 44807, and in consideration of the size, weight, speed, and operational capability, proximity to airports and populated areas, and specific operations, the FAA determined that Prime Air's

drones and operations do not create a hazard to users of the NAS or the public. As with all operations authorized to be conducted under a § 44807 exemption, the FAA set appropriate conditions and limitations to minimize risk and maintain an equivalent level of safety to that provided and intended by the rules that would otherwise apply to the operation.

The current exemption, Exemption No. 18601E, was issued August 7, 2025.[1] The FAA's safety determinations regarding the regulatory relief necessary to enable these operations are available at Regulatory Docket No. FAA-2019-0573.

The FAA Hotline accepts reports related to the safety of the National Airspace System, violations of Federal Aviation Regulations, aviation safety issues, and reports related to FAA employees or FAA facilities.[2] The FAA Hotline provides a single venue for FAA employees, the aviation community, and the public to file their reports.

## 2: Biological Resources

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

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

1 https://www.regulations.gov/document/FAA-2019-0573-0087

2 https://www.faa.gov/about/office_org/headquarters_offices/aae/programs_services/faa_hotlines

During the review process, state and federal databases were accessed, including Texas Parks and Wildlife Department's (TPWD) database of Rare, Threatened, and Endangered Species of Texas which lists species of amphibians, birds, fish, insects, mammals, mollusks, plants, and reptiles including some that are considered Species of Greatest Conservation Need, as defined within the Texas Conservation Action Plan, updated January 31st, 2024. This list also includes all species that the director of the Texas Parks and Wildlife Department deems threatened with statewide extinction (Title 31, Part 2, Chapter 65, Subchapter G RULE, § 65.175 and § 65.176). In addition to this list, data was also received using the USFWS IPaC system for potential species listed as endangered, threatened, or species of concern, including potential migratory birds and USFWS's Birds of Conservation Concern that may occur within the study area. Appendix B provides a list of federal and state-listed species for each county within the action areas. Prime Air understands the importance of reporting collisions between aircraft and wildlife and will report any wildlife strikes via FAA Form 5200-7: Bird and Other Wildlife Strike Report. From this list, species that have the greatest potential to be impacted by the Proposed Action were identified understanding that Prime Air's aircraft would not touch the ground in any other place than the PADDCs (except during emergency landings) since they remain airborne while conducting deliveries. The operations would be taking place within airspace, and typically well above the tree line and away from sensitive habitats. After launch, Prime Air's drone would rise to a cruising altitude between 180 feet and 377 feet AGL and follow a preplanned route to its delivery site. The pre-planned route is optimized to avoid terrain and object obstructions, areas of high aircraft traffic, and areas where people may gather in large numbers such as highways, parks, and schools.

Aircraft would typically stay between 180 and 377 feet AGL except when descending to drop a package. When making a delivery, the aircraft descends, and packages are dropped to the ground from approximately 13 feet AGL. Packages are carried internally in the aircraft's fuselage and are dropped by opening a set of payload doors on the aircraft. After the package is dropped the drone then climbs vertically to approximately 180 to 377 feet and reverses the path taken, returning to the takeoff/landing pad at the PADDC. The drone would take approximately 61 seconds to complete a delivery, which includes the descent from en route altitude, dropping the package, and returning back to en route altitude. As a result, the duration of exposure by most wildlife on the ground to the visual or noise impacts from the drone would be of very short duration (approximately one minute). It is not likely that listed species would be in the vicinity of the delivery location because such locations would be developed areas. However, even if species were expected to be exposed to this noise level, the noise would be unlikely to cause significant disturbance (for context, a drone overflight at 50 feet is approximately 74.2 decibels, whereas a leaf blower at 50 feet is approximately 73 to 77 decibels).[3] At a potential maximum of 1,000 flights per day across the entire action area of each PADDC (or 22,000 total per day), the distribution and altitude of the flights are not expected to significantly affect wildlife in the action area.

The FAA initiated Section 7 consultation with the USFWS on June 11, 2025, which included a single transmittal to several sub-offices under the Texas Coastal and Central Plains Ecological Services Field Office, including those that serve the Dallas-Fort Worth, Houston, Austin, El Paso, and San Antonio areas.

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

On June 17, 2025, the Austin sub-office issued a concurrence with the FAA's determination that the Proposed Action may affect, but is not likely to adversely affect the following species within the action areas subject to this consultation:

- Tricolored bat
- Golden-cheeked warbler
- Whooping crane
- Southwestern willow flycatcher
- Yellow-billed cuckoo
- Northern aplomado falcon

The Austin sub-office indicated that the piping plover and rufa red knot were excluded from consultation because the Proposed Action does not involve a wind energy project.

On July 2, 2025, the Fort Worth sub-office issued a concurrence with the FAA's determination that the Proposed Action may affect but is not likely to adversely affect the golden-cheeked warbler and whooping crane within the action areas subject to this consultation.

Copies of all agency correspondence are provided in Appendix B of the EA.

## 3: Noise Exposure

Section 3.6 and the Technical Noise Report found in Appendix E of the EA present the noise exposure estimates associated with delivery, en route, and PADCC operations in addition to total overall noise exposure from the Proposed Action. For the noise analysis, the number of drone overflights (en route operations) and deliveries in a day are expected to be dispersed because the PADCC is centrally located in the proposed operating areas and delivery locations would be distributed generally evenly across the areas. It was also assumed that when two or more MK30 drone operating areas overlap, overflights associated with an additional 500 daily deliveries would be estimated, per operating area overlap. Therefore, a conservative estimate of 1,500 daily overflights, or half of the daily total of a maximum of 3,000 delivery overflights that could occur due to three overlapping MK30 drone operating areas, was assumed for the maximum number of overflights, and up to four daily deliveries was assumed for estimating the noise exposure over any one delivery location.

Based on these estimates, the resulting noise exposure at a delivery location at a distance of 25 feet from the delivery point for up to four daily deliveries and 1,500 daily delivery overflights would be DNL 52 dB. Likewise, the maximum noise exposure at any property line in residential zoned property for the same number of deliveries and overflights is not estimated to exceed DNL 48.6 dB. When considering only locations receiving drone overflights, the analysis shows that at these locations noise levels could reach up to DNL 48 dB.

For areas located near the PADDC, noise exposure was estimated assuming an average daily maximum of 1,000 deliveries and that all drone operations would overfly the same location in transit to or from the PADCC to delivery locations. Based on these conservative assumptions, the estimated extent of DNL 55

dB noise exposure associated with PADCC operations extended 300 feet from the PADCC drone operating pads, and DNL 60 dB was 150 feet from the PADCC pads, as shown in Table 3-6 of the EA. As shown in Figures E-1 through E-22 in Appendix E-2 of the EA, the DNL 65 dB contour extends approximately 100 feet from the PADDC drone operating pads.

Considering the overall combined estimated noise levels for en route, delivery, and PADCC operations, the maximum noise exposure levels within the action area would occur at the PADDC sites where noise levels at or above DNL 55 dB would extend approximately 300 feet from the PADDCs. Noise levels at or above DNL 65 dB would extend approximately 100 feet from the PADDCs, although this is within the PADDC site property boundaries. Additionally, the estimated noise exposure for en route operations could reach a maximum of DNL 48 dB at any location within the action area, and the estimated noise exposure for delivery operations, including en route overflights from up to two overlapping MK30 operating areas, would not have the potential to exceed DNL 52 dB at any location in the action area. Considering these noise exposure levels, the Proposed Action is not expected to exceed the threshold of significance (DNL 65 dB) at the nearest noise sensitive location or result in a DNL 1.5 dB or greater increase at a noise sensitive area already exposed to aviation noise levels of DNL 65 dB or newly expose a noise sensitive area to DNL 65 dB.

