



**SMALL UAV
COALITION**
*A Partnership for
Safety & Innovation*

Draft Environmental Assessment – Wing Aviation, LLC

Drone Package Delivery Operations in Dallas-Fort Worth Metropolitan Area

Comments of Small UAV Coalition

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filed with 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 Aviation, LLC’s proposed drone delivery operations in the Dallas-Ft. Worth metro area to residences and commercial businesses. FAA states that it must amend Wing’s Operations Specifications (“OpSpecs”) to authorize Wing to conduct its Part 135 drone delivery operations, beyond those previously authorized through a Finding of No Significant Impact (“FONSI”) in the Frisco and Little Elm areas in 2022, to authorize up to 25 nests in the greater Dallas-Fort Worth metro area. The FAA has determined that a revision of Wing’s OpSpecs is a major federal action under the National Environmental Policy Act (“NEPA”).

Wing seeks to expand its existing operations in the DFW metropolitan area, building on its demonstrated record of safe and reliable operations. Wing will operate its Hummingbird 7000W-B drone, which has a quieter en route noise profile than the 7000W-A model. The FAA has decided to use the more conservative 7000W-A in analyzing noise impacts in this draft EA. The Hummingbird has software to avoid flying over schools and outdoor daycare facilities.

Wing will operate its drone delivery operations during the day and operate at least 300 feet from “noise-sensitive areas” in Class B and D airspace, and at least 75 feet from such areas in other airspace. Nests will be located in parking lots in commercial areas, such as shopping centers, shopping malls, and large retail stores.

At the outset, the Coalition supports the FAA’s conclusion in this draft EA and previous EAs authorizing drone operations that no detailed analysis is necessary for ten of the 17 environmental review areas. The Coalition also supports the FAA’s determination that there is no significant impact on biological resources, section 4(f) resources, historic properties, noise, environmental justice, visual impacts, and cumulative impacts. The Coalition agrees with the draft EA’s statement that drone operations will bring environmental justice benefits over operations that require a car or truck to pick up a package from a store. The short duration and low number of overflights also support the finding of no significant impact in these areas.

The Coalition has reviewed the noise impacts analysis in the draft EA and supporting information and agrees the noise impacts are well below the DNL 65 threshold of significance. While operations at a nest may approach DNL 65, nests are located in parking lots and Wing’s commitment to locate its nests away from noise sensitive areas results in noise impacts well under DNL 65. The noise impacts during en route and delivery operations are considerably lower, well under DNL 50.

Accordingly, the Coalition supports the draft EA and urges the FAA to issue a FONSI.

While this draft EA addresses Wing’s drone, concept of operations (“Con Ops”), and location of operations, 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.

Respectfully submitted,

Gregory S. Walden

Small UAV Coalition

gregory.walden@dentonsglobaladvisors.com

202-403-9904