

## **Draft Environmental Assessment – Drone Delivery Operations Over Frisco and Little Elm, Texas**

### **Comments of Small UAV Coalition**

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filed with [9-FAA-Drone-Environmental@faa.gov](mailto:9-FAA-Drone-Environmental@faa.gov)

The Small UAV Coalition (“Coalition”) is pleased to provide comments in support of the FAA’s draft Environmental Assessment (“EA”) of Wing’s proposed drone delivery operations from two locations in the Dallas-Ft. Worth metro area to residences and commercial businesses. FAA explains that it is required to perform a review under the National Environmental Policy Act (“NEPA”) in order to amend Wing’s Operations Specifications (“OpSpecs”) for its Part 135 drone delivery operations in particular locations.

The Coalition has reviewed the draft EA and supporting information and agrees the noise impacts are well below the threshold of significance, using standard and supplemental noise metrics. The Coalition also agrees with the draft EA’s conclusion that there are no other significant impacts from these operations in the many areas required to be reviewed. Accordingly, the Coalition supports the FAA’s issuance of a Finding of No Significant Impact (“FONSI”).

In particular, the Coalition notes the draft EA’s conclusion that Wing’s battery-powered drone has no air quality, climate, or noise impact.

This draft EA addresses Wing’s drone, concept of operations (“Con Ops”), and particular locations in the Dallas-Ft. Worth metro area. The Coalition recommends that the FAA move beyond individualized circumstances and apply a programmatic approach to drone noise impacts and operating parameters (e.g., weight, speed, altitude, and Con Ops) that will not materially differ from one location to another. Multiple individual EAs are unnecessary and costly and expose FAA and the industry to repetitive challenge and risk of litigation.

While the Coalition concurs with FAA’s ultimate result, it questions whether the same conclusions could not have been arrived at through use of the established

Categorical Exclusion (“CATEX”) process. The CATEX process is commonly applied to OpSpec issuance and amendments relating to air carriers. The CATEX process affords predictability and flexibility, including through consideration of potential extraordinary circumstances, and could be supplemented and updated as necessary to address drone-specific actions.

Respectfully submitted,



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