## 4: Noise Metrics

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

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

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

The FAA’s use of the A-weighted sound level and the DNL metric is also consistent with the findings of the June 1980 Federal Interagency Committee on Urban Noise (FICUN) report entitled “Guidelines for Considering Noise in Land Use Planning and Control.” The 1980 FICUN report was adopted by the U.S. Department of Transportation (DOT) and the U.S. Environmental Protection Agency (EPA), both of which were FICUN members. FAA represented DOT at proceedings of FICUN and continues to

coordinate across the Federal government to carry out interagency coordination on matters related to aviation noise research including with FICUN's successor bodies.

Additionally, the FAA Reauthorization Act of 2018 (the Act) (Pub. L. 115-254) (Section 188) directed the FAA to submit a report evaluating alternative noise metrics to the current DNL standard. The report includes information on the A-Weighted sound level and DNL used to inform federal policies as it relates to aircraft noise.[4] The FAA has considered the use of other noise metrics as a supplement to DNL, such as Number Above (NA) a Maximum Sound Level (Lmax) as detailed in the report referenced above, for quantifying the noise exposure from UA operations. However, due to the low noise levels associated with UA operations, DNL, to-date, has represented a better metric for quantifying noise exposure for UA. As DNL is a cumulative noise metric, it considers the additive effect of multiple noise events including duration and loudness of the event regardless of if the event exceeds a specified sound level threshold. Other supplemental noise metrics such as Number Above Lmax (NALmax) only account for noise exposure if a specified Lmax is exceeded, and as such do not sufficiently capture the additive effect of exposure to repeated low noise operations such as is the case with UA.

## 5: Privacy

The FAA's mission is to provide the safest, most efficient airspace system in the world, but that does not include regulating privacy. Although the FAA is not authorized to impose regulations based on privacy concerns, it intends to continue collaborating with stakeholders, including the public and other agencies with authority and expertise in privacy law and policy.[5] The FAA's lack of jurisdiction over privacy, however, does not relieve Prime Air from complying with other laws and regulations, including those related to privacy, that may be applicable to Prime Air's operations in Texas.

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

## 6: Quality of Life

"Quality of life" is not a category that is specifically called out in NEPA, its implementing regulations, or FAA Order 1050.1F. However, Section 101 of NEPA sets forth a national policy "to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." The concept of quality of life is frequently associated with several environmental resource categories addressed in NEPA documents, including noise and socioeconomics.

[4] "*Report to Congress FAA Reauthorization Act of 2018 (Pub. L. 115-254) Section 188 and Sec 173*" can be found here: https://www.faa.gov/sites/faa.gov/files/2021-11/Day-Night_Average_Sound_Levels_COMPLETED_report_w_letters.pdf

[5] Additional information on the FAA's Privacy Impact Assessments is available here: https://www.transportation.gov/individuals/privacy/privacy-impact-assessments.

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

## 7: Health Effects of Noise

The FAA implements NEPA through FAA Order1050.1F. Associations between aviation noise and disruption to normal activity are key components in the establishment of FAA's residential noise impact thresholds defined in FAA Order 1050.1F and the 1050.1F Desk Reference. Use of the DNL 65 dB as the threshold for significant noise exposure is designed to account for sleep disturbance, speech interference, and annoyance among other factors. The EA was prepared consistent with FAA's noise criteria currently identified within FAA Order 1050.1F and the 1050.1F Desk Reference. Applying the noise criteria in FAA Orders and guidance, the aviation noise from drone overflights and delivery locations in the Proposed Action is well *below* the threshold of significance; even in the vicinity of the PADDCs, the Proposed Action is not expected to exceed the significance threshold at the nearest noise sensitive location.

## 8: Reasonably Foreseeable Effects

Noise exposure resulting from implementation of the Proposed Action along with other actions were evaluated in Chapter 4 of the EA. The evaluation found that, even in areas with existing aviation noise sources within the Action Areas, the Proposed Action would not contribute to significant reasonably foreseeable noise impacts.

Additionally, as noted in Chapter 4 of the EA, Prime Air's flight route planning software would take into account air traffic to avoid dense airspace restrictions, such as airport runways and heliports. This would help avoid potential noise reasonably foreseeable effects with other air traffic near Class B and Class C airspace. There are several Part 135 commercial drone package delivery operators known to be conducting operations in Texas, including DroneUp, LLC, Zipline International Inc., and Wing Aviation, LLC. These operators may conduct commercial drone delivery service in proximity to Prime Air's proposed MK30 operations areas or the PADDCs, which are located in areas zoned for commercial activities. However, the addition of Prime Air's commercial delivery service is not expected to result in reasonably foreseeable effects on other potential Part 135 commercial drone operations. Any future Part 135 operators would be required to work with the FAA to complete an environmental review before beginning operations, ensuring that any potential reasonably foreseeable effects are properly analyzed and disclosed, and the appropriate siting of potential drone operating facilities would be considered to avoid a significant impact on the environment. In the future, other drone operators may propose locating operations within this Proposed Action's action areas. Should that occur, Prime Air understands the potential for impacts may increase due to another operator's activities and would work with that operator and the FAA to mitigate potential impacts. Additionally, the FAA would conduct a new environmental analysis – including noise and reasonably foreseeable impacts – prior to another operator beginning drone package delivery operations in these areas.

# Public Comments and FAA Responses

| Public Comment No. | Commenter Name |
|---|---|
| 01_TCEQ | Texas Commission on Environmental Quality (TCEQ) |
| 02_Tollett | Laurian Tollett |
| 03_Yu | Ken Yu |
| 04_CoA | City of Austin, Texas (CoA) |
| 05_Rodgers | Bill Rodgers |
| 06_CoM | City of Missouri, Texas (CoM) |
| 07_Zogakis | Nick Zogakis |
| 08_CoSM | City of San Marcos, Texas (CoSM) |
| 09_SATX | Greater SATX Regional Economic Partnership |
| 10_ACD | Alamo Colleges District |
| 11_CoHV | City of Hedwig Village |

# Public Comment – 01_TCEQ

*Dear Federal Aviation Administration,*

*Attached is the NEPA review by TCEQ for the proposed project "DRAFT ENVIRONMENTAL ASSESSMENT FOR DRONE PACKAGE DELIVERY IN TEXAS" in BEXAR, BRAZORIA, CHAMBERS, COLLIN, COMAL, DALLAS, DENTON, EL PASO, FT. BEND, GALVESTON, GUADALUPE, HARRIS, TRAVIS, MCLENNAN, MONTGOMERY, TARRANT, WILLIAMSON AND WISE County.*

*Please feel free to contact us if you require additional information.*

*Have a great day!*

*Stefania Muñoz*
*Information Specialist II*
*External Relations Division*
*Texas Commission on Environmental Quality*
*Ph: 512-239-5538*
*stefania.munoz@tceq.texas,gov*

*(Transcript of email attachment follows)*

*September 15, 2025*
*Federal Aviation Administration*
*Suite 802W C/O AVS Environmental*
*800 Independence Ave SW*
*Washington, DC 20591*
*Via: E-mail*

*Re: TCEQ NEPA Request #2025-297. DRAFT ENVIRONMENTAL ASSESSMENT FOR DRONE PACKAGE DELIVERY IN TEXAS. Bexar, Brazoria, Chambers, Collin, Comal, Dallas, Denton, El Paso, Ft. Bend, Galveston, Guadalupe, Harris, Travis, Mclennan, Montgomery, Tarrant, Williamson and Wise County.*

*Dear Federal Aviation Administration,*

*The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments:*

*The proposed action is located in multiple counties, many of which are designated nonattainment for the 2008 eight-hour ozone National Ambient Air Quality Standard (NAAQS) and/or the 2015 eight-hour ozone NAAQS; therefore, federal Clean Air Act, §176(c) general conformity requirements apply.*

