

Appendix G

Coastal Resources

CONSISTENCY WITH THE TEXAS COASTAL MANAGEMENT PROGRAM

THE APPLICANT SHOULD SIGN THIS STATEMENT AND
RETURN WITH APPLICATION PACKET TO:

TEXAS GENERAL LAND OFFICE
COASTAL RESOURCES-FEDERAL CONSISTENCY
1700 NORTH CONGRESS AVENUE, ROOM 330
AUSTIN, TEXAS 78701-1495
federal.consistency@glo.texas.gov

FOR USACE USE ONLY:

PERMIT #: _____

PROJECT MGR: _____

APPLICANT'S NAME AND ADDRESS (PLEASE PRINT):

Title First Last Suffix

Mailing Address Home

City State Zip Code Work

Country Email Mobile

Fax

The Texas Coastal Management Program (CMP) coordinates state, local, and federal programs for the management of Texas coastal resources. Activities within the CMP boundary must comply with the enforceable policies of the Texas Coastal Management Program and be conducted in a manner consistent with those policies. The boundary definition is contained in the CMP rules (31 TAC §27.1).

- To determine whether your proposed activity lies within the CMP boundary, please contact GLO Federal Consistency Staff at federal.consistency@glo.texas.gov

PROJECT DESCRIPTION:

Is the proposed activity at a waterfront site or within coastal, tidal, or navigable waters? ☒ Yes ☐ No

If Yes, name affected coastal, tidal, or navigable waters:

Is the proposed activity water dependent? ☐ Yes ☒ No (31 TAC §26.3(a)(14))

<https://tinyurl.com/TXCMPdefinitions>

Please briefly describe the project and all possible effects on coastal resources:

Amazon Prime Air is proposing to conduct commercial drone delivery operations at 22 locations across Texas. The drones would take off from and land at previously constructed Prime Air Drone Delivery Centers (PADDs). Only one PADD, STX4, would operate drones in the footprint of the Coastal Management Program Area. When out for delivery, the drones would fly between 180 and 377 feet, then hover at about 13 feet above ground level, and drop the package to the ground to the customer. The drones would not touch land anywhere except when at the PADD for battery charging and package loading. Except when hovering for delivery, the drones would fly at about 60 mph and would only be visible for less than four seconds to an observer on the ground. Drones operating from the STX4 PADD would conduct delivery operations to populated areas in the Houston metro area, which could include the shoreline of Galveston Bay, but deliveries are not expected over bodies of water. More details about the Proposed Action and the environmental analysis can be found in the Draft Environmental Assessment posted here: https://www.faa.gov/uas/advanced_operations/nepa_and_drones

Indicate area of impact: ☒ acres or ☐ square feet

ADDITIONAL PERMITS/ AUTHORIZATIONS REQUIRED:

- ☐ Coastal Easement - Date application submitted: _____
- ☐ Coastal Lease - Date application submitted: _____
- ☐ Stormwater Permit- Date application submitted: _____
- ☐ Water Quality Certification - Date application submitted: _____
- ☒ Other state/federal/local permits/authorizations required: _____

The Proposed Action will require an amendment to Prime Air's existing Part 135 Operations Specifications, which is considered a federal action; as such, a NEPA review, in accordance with FAA Order 1050.1F, is required.

The proposed activity must not adversely affect coastal natural resource areas (CNRAs).

PLEASE CHECK ALL COASTAL NATURAL RESOURCE AREAS THAT MAY BE AFFECTED:

- | | | |
|--|---|---|
| <input type="checkbox"/> Coastal Barriers | <input type="checkbox"/> Critical Erosion Areas | <input type="checkbox"/> Submerged Lands |
| <input checked="" type="checkbox"/> Coastal Historic Areas | <input type="checkbox"/> Gulf Beaches | <input type="checkbox"/> Submerged Aquatic Vegetation |
| <input type="checkbox"/> Coastal Preserves | <input type="checkbox"/> Hard Substrate Reefs | <input type="checkbox"/> Tidal Sand or Mud Flats |
| <input type="checkbox"/> Coastal Shore Areas | <input type="checkbox"/> Oyster Reefs | <input type="checkbox"/> Waters of Gulf of Mexico |
| <input type="checkbox"/> Coastal Wetlands | <input type="checkbox"/> Special Hazard Areas | <input type="checkbox"/> Waters Under Tidal Influence |
| <input type="checkbox"/> Critical Dune Areas | | |

The applicant affirms that the proposed activity, its associated facilities, and their probable effects comply with the relevant enforceable policies of the CMP, and that the proposed activity will be conducted in a manner consistent with such policies.

PLEASE CHECK ALL APPLICABLE ENFORCEABLE POLICIES:

