

Small UAV Coalition comments
Federal Aviation Administration Draft Environmental Assessment
Amazon Prime Air Delivery Operations from Prime Air Drone Delivery Center
In College Station, Texas
Filed in 9-FAA-Drone-Environmental@faa.gov

The Small UAV Coalition (“Coalition”) is pleased to submit these comments in support of the FAA’s draft Environmental Assessment (“EA”) and recommends the FAA issue a Finding of No Significant Impact (“FONSI”) promptly after consideration of the public comments.

The Coalition recommends that the FAA develop clear and transparent drone-specific guidance on compliance with the National Environmental Policy Act (“NEPA”) to inform its environmental reviews such as this one, to consider the development of a broad and high level programmatic environmental assessment, and to gather data to determine certain operations and operational environments that would qualify for a categorical exclusion.

Commercial delivery by drone will result in quick and safe delivery of a variety of products that will benefit both businesses and the public. Amazon Prime Air’s delivery of packages up to 5 pounds using its MK27-2 battery-powered drone will obviate the use of carbon-emitting ground vehicles, whether by a customer driving to a business or a business that delivers goods to a residence. Apart from its environmental benefits, drone operations have the potential to reduce the number of vehicles on the road and thereby improve road safety.

Amazon seeks an amendment to its Part 135 Operations Specifications (“Op Specs”) to conduct flight operations from its Prime Air Drone Delivery Center (“PADDC”) to destinations within a four-mile radius. This Op Specs amendment is the Federal action triggering review under the National Environmental Policy Act (“NEPA”). These flights will be distributed among four sectors. Flights will be conducted during daylight hours, thereby eliminating the risk of any sleep disturbance, and flown up to five days per week. Amazon pledges to avoid operations over schoolyards during operational hours and will avoid operating over any large open-air assembly of persons.

The Coalition agrees with the FAA’s conclusion that nine of the fourteen areas of evaluation of environmental impacts do not warrant any detailed consideration and expects the FAA will be able to make this same determination with respect to other drone operations unless the particular location or nature of operation implicates one of those nine areas.

For the noise impacts, the FAA examined noise at three stages: the PADDCC; en route while the drone will operate between 160 and 180 feet Above Ground Level (“AGL”); and at the point of delivery, when the drone descends to about 13 feet AGL. Using its DNL metric, the draft EA concludes that at no point will the noise exceed 57.2 dB, except within a 100 feet radius from the PADDCC, which area is entirely on Amazon Prime Air’s property. Otherwise, the highest noise levels will be at delivery, but the maximum number of deliveries per day at one point will not exceed four. During the delivery route, the noise will at no point exceed 45 dB. It is worth noting that delivery locations will be chosen by the person or business requesting the delivery, although other individuals may be nearby. The draft EA states: “The maximum noise exposure at any property line in residential zoned property will not exceed 50 dB.”

With respect to section 4(f) resources, the Coalition agrees with the FAA’s conclusion that “infrequent UAS overflights . . . are not a constructive use of any section 4(f) resource, and will not cause any substantial impairment to any of the section 4(f) resources in this area.”

With respect to visual impacts, the Coalition agrees that a drone that is seen only up to 3.6 seconds at any point is not likely to have any significant visual impact.

In sum, the Coalition agrees with the findings in the draft EA and urges the FAA to issue a FONSI after it considers comments from the public.

Respectfully submitted,



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For the Small UAV Coalition