*Per federal general conformity regulations at 40 CFR §93.153, a conformity demonstration may be required when the total projected direct and indirect volatile organic compounds (VOC) and nitrogen oxides (NOX) emissions—precursor pollutants that lead to the formation of ozone—from an applicable*

*federal action are equal to or exceed the de minimis emissions level for the area's classification. The most stringent de minimis level for Texas ozone nonattainment areas is 25 tons per year (tpy).*

*Additionally, a portion of El Paso County is designated nonattainment for the 1987 NAAQS for particulate matter of less than 10 microns (PM10) with a classification of moderate, and a portion is in maintenance status for the 1971 carbon monoxide (CO) NAAQS. Per federal general conformity regulations at 40 CFR §93.153, a conformity demonstration may be required when the total projected direct and indirect PM10 emissions from an applicable federal action are equal to or exceed the de minimis emissions level of 100 tpy for PM10 NAAQS moderate nonattainment areas, and 100 tpy for CO maintenance areas.*

*For emissions analyses conducted to determine general conformity applicability, the TCEQ recommends using a methodology consistent with the requirements at 40 CFR §93.159. According to the information provided, emissions from this proposed action are expected to be de minimis for all applicable pollutants.*

*The Office of Water recommends that the environmental assessment address actions that will be taken to prevent surface and groundwater contamination.*

*Any debris or waste disposal should be at an appropriately authorized disposal facility.*

*The Schultz Lane site in Pflugerville is located adjacent to the Edwards Aquifer Transition Zone, which is a regulated portion of an EPA-designated sole source aquifer. The draft environmental assessment indicates that no construction will be conducted at the project sites; however, please ensure that any activities that occur within the regulated portion of the EA are done in accordance with TCEQ rules at 30 TAC Chapter 213.*

*Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA coordinator at (512) 239-5538 or NEPA@tceq.texas.gov.*

*Sincerely,*

*Ryan Vise,*
*Division Director*
*External Relations*

# FAA Response – 01_TCEQ

Thank you for your comments. The FAA has conducted a comprehensive assessment of potential impacts to air quality, hazardous materials, solid waste, pollution prevention, and water resources (wetlands, floodplains, surface water, groundwater, wild and scenic rivers) as detailed in the EA and confirms that these assessments comply with TCEQ rules and EPA regulations.

The MK30 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 and minimal emissions associated with charging the drone batteries are unlikely to contribute to any exceedance of National Ambient Air Quality Standards.

The Proposed Action does 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.

Lastly, 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. The Proposed Action would also not result in any changes to existing discharges to water bodies, create a new discharge that would result in impacts to surface waters, modify a water body, and 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 and would not result in impacts to water resources.

For more information on the environmental assessment process as it relates to air quality, hazardous materials, solid waste, pollution prevention, and water resources for the Proposed Action please refer to Chapter 3 of the EA.

## Public Comment – 02_ Tollett

*I oppose the Pasadena Amazon drone activity. We are in a high density bird migration route and coastal habitat. We do not need more aircraft in the area.*

*Sent from my iPhone*

## FAA Response – 02_ Tollett

Thank you for your comments. The FAA conducted a comprehensive assessment of potential impacts to biological resources, including birds, and consulted with both the USFWS and TPWD. The FAA determined that the Proposed Action is unlikely to significantly affect wildlife in Texas and the USFWS concurred with this determination. For more information on the determination process, please refer to *Topic Specific Response 2: Biological Resources.*

## Public Comment – 03_ Yu

*2 things.*

**[A]** *1) This is making people lazier and lazier.*

**[B]** *2) I'm not in favor of hearing any type of noises that's not bees buzzing or birds chirping. Everything else is noise. And...who decides what's acceptable amount of noise? Definitely not us. Not sure the point of these submissions.*

## FAA Response – 03_ Yu

Thank you for your comments.

**[A]** For additional information regarding “quality of life” please refer to *Topic Specific Responses 6: Quality of Life* and *7: Health Effects of Noise.*

**[B]** Associations between aviation noise and disruption to normal activity are key components in the establishment of FAA's residential noise impact thresholds defined in FAA Order 1050.1F. Use of the DNL 65 dB as the threshold for significant noise exposure is designed to account for sleep disturbance, speech interference, and annoyance among other factors. For additional information, please refer to *Topic Specific Response 4: Noise Metrics*.

# Public Comment – 04_CoA

*To Whom it May Concern,*

*Please find attached and below the City of Austin's formal comments in response to the Draft Environmental Assessment (EA) for Amazon Prime Air's proposed drone package delivery operations in Texas.*

*We greatly appreciate the opportunity to provide input on this proposed initiative and its potential impacts on our community. Should you have any questions at all, please don't hesitate to reach out.*

*Sincerely,*

*Christian Aguirre (he/him)*
*Government Relations Senior Coordinator*
*Government Relations Office*
*919 Congress Ave, Suite 500, Austin, TX 78701*
*(512) 974-6003 (direct)*
*christian.aguirre@austintexas.gov*

---

*To Whom it May Concern:*

*On behalf of the City of Austin, thank you for the opportunity to provide comments on the Draft Environmental Assessment (EA) for Amazon Prime Air's proposed commercial drone delivery operations in Texas. As a rapidly growing metropolitan area with a busy Class C airport (AUS), multiple hospital heliports, a regional public safety aviation program, and extensive parkland, endangered species preserves, historic districts, and vulnerable communities, the City of Austin is uniquely positioned to provide perspective on how these operations may affect local residents and resources.*

*The following comments represent a consolidated response from multiple City departments.*

*GENERAL COMMENTS*

**[A]** *Noise: The Draft EA concludes that noise impacts will be minimal, but it does not sufficiently consider cumulative effects of frequent operations in densely populated areas. To protect residents and natural resources, FAA should require: Detailed noise modeling: Use event-based metrics (SEL/LAmax), not just DNL averages.*

*Ongoing environmental noise monitoring: Capture impacts on people and wildlife, with data collected and shared with state and local authorities.*

*Prohibitions on drone deliveries in shared public spaces like parks and greenspaces: Develop an avenue for complaints regarding noise, wildlife impacts, and other affects from drone operations.*

**[B]** *Public Safety & Incident Response: The proposal represents a major expansion of low-altitude drone operations in Texas, with implications for Austin's public safety agencies. Risks include conflicts at the 200 - 400 ft AGL band, downed UAS in the public right-of-way, and payload security concerns. To mitigate these risks, FAA should require:*

*Automatic Airspace Deconfliction: Integration with UTM (Uncrewed Traffic Management) to provide real-time visibility to Austin public safety agencies. Drones must yield or auto-divert around declared emergency incident Temporary Flight Restrictions (TFRs).*

*Public Safety Override Protocols: A mechanism where Amazon suspends or diverts flights in affected zones when police/fire/EMS declare operations. This may require coordination with CTECC for emergent geo-fencing.*

*Event-Based Restrictions: Require no-fly buffers during large-scale events where public safety UAS coordinate airspace.*

*Incident Reporting: Regular self-reporting by the company of any issues or incidents during operations.*

**[C]** *Airspace Integration: While the Draft EA references FAA ATC coordination, it does not specifically address local conflicts. The FAA should require:*

*Consultation: Between Amazon and local airports prior to route approvals.*

*Contingency protocols: For downed or lost-link drones in the right-of-way as there is a risk of downed UAS causing significant damage and potential loss of life to users of the ROW (e.g. emergency landing on interstates).*