<https://tinyurl.com/TXCMPpolicies>

<input checked="" type="checkbox"/>	§26.15 Policy for Major Actions
<input type="checkbox"/>	§26.16 Policies for Construction of Electric Generating and Transmission Facilities
<input type="checkbox"/>	§26.17 Policies for Construction, Operation, and Maintenance of Oil and Gas Exploration and Production Facilities
<input type="checkbox"/>	§26.18 Policies for Discharges of Wastewater and Disposal of Waste from Oil and Gas Exploration and Production Activities
<input type="checkbox"/>	§26.19 Policies for Construction and Operation of Solid Waste Treatment, Storage, and Disposal Facilities
<input type="checkbox"/>	§26.20 Policies for Prevention, Response and Remediation of Oil Spills
<input type="checkbox"/>	§26.21 Policies for Discharge of Municipal and Industrial Wastewater to Coastal Waters
<input type="checkbox"/>	§26.22 Policies for Nonpoint Source (NPS) Water Pollution
<input checked="" type="checkbox"/>	§26.23 Policies for Development in Critical Areas
<input checked="" type="checkbox"/>	§26.24 Policies for Construction of Waterfront Facilities and Other Structures on Submerged Lands
<input type="checkbox"/>	§26.25 Policies for Dredging and Dredged Material Disposal and Placement
<input checked="" type="checkbox"/>	§26.26 Policies for Construction in the Beach/Dune System
<input checked="" type="checkbox"/>	§26.27 Policies for Development in Coastal Hazard Areas
<input checked="" type="checkbox"/>	§26.28 Policies for Development Within Coastal Barrier Resource System Units and Otherwise Protected Areas on Coastal Barriers
<input checked="" type="checkbox"/>	§26.29 Policies for Development in State Parks, Wildlife Management Areas or Preserves
<input checked="" type="checkbox"/>	§26.30 Policies for Alteration of Coastal Historic Areas
<input type="checkbox"/>	§26.31 Policies for Transportation Projects
<input checked="" type="checkbox"/>	§26.32 Policies for Emission of Air Pollutants
<input type="checkbox"/>	§26.33 Policies for Appropriations of Water
<input type="checkbox"/>	§26.34 Policies for Levee and Flood Control Projects

Please explain how the proposed project is consistent with the applicable enforceable policies identified above. Please use additional sheets if necessary. *For example: If you are constructing a pier with a covered boathouse, then the applicable enforceable policy is: §26.24 Policies for Construction of Waterfront Facilities and Other Structures on Submerged Lands. The project is consistent because it will not interfere with navigation, natural coastal processes, and avoids/minimizes shading.*

§26.15 - The FAA has determined that the potential environmental impacts associated with the Proposed Action do not meet the statutory significance thresholds requiring an Environmental Impact Statement, as defined by NEPA and related statutes, and FAA Order 1050.1F.

§26.23, §26.24, §26.26, §26.27, §26.28 - The Proposed Action includes the operation of commercial delivery drones from the STX4 PADDCC located at 10611 Red Bluff Road, Pasadena, TX 77507. The proposed STX4 PADDCC facility currently serves as an existing distribution/logistics facility for Amazon. The Proposed Action does not involve the construction of any new or alteration of any existing infrastructure.

§26.29 - The Proposed Action would not cause substantial impairment, or direct or constructive use of any resources, as defined by Section 4(f) of the Department of Transportation Act, because the drones would not directly interact with any resources on the ground and the associated noise levels would not result in substantial impairment to any properties.

§26.30 - After departing the STX4 PADDCC, the drone would fly to its delivery destination at between 180 and 279 feet. At the delivery location, the drone would descend to about 13 feet, stop, and drop the package to the customer. The drone would then ascend and fly back to the PADDCC at between 279 and 377 feet. The drone would operate at about 60 mph during flight. To an observer on the ground, the drone would be visible for less than 4 seconds. The delivery process at the customer location (descend, hover, ascend) would last less than one minute. The FAA consulted with the Texas Historical Commission, which concurred that the Proposed Action would have "no adverse effect" on any listed or eligible resources under Section 106 of the National Historic Preservation Act.

§26.32 - The drones would be electrically powered and operate on batteries. Although Harris County is designated as nonattainment by the US EPA, the minimal emissions associated with the Proposed Action (charging drone batteries) would be unlikely to contribute to any exceedance of National Ambient Air Quality Standards.

Accordingly, the FAA has determined that the Proposed Action is consistent with the goals of the Texas Coastal Management Program, as described in 31 TAC § 26.12, and all associated policies (31 TAC § 26.12 - § 26.34).

BY SIGNING THIS STATEMENT, THE APPLICANT IS STATING THAT THE PROPOSED ACTIVITY COMPLIES WITH THE TEXAS COASTAL MANAGEMENT PROGRAM AND WILL BE CONDUCTED IN A MANNER CONSISTENT WITH SUCH PROGRAM

Joseph K. Hemler Jr

Digitally signed by Joseph K. Hemler Jr
Date: 2025.07.15 14:50:47 -04'00'

Signature of Applicant/Agent

Date

Any questions regarding the Texas Coastal Management Program should be referred to:

Texas General Land Office
Coastal Resources Division
1700 North Congress Avenue, Room 330
Austin, Texas 78701-1495
Phone: (512) 463-7497
Toll Free: 1-800-998-4GLO
federal.consistency@glo.texas.gov

Print Form



TEXAS GENERAL LAND OFFICE
COMMISSIONER DAWN BUCKINGHAM, M.D.

December 29, 2025

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

**Re: Conduct commercial drone delivery operations at existing Prime Air Drone
Delivery Center STX4
10611 Red Bluff Road, Pasadena, Harris County, Texas
CMP#: 25-1271-F1**

Dear Applicant:

The project referenced above has been reviewed for consistency with the Texas Coastal Management Program (CMP) pursuant to 31 Texas Administrative Code §30.30. It has been determined that the project, as proposed, is consistent with the CMP goals and enforceable policies.

Please note that this letter does not authorize the use of Coastal Public Land. No work may be conducted or structures placed on State-owned land until you have obtained all necessary authorizations, including any required by the General Land Office and the U.S. Army Corps of Engineers.

If you have any questions or concerns, please contact me at (512) 463-7497 or at federal.consistency@glo.texas.gov.

Sincerely,

Leslie Koza
Federal Consistency Coordinator
Texas General Land Office