**[D]** *Environmental Consequences: The Draft EA concludes Amazon's proposal "may affect, not likely to adversely affect (NLAA)" the Colden-cheeked Warbler (GCWA) and several other listed species. While we acknowledge U.S. Fish & Wildlife Service (USFWS) concurrence, stronger commitments are necessary to safeguard other sensitive areas. FAA should require:*

*Breeding-season timing: From March-July, no flights within 0.5 mile of mapped GCWA habitat from sunrise to 10 am and prohibit hover/loiter near native woodlands. Consideration should be taken for other species such as bat colonies at Congress Avenue Bridge and Bracken Cave, and salamander habitats.*

*Adaptive management: Commit to incident/wildlife-interaction reporting to FAA, USFWS, and the City, two breeding seasons of edge-habitat monitoring, and re-initiation triggers if data or complaints suggest potential take.*

**[E]** *Transparency & Data Sharing: FAA should require:*

*Shared Flight Paths: Amazon should be transparent in their flight path and share with appropriate resources (i.e., law enforcement, emergency management, environmental, etc.).*

*Development of Drone Privacy Policy and Data Standards Policy: Ensure that privacy and property rights are respected.*

**[F]** *Historic, Cultural, and Socioeconomic Impacts: The Draft EA does not provide sufficient cultural inventory for Austin or assess socioeconomic disparities. The City recommends:*

*Evaluation of Indirect Impacts on Historic Districts: The location of STX9 is in the Eastern Cresent of Travis County which historically has been an underserved area of Austin with significant socio-economic and racial disparities. Without a cultural inventory (e.g. historic churches & graveyards, areas of community and cultural significance, etc.) it is difficult for the FAA to conclude that drone operations – whether noises, or visual – will have no impact.*

*Broader analysis beyond impact of light: Consider how 1,000 flights per day affect aesthetics, rural nature, and enjoyment of property of the population within the service area.*

*SPECIFIC COMMENTS BY SECTION*

*Section Summary Comments/Recommendations*

*Biological Resources (Wildlife)*

**[Same Topic as D above]** *Sec. 3.3 Draft EA anticipates "no significant effects". Require adaptive management that includes ongoing monitoring, reporting, and operational adjustments (i.e. rerouting, time-of-day restrictions, added buffers) if wildlife disturbance or disproportionate community impacts emerge.*

*Environmental Consequences*

**[Same Topic as B above]** *Sec. 3.3.3 Prime Air drones are considered airworthy, but crashes could spark wildfires; Amazon would notify local fire responders and coordinate response. Require UTM integration, public safety override protocol, event-based restrictions, and regular self-reporting of incidents.*

*Environmental Consequences*

**[Same Topic as F above]** *Sec. 3.5.3.2 (Proposed Project) FAA found only minor, reversible effects on historic sites; the Texas Historical Commission concurred but urged avoiding flights near the Houston National Cemetery. Conduct inventory and analysis of Austin historic districts; assess indirect impacts; consult with local jurisdictions and the State Historic Preservation Office (SHPO).*

*Environmental Consequences*

**[Same Topic as A above]** *Sec. 3.6.3.2*

*(Proposed Action) Noise impacts from operations are not expected to result in a significant impact. Require event-based analysis (SEL/LAmax), ongoing noise monitoring, citizen reporting channels, and prohibit deliveries in*

*CONCLUSION*

*The City of Austin welcomes the opportunity to collaborate further on this process and respectfully submits these comments for your consideration.*

*Should you have any questions, please reach out to Carrie Rogers, Government Relations Officer, at carrie.rogers@austintexas.gov or 512.923.7577.*

Sincerely,

T.C. Broadnax
City Manager
City of Austin

## FAA Response – 04_CoA

Thank you for your comments.

**[A]** For a discussion of the cumulative noise exposure from Prime Air's proposed operations with those of other drone operators and aviation noise sources, please refer to *Topic Specific Response 8: Reasonably Foreseeable Effects*.

Monitoring noise levels after the implementation of the Proposed Action are not required and are outside the scope of the NEPA process; as such, there will not be ongoing noise monitoring of drone operations.

Sound Exposure Level (SEL) and Maximum Sound Level (LA max) are not required noise metrics under NEPA; as such, they were not calculated for the Proposed Action.

The FAA encourages commenters to reach out to Prime Air regarding concerns related to potential noise or other disturbances. Commenters can email Prime Air at amazondronefeedback@amazon.com or call 888-283-0587.

**[B]** Please refer to *Topic Specific Response 1: Safety*. Prime Air proactively coordinates with law enforcement and emergency management agencies as needed to protect for event-based airspace restrictions. Likewise, Prime Air submits a Flight Operations Performance Report to the FAA on a monthly basis, and proactively reports any safety incidents to the FAA. Prime Air works with the FAA to resolve safety related concerns or violations.

**[C]** The primary purpose of a NEPA EA is to evaluate the potential environmental impacts of proposed actions. The NEPA process ensures that any federal action does not have significant adverse effects on the human environment. However, the NEPA EA process does not address airspace access, which is governed by a separate set of safety and regulatory requirements. Airspace access is determined based on an operator's ability to meet the necessary safety standards and requirements established by the FAA.

These decisions are made through a rigorous process that ensures safe and efficient use of the national airspace system. Thus, while your concern is noted, it falls outside the scope of the NEPA EA process.

**[D]** Please refer to Topic Specific Response 2: Biological Resources.

**[E]** Please refer to *Topic Specific Response 5: Privacy*. Prime Air is proactively coordinating with law enforcement and emergency management agencies, as well as other drone operators in the area.

**[F]** The FAA evaluated the effect of drone operations on historic properties and determined the effects of drone operations within the action area would be limited to non-physical, short-term, reversible impacts such as the introduction of audible and/or visual elements. The number of daily drone operations would be limited such that any historic or cultural resource would only be subject to a small number of overflights per day. Furthermore, as described in Section 3.6 of the EA, a noise analysis concluded that noise levels would be below the FAA's threshold for significance, even for areas in the immediate vicinity of the PADCC which would experience the highest noise exposure levels. For the Proposed Action, the FAA initiated consultation with the TX SHPO (the Texas Historical Commission [THC]) on May 19, 2025, seeking concurrence with the FAA's definition of the APEs, including Austin, and for its finding of *no adverse effects*. The THC concurred with the FAA's determination of *no adverse effects* on June 18, 2025.

Section 4(f) of the U.S. Department of Transportation (DOT) Act (codified at 49 U.S.C. § 30I)) protects significant publicly owned parks, recreational areas, wildlife and waterfowl refuges, and public and private historic sites. As listed in Table C-1 of Appendix C of the EA, the FAA identified a total of 716 properties that could meet the definition of a Section 4(f) resource, including public parks administered by city, county, township and state authorities. However, as noted in Section 3.4.2 of the EA, there are no state parks, national parks, or wildlife or waterfowl refuges within the drone operating area. Drone operations, however, could occur over local parks and recreation areas. However, as discussed in Section 3.6, the Proposed Action would not result in a significant increase in noise levels at any location within the action area. As further described in Section 3.8, the short duration of en route flights would minimize any potential for significant visual impacts. Therefore, the FAA has determined that the Proposed Action would not cause substantial impairment, or direct or constructive use, as defined in Section 3.4.1, to any of the Section 4(f) resources in the action areas.

## Public Comment – 05_Rodgers

*I am a resident of Richardson who lives near the proposed drone hub. My home is approximately half a mile (as the drone flies) from the drone hub. Since drones will take off and land vertically, any sound generated would be much less than the sound of lawn mowers and leaf blowers that are in the neighborhood each day.*

*I support the establishment of the Amazon Prime Drone Hub in Richardson, TX.*

*Respectfully,*

*Bill Rodgers*
*3511 Newhaven Dr*
*Richardson, TX 75082*

## FAA Response – 05_Rodgers

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

## Public Comment – 06_CoM

To Whom It May Concern:

On behalf of the City of Missouri City, Texas (the "City"), I submit the following comments in response to the Draft EA for Amazon Prime Air's proposed drone delivery operations in the City.

Thank you!

Matthew Ditman
Assistant City Attorney II
1522 Texas Parkway | Missouri City, Texas 77489
t. +12814038657
*Matthew.Ditman@Missouricitytx.gov*

*September 18, 2025*
*Via email at 9-faa-drone-environmental@faa.gov*

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

*Re: Comments on the Federal Aviation Administration ("FAA") Draft Environmental Assessment ("Draft EA") for Amazon Prime Air Package Delivery Operations in Missouri City, Texas*

*To Whom It May Concern:*

*On behalf of the City of Missouri City, Texas (the "City"), I submit the following comments in response to the Draft EA for Amazon Prime Air's proposed drone delivery operations in the City. The City is home to one of the proposed Prime Air Drone Delivery Centers ("PADDCs"), referred to in the Draft EA as the SAHx PADDC, which is located at the northwest corner of Beltway 8/Sam Houston Tollway & Highway 90, Missouri City, Texas, 77489.*

*While the City recognizes the potential benefits that innovations in package delivery present, the City requests that the FAA not grant final approval of the proposed operations until the Draft EA is supplemented to address the following local concerns in greater detail:*

**[A]** *1. Proximity to Residential Areas and Noise Impacts*

*The Draft EA states that the nearest residential area is only 0.28 miles from the SAHx PADDC and proposes up to 1,000 drone flights per day (365,000 annually) occurring between 7:00 a.m. and 10:00 p.m. at altitudes of 180–377 feet. This is in an area with over 900,000 residents within a 7.5-mile radius and a density of 5,183 residents/sq mi. Given these facts, noise and visual impacts are likely significant. As such, the City requests that the FAA require additional mitigation measures, including but not limited to:*

- *More granular mapping and public disclosure of flight paths over neighborhoods, schools, and parks;*
- *Stricter caps on daily flight numbers (e.g., maximum 500 per day/182,500 annually);*
- *Increased minimum altitudes and adjusted routes to reduce sound exposure m proximities; and*
- *Shorter daily operating hours ( ending daily drone operations by 6 p.m., not 10 p.m.).*

**[B]** *2. Safety and Emergency Response Protocols*

*Given (i) the weight of the MK30 drone (a maximum of 83.2 lbs. at takeoff), and (ii) the dense development and high-traffic areas surrounding the SAHx PADDC, the City specifically requests that the FAA require:*

- *Coordination agreements between Amazon and the City's emergency services departments to ensure rapid incident response; and*
- *Incident reporting protocols that involve the City's officials and are accessible to the City's general public.*

**[C]** *3. Community Outreach and Transparency*

*The Draft EA describes the initial public comment period but lacks provisions for continued public engagement once operations begin. Given the scale of the proposed operations, the City requests:*

- *Ongoing public notification systems and feedback mechanisms, including a clear channel for complaints to both FAA and Amazon, and transparent reporting; and*
- *Quarterly public reports to City officials summarizing drone activity, safety incidents, and community feedback.*

*In sum, the City respectfully requests that the FAA require all the mitigation and engagement measures identified above as a condition for approval of Amazon's proposed operations.*

*Sincerely,*

*Matthew Ditman*
*Assistant City Attorney II*
*CITY OF MISSOURI CITY*

# FAA Response – 06_CoM

Thank you for your comments.

**[A]** As detailed in Section 3.6 and the Technical Noise Report found in Appendix E of the EA, the Proposed Action is not expected to generate noise levels that exceed the threshold of significance (DNL 65 dB) at the nearest noise sensitive location or result in a DNL 1.5 dB or greater increase at a noise sensitive area already exposed to aviation noise levels of DNL 65 dB or newly expose a noise sensitive area to DNL 65 dB. For more information on the noise exposure analysis please refer to *Topic Specific Response 3: Noise Exposure.*

Visual effects were also analyzed in Section 3.7 of the EA, and it is estimated that at typical operating altitude and speeds the drone would be observable for approximately 3.6 seconds by an observer on the ground. Any visual effects are expected to be similar to existing air traffic in the vicinity of the operating areas and therefore, the Proposed Action would not result in significant visual impacts.

**[B]** Please refer to *Topic Specific Response 1: Safety*.

**[C]** In parallel with the public comment and review period for the draft EA and after conclusion of the NEPA process, it is important for Prime Air and local governments to continue to engage the local community for concerns related to drone operations. Drone package delivery operations require local approvals in addition to the FAA's airspace authorization. The siting of Prime Air's PADCCs and associated drone delivery infrastructure are subject to applicable state and local land use and zoning requirements. As such, the FAA does not select the locations for Prime Air to conduct operations, and Prime Air is responsible for complying with any such applicable laws relevant to commencing and continuing their operations and includes any state or local requirements for conducting public outreach or meeting specific reporting requirements. As such, the FAA encourages state and local governments, and the public, to engage with Prime Air directly for any concerns or requests related to Prime Air's drone operations. Requests or concerns may be relayed to Prime Air via email at amazondronefeedback@amazon.com or by calling 888-283-0587.

Likewise, the FAA maintains a hotline for drone related and other concerns regarding the safety of the National Airspace System, violations of Federal Aviation Regulations, aviation safety issues, and reports related to FAA employees or FAA facilities. The FAA Hotline provides a single venue for FAA employees, the aviation community, state and local governments, and the public to file their reports. Details on the hotline may be found at: https://www.faa.gov/about/office_org/headquarters_offices/aae/programs_services/faa_hotlines.

# Public Comment – 07_ Zogakis

*Dear FAA:*

*In the attached PDF document, please find my feedback on the environmental assessment report for Amazon Prime Air Drone Delivery in Texas.*

*Sincerely,*

*Nick Zogakis, PhD*

*(Transcript of email attachment follows)*

*Comment on Draft Environmental Assessment for Drone Package Delivery in Texas*

*Nick Zogakis*

*9/22/2025*

*1 INTRODUCTION*

*Amazon Prime Air (Amazon) is seeking Federal Aviation Administration (FAA) approval to expand its drone delivery service to multiple locations in Texas. The FAA has released a draft Environmental Assessment (EA) report and requested public feedback. My residence is directly impacted by the Amazon drone service, since I live within 1.2 miles of the STX-8 site. I have reviewed the draft EA and believe that it inadequately assesses the impact of the proposed drone delivery service. The three main areas in which the report falls short include the following:*

- *Noise assessment*
- *Privacy concerns*
- *Psychological impact*

*The following sections of this note expand further upon my concerns in these areas.*

**[A]** *2 NOISE ASSESSMENT*

*When it comes to drone delivery service, the first item that usually sparks the public's interest is the impact on the background noise level, and this concern is quite justified. In the EA, the FAA continues to rely on a methodology based on the concepts of decibels A-weighted (dBA), day-night average sound level (DNL), and their predetermined noise-significant threshold. The first of these concepts represents the noise level by combining the contributions across the entire audio spectrum into a single number using logarithmic weighting. The DNL is a FAA methodology that attempts to measure cumulative exposure to noise over a 24-hour period, with more weighting applied to nighttime hours where the noise is deemed to be more unacceptable.*

*While it is noble that the FAA has attempted to apply a uniform, mathematical approach to assess the impact of aircraft (drone) noise, recent experience has shown that the approach is flawed and needs to be revisited. This statement is justified by considering that the FAA issued a report titled "Final Environmental Assessment and Finding of No Significant Impact/Record of Decision" for Amazon drone delivery in College Station Texas. The report is available at the following website:*

*https://www.faa.gov/sites/faa.gov/files/FONSI-ROD_Final-EA-Amazon-Prime-Air_College-Station-TX.pdf*

*In this report, the FAA determined that the Amazon drone delivery service would have no significant impact on the residents of College Station. However, multiple articles revealed that this was not the case at all, an example of which is found at the following website:*

*https://www.wired.com/story/texas-amazon-drones-stop-flying/*

*There are many more articles like the one above, which are easily found through an Internet search. Note that in the end, Amazon decided to pull out of College Station, partially due to constant complaints from the residents due to noise. It is true that the EA report was based on the previous version of the Amazon drone, but the fact that this drone was deemed acceptable in the report casts significant doubt on the FAA methodology.*

*I also have personal anecdotal evidence on the shortcomings of the FAA approach. The FAA has approved Wing drone delivery service that includes my Richardson neighborhood. The Wing drones have been deemed by the FAA as having no significant impact:*

*https://www.faa.gov/uas/advanced_operations/nepa_and_drones/20250421_Wing_DFW_Final_SEA_Combined.pdf*

*However, it is unmistakable when a Wing drone flies overhead, with the high-pitched noise emitted by the drone dominating the environment. More concerning, during a recent bike ride I approached an area of the neighborhood from which an incredibly loud sound was being emitted. My initial reaction was that there must be significant renovation work on a home in the area. However, once I reached the source of the noise, I encountered one of the Wing drones hovering over the front yard of the house, while dropping its package to the ground.*

*These examples clearly indicate that the methodology the FAA continues to use is falling short of its goal. Part of the problem may be that the dBA is not properly accounting for the frequency profile of the drones, despite the A-weighting skewed towards higher frequencies. Perhaps the noise significant threshold should be lowered or the DNL methodology is not capturing the cumulative effect. Whatever the reason, the FAA should halt further environmental assessment studies until it can determine a more accurate approach to assessing the impact of drone noise. At this point in time, there should be plenty of real-world experience with Amazon drone delivery based on College Station, TX and Tolleson, Arizona to enable the FAA to derive a more representative model.*

**[B]** *Another issue with the FAA approach is that it appears it is assessing each drone independently. As mentioned above, Wing already services the STX-8 service area. With the potential introduction of yet another drone service, the FAA should assess the cumulative impact of all drones (e.g. Wing + Amazon in this example) rather than each one individually.*

**[C]** *3 PRIVACY CONCERNS*

*A deeply concerning aspect of drone delivery service is the complete disregard for privacy concerns. In an era where doorbell and other home security cameras are prevalent, the fenced backyard is one of the few areas left for outdoor privacy on one's property. This privacy is completely violated with the introduction of drone delivery service.*

*To provide some insight into the depth of the problem in the case of the proposed Amazon drone delivery service, we performed a Matlab simulation to predict the number of times per day an individual property would be surveyed by the drone. For simplicity, we assumed that the delivery points were randomly distributed over an area with a 7.5-mile radius. Each delivery represents a flight from the originating point to the destination and back, which results in two visits to each location along the drone's flight path. The MK30 drone flies up to a height of 400 feet, so we used a nominal 200-foot altitude for the simulation. Since information regarding the drone cameras is proprietary, we assumed a nadir pointing camera with a 100° field of view (FOV). This seems reasonable given the specifications of cameras that might be used in such an application. With a 200-foot altitude and a 100° FOV, this represents a ground area coverage of 4.1 acres, or about 16 homes assuming ¼ acre size home lots. The simulation sampled the area every one quarter of an acre and recorded the number of times a location fell within the FOV of the drone during the delivery.*

*Figure 1 presents the results of a Monte Carlo simulation of 365 days of deliveries, with 1000 deliveries per day. The numbers have been normalized to represent the number of visits per day (i.e. totals divided by 365). With the simulation parameters, the maximum number of visits per day to any one location is 2000. To make the heat map readable, we capped the plot at 20 visits, although obviously locations near the originating point experienced many more visits than 20.*

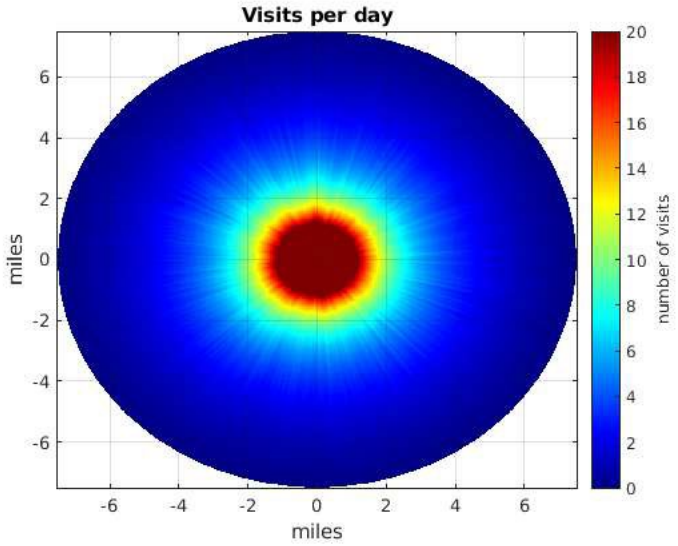


*Figure 1: Average visits per day for drone delivery*

*The results in Figure 1 are disturbing from a privacy standpoint to say the least. Properties within 1 mile of the originating location experience at least 25 visits per day, while properties within 2 miles experience visits an average of 10.5 per day. The operating hours are 7 AM to 10 PM, representing 15 hours of operation. These results indicate average visits ranging anywhere from every 0.6 to 1.4 hours. The problem is much worse closer to the Prime Air Drone Delivery Center (PADDC), i.e. the origin.*

*The simulation is extremely conservative for the following reasons:*

- *We only consider the nadir pointing camera and not the front facing camera. The front facing camera will have its own FOV and most likely be pointing some degrees off nadir. Surveillance of homes from this camera is not considered in the simulation.*
- *The simulation does not consider flightpath restrictions which will make the density of flights much higher in certain parts of the delivery region.*
- *The simulation considers an equal distribution of deliveries. Not all locations will receive packages, with some simply being not eligible for package delivery.*
- *The simulation does not consider other drones (e.g. Wing) in the delivery area.*

*The FAA should require Amazon to provide information regarding the specifications of their cameras and their operation. Once received, the FAA should perform detailed simulations that considers keep out zones (e.g. hospitals with helipads) over the operating region when determining the distribution of overhead flights.*

*At various points in time including the Richardson City Council meeting in which the zoning change for STX-8 was debated and during outreaches with the community through HOA meetings, Amazon has made unverifiable claims regarding the cameras and privacy including the following:*

- *The video footage is only stored for a short period of time on the vehicle. This claim is highly doubtful given the storage capacity of solid-state drives and the invaluable diagnostic information provided by such video to the engineers.*
- *The video footage is not viewed by the operators. This claim is disturbing since it indicates there is no monitoring of the drone during flight.*
- *Customers may request Amazon to blur their properties. This claim is unverifiable -- there is no way to determine if a property has been blurred, nor is there a definition of exactly what that means.*

*Although the FAA may deem privacy concerns as not an "environmental impact", I do believe it introduces a psychological impact that should be considered in the environmental assessment. Furthermore, whether or not it is addressed by the FAA, it should be addressed by some agency of the US government to ensure the US population's privacy is not further infringed upon, especially in an application such as drone delivery where there is no "opt out" choice in terms of preventing flight over one's property.*

**[D]** *4 PSYCHOLOGICAL IMPACT*

*Nowhere in the environmental assessment report is there any consideration regarding the psychological impact on residents due to overhead drones. The "Wired" magazine article referenced in Section 2 describes the psychological impact on College Station residents, including one who no longer wanted to use their own outdoor pool. Drones are constantly in the news with respect to the conflicts in Ukraine and Gaza, where they are used to inflict significant devastation. One can only wonder the impact of commercial drones constantly flying overhead to a veteran with posttraumatic stress disorder (PTSD).The damage that could be inflicted by an 83-lb drone that encounters a mechanical failure is not to be taken lightly and is a source of concern. Noise, personal security, and privacy are all areas in which drone delivery provides a negative impact on the mental health of the population.*

*5 CONCLUSION*

*I find real no advantages to drone delivery when it comes to the environmental impact to the community. In both the FAA EA and the Richardson City Council meeting on STX-8 zoning change, arguments were made that drones are "environmentally friendly" since they operate on battery and reduce the number of vehicles on the road. This argument dubious at best. At the STX-8 site, Amazon has previously provided its employees gas-powered Kia vehicles to conduct deliveries, although recent news indicates they may be discontinuing this option. There is nothing to prevent Amazon from supplying electric vehicles to their employees or leasing such vehicles and installing charging stations at the facility. A drone delivery is a single back-and-forth flight of a package up to 5 pounds to a single residence. Compare that to an electric vehicle that could store multiple packages and deliver to multiple locations during a single trip with a relatively low carbon footprint.*

*As described in the previous sections of this document, noise, privacy, and psychological impact of drone delivery are unacceptable and not adequately addressed in the EA. The FAA should take the "no action alternative" and deny Amazon's drone delivery service, especially at the STX-8 location.*

## FAA Response – 07_ Zogakis

Thank you for your comments.

**[A]** Associations between aviation noise and disruption to normal activity are key components in the establishment of FAA's residential noise impact thresholds defined in FAA Order 1050.1F. Use of the DNL 65 dB as the threshold for significant noise exposure is designed to account for sleep disturbance, speech interference, and annoyance among other factors. For additional information, please refer to *Topic Specific Response 4: Noise Metrics*.

**[B]** For a discussion of the cumulative noise exposure from Amazon's proposed operations with those of other drone operators and aviation noise sources, please refer to *Topic Specific Response 8: Reasonably Foreseeable Effects.*

**[C]** Please refer to *Topic Specific Response 5: Privacy*.

**[D]** Please refer to *Topic Specific Responses 1: Safety, 6: Quality of Life, and 7: Health Effects of Noise*.

## Public Comment – 08_CoSM

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

*On behalf of the City of San Marcos, Texas, we respectfully submit the following comments regarding the Draft Environmental Assessment (EA) prepared by the Federal Aviation Administration (FAA) for Amazon.com Services LLC, doing business as Amazon Prime Air (Amazon Prime Air), and its proposed expansion of commercial drone package delivery operations in Texas.*

*The City of San Marcos supports the responsible development of innovative technologies and recognizes the potential benefits of drone delivery services, including efficiency, sustainability, and economic opportunity. However, as currently outlined, the Draft EA raises several concerns listed below that we believe warrant further consideration. These concerns address the Prime Air Drone Delivery Center (PADDC) located at Amazon's SAT2 facility located at 1401 East McCarty Lane, San Marcos, Texas. [As described on page 1-4 of the Draft EA, the proposed SAT2 PADDC is an Amazon Robotics Fulfillment Center. SAT2 is zoned Heavy Industrial District (HI), which is intended to accommodate a broad range of high impact manufacturing or industrial uses that by their nature create a nuisance, and which are not properly associated with or are not compatible with nearby residential or commercial uses. SAT3 (2?) is located southwest of Interstate 35 with nearby uses that include a hotel, U.S. Army Reserve Outpost, and other commercial and industrial uses. The nearest residential development is 0.33 miles south of the site.]*

1. **[A]** ***Noise Impacts***
    - *Residents and hotel guests located near proposed flight paths, delivery zones, or operations centers could be affected by drone noise, especially during take-off and landing.*
2. ***Operational Hours & Flight Frequency***
    - *Flights could disrupt residential neighborhoods, particularly during evenings and weekends.*
    - *We recommend that the FAA limit operational hours until noise reduction efforts are demonstrated and effective.*
3. **[B]** ***Zoning & Land Use Compatibility***
    - *Depending on final facility location, drone operations may conflict with zoning districts designed to ensure compatibility with residential and commercial areas.*
    - *The City requests a comprehensive review of land use impacts, including compatibility with current zoning designations and adjacent hotel, conference center and residential neighborhoods.*
4. **[C]** ***Environmental and Wildlife Impacts***
    - *The Draft EA should provide additional analysis of impacts to wildlife, particularly migratory birds, and outline strategies for minimizing potential collisions or disturbances to sensitive habitats.*
5. **[D]** ***Airspace & Public Safety***
    - *Increased drone traffic raises risks of conflicts with other low-altitude airspace users, including emergency medical helicopters and general aviation, especially given the proximity of the San Marcos Regional Airport.*
    - *We recommend clear coordination with local public safety agencies and regional airports to mitigate risks and ensure safe airspace integration.*
6. **[E]** ***Traffic and Infrastructure Impacts***
    - *While drone operations may reduce some delivery vehicle traffic, supporting facilities could increase ground traffic, parking demand, and infrastructure strain in surrounding areas.*
    - *The Draft EA should evaluate these potential secondary impacts.*
7. ***Community Engagement***
    - **[F]** *Residents deserve transparency regarding proposed operations, potential impacts, and mitigation efforts. We recommend that Amazon and the FAA host public information sessions in San Marcos and provide ongoing channels for community feedback.*
    - **[G]** *Information should be provided to the community regarding drone reliability and the potential risks of hardware and software failures.*
    - **[H]** *Drone delivery operations inherently involve handling customer data such as delivery addresses and potentially other personal identifiable information (PII). It is critical that strict safeguards be in place to protect resident privacy and ensure compliance with data protection standards.*

*In summary, while the City of San Marcos supports technological advancement and is open to exploring opportunities for drone package delivery, we respectfully ask that the FAA address these concerns in the Final EA before granting approval.*

*Thank you for the opportunity to provide comments. Please contact us if additional information or clarification is needed.*

*Joe Pantalion, PE*
*Assistant City Manager | City Manager's Office*
*630 E Hopkins, San Marcos, TX 78666*

## FAA Response – 08_CoSM

Thank you for your comments.

**[A]** As detailed in Section 3.6 and the Technical Noise Report found in Appendix E of the EA, the Proposed Action is not expected to generate noise levels that exceed the threshold of significance (DNL 65 dB) at the nearest noise sensitive location or result in a DNL 1.5 dB or greater increase at a noise sensitive area already exposed to aviation noise levels of DNL 65 dB or newly expose a noise sensitive area to DNL 65 dB. For more information on the noise exposure analysis please refer to *Topic Specific Response 3: Noise Exposure*.

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

The FAA does not select the locations for commercial drone operators to conduct operations. Those locations are selected by the operators. Land use and zoning are typically governed by state and local laws. Operators are responsible for complying with any such applicable laws relevant to establishing their operations. Operators are expected to site their distribution hubs in accordance with all local land use ordinances and zoning requirements.

**[C]** Please refer to *Topic Specific Response 2: Biological Resources*.

**[D]** Please refer to *Topic Specific Response 1: Safety*.

**[E]** The Proposed Action would not result in any further construction of facilities that would be associated with road traffic or infrastructure. Furthermore, the MK30 drone would be used to replace existing automobile/truck trips to deliver small goods and would not induce increased demand that would

contribute to increased truck or roadway traffic. Thus, the Proposed Action is not expected to increase road traffic at PADCC locations or surrounding areas.

**[F]** As required by FAA Order 1050.1F, the FAA initiated a number of actions to inform and engage the public and potentially interested regulatory agencies about the Proposed Action, which include:

- Agency coordination/consultation/notification, to include the Texas SHPO, USFWS, city government officials, local political representatives, and local officials with jurisdiction over Section 4(f) properties or resources
- Native American/Tribal consultation
- Public review and comment period of 30 days (subsequently extended to 48 days)

The FAA provided a NOA of the Draft EA on August 15, 2025, to local interest groups, local government officials, public park authorities, and the SHPO, tribes and THPOs. The complete list of NOA distribution can be found in Appendix A-1 of the EA. On the same date, the FAA made the Draft EA available to the general public on the FAA website.

All communications and consultations between the FAA and the abovementioned stakeholders are documented in the following appendices of the EA:

- Appendix B – Biological Resources and Agency Consultation
- Appendix C – Section 4(f) Resources
- Appendix D – Section 106 Resources and Agency Consultation

The FAA is not required to hold public meetings and will only hold public meetings or workshops when appropriate. The FAA considered the nature of the Proposed Action and magnitude of impacts as described in the Draft EA consistent with the guidance described in Chapter 2.5.3 of FAA Order 1050.1F and determined that public meetings were not appropriate.

In parallel with the public comment and review period for the draft EA and after conclusion of the NEPA process, it is important for Prime Air and local governments to continue to engage the local community for concerns related to drone operations. Drone package delivery operations require local approvals in addition to the FAA's airspace authorization. The siting of Prime Air's PADCCs and associated drone delivery infrastructure are subject to applicable state and local land use and zoning requirements. As such, the FAA does not select the locations for Prime Air to conduct operations, and Prime Air is responsible for complying with any such applicable laws relevant to commencing and continuing their operations and includes any state or local requirements for conducting public outreach or meeting specific reporting requirements. As such, the FAA encourages state and local governments, and the public, to engage with Prime Air directly for any concerns or requests related to Prime Air's drone operations. Requests or concerns may be relayed to Prime Air via email at amazondronefeedback@amazon.com or by calling 888-283-0587.

**[G]** Please refer to *Topic Specific Response 1: Safety*.

**[H]** Please refer to *Topic Specific Response 5: Privacy*.

# Public Comment – 09_SATX

*Attached please find our signed letter of support for the Prime Air Texas DRAFT EA.*

*The letter reads as follows:*

*September 30, 2025*

*RE: Prime Air Texas Draft EA*

*Dear Federal Aviation Administration,*

*On behalf of our more than 200 private sector investors and public partners in the 10-county San Antonio region, greater:SATX Regional Economic Partnership, is pleased to support Amazon's planned Prime Air Drone Delivery in Texas and respectfully asks the Federal Aviation Administration to approve the project.*

*This project is an economic driver for our community as it will retain and create new jobs at the Amazon facilities in San Antonio, Texas listed in the Draft Environmental Assessment and across the state.*

*We appreciate the continued investment Amazon is making in our community. Through facility operations, expansions, and, via the deployment of new technology such as drone delivery via Amazon Prime Air, these investments are supporting over 6,000 jobs for local residents. To date, Amazon has invested over $3 billion in our community, increasing the tax base for our local taxing jurisdictions, funding schools, city and county budgets, emergency services, and other public operations.*

*Additionally, Amazon is supporting workforce programs in our community to help build the talent pipeline of future workers. Amazon supports greater:SATX-led experiential learning opportunities for high school students by participating in Job Shadow Day to feature the career pathways in transportation, logistics and management. Furthermore, Amazon is partnering with our local community college district to support new job training programs that will lead to high paying jobs as drone operators.*

*We look forward to Amazon receiving FAA approval of this project that would enable continued growth of the company in our community.*

*Sincerely,*

*Romanita Matta-Barrera*
*Chief Business Advancement Officer*

*Sarah Morales*
*Senior Vice President*
*Business Engagement*
*a 112 E Pecan St. #2635, San Antonio, TX 78205*
*c 210.464.6084*
*o 210.802.2623*

## FAA Response – 09_ SATX

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

## Public Comment – 10_ACD

*Good morning,*

*Please find attached the Public Comment from the Alamo Colleges District in San Antonio, Texas in support of the Prime Air Texas Draft EA.*

*If you should have any questions please don't hesitate to contact me at pcamacho5@alamo.edu.*

*Thank you.*

*With thanks,*

*Priscilla*

*Priscilla D. Camacho, J.D.*
*Chief Legislative, Industry & External Relations Officer*
*Office of the Chancellor*
*Alamo Colleges District*
*2222 N. Alamo | San Antonio, TX 78215*
*210- 326-3751 (Cell) | pcamacho5@alamo.edu*

*(Transcript of email attachment follows)*

*September 30, 2025*

*Federal Aviation Administration*
*800 Independence Avenue, SW*
*Washington, DC 20591*
*Via Email: 9-FAA-Drone-Environmental@faa.gov*

*RE: Prime Air Texas Draft EA*

*To Whom it May Concern,*

*On behalf of the Alamo Colleges District, one of the largest talent providers in South Texas, we are pleased to support Amazon's planned Prime Air Drone Delivery in Texas and respectfully ask the Federal Aviation Administration to approve the project.*

*The Prime Air Drone Delivery project is an economic driver for our community as it will retain and create new jobs at the Amazon facilities in San Antonio, Texas listed in the Draft Environmental Assessment and across the state. We are especially pleased to see the continued investment and expansion of workforce opportunity in the eastside of San Antonio.*

*This expansion is also a demonstration of the commitment by Alamo to continue investing in the region. Through facility operations, expansions, and, via the deployment of new technology such as drone delivery via Amazon Prime Air, these investments are supporting over 6,000 jobs for local residents. To date, Amazon has invested over $3 billion in our community, increasing the tax base for our local taxing jurisdictions, funding schools, city and county budgets, emergency services, and other public operations.*

*Additionally, Amazon is supporting workforce programs in our community to help support a pathway for future workers in a variety of career pathways now to include drone technology. Amazon supports greater:SATX led experiential learning opportunities for high school students in critical career pathways that includes transportation, logistics and management. Furthermore, Amazon has been a critical partner for the Alamo Colleges enabling us to be a Career Choice provider for current Amazon employees, partnering to provide AWS certifications in cloud computing, and supporting a new job training program that will lead to high-wage jobs as drone operators.*

*We proudly support Amazon's request and look forward to them receiving FAA approval for this project.*

*If you should have any questions regarding this comment, please don't hesitate to contact me at rflores@alamo.edu*

*With thanks,*

*Dr. Mike Flores*
*Chancellor*

## FAA Response – 10_ACD

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

## Public Comment – 11_CoHV

*The City of Hedwig Village is against using drones to deliver packages. This is due to the noise that drones generate, the many trees we have in our community will make delivery difficult, if not impossible.*

*Please let me know if you have any questions or need addtl comments.*

*Thank you for the opportunity for comments.*

*Wendy Baimbridge*
*City Administrator*
*City of Hedwig Village*
*955 Piney Point Road*
*Hedwig Village, TX 77024*
*713/600-7373*

# FAA Response – 11_CoHV

Thank you for your comments. As detailed in Section 3.6 and the Technical Noise Report found in Appendix E of the EA, the Proposed Action is not expected to generate noise levels that exceed the threshold of significance (DNL 65 dB) at the nearest noise sensitive location or result in a DNL 1.5 dB or greater increase at a noise sensitive area already exposed to aviation noise levels of DNL 65 dB or newly expose a noise sensitive area to DNL 65 dB. For more information on the noise exposure analysis please refer to *Topic Specific Response 3: Noise Exposure*.