

**Small UAV Coalition comments**  
**Federal Aviation Administration Draft Environmental Assessment**  
**Zipline International Inc. Delivery Operations from Drone Delivery Nest**  
**In Salt Lake City (UT-1) and Surrounding Area**  
**Filed in [9-FAA-Drone-Environmental@faa.gov](mailto:9-FAA-Drone-Environmental@faa.gov)**

The Small UAV Coalition (“Coalition”) is pleased to submit these comments in support of the above-captioned 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. Zipline’s delivery of packages using its battery-powered Sparrow 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.

Zipline seeks an amendment to its Part 135 Operations Specifications (“Op Specs”) to conduct flight operations from its nest located in a capped landfill area to destinations in 17 communities within three counties within an area of 1,675 square miles. This Op Specs amendment is the Federal action triggering review under the National Environmental Policy Act (“NEPA”). These flights will be distributed roughly evenly among the anticipated service area and conducted prioritizing safety and community consideration.

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 nest; en route while the drone will operate between 130 and 400 feet Above Ground Level (“AGL”); and at the point of delivery, when the drone descends to about 60 feet AGL Using its DNL

metric, the draft EA concludes that at no point will the noise exceed DNL 45.9 dB, except within the vicinity of the next, which is a landfill area. Even so, the noise impact at the next will be “well below the FAA’s significance threshold of DNL 65 dB.” Otherwise, the highest noise levels will be at delivery, but the average number of deliveries per day to any community will not exceed two. During the delivery route, the noise will at no point exceed DNL 45.9 dB, and in fact would not be approach DN 45 dB until daily operations at one location exceed five hundred.

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 would not cause any substantial impairment to any of the section 4(f) resources in the study area.”

With respect to visual impacts, the Coalition agrees that a drone that is seen only up to 6 seconds from a height above trees and power lines at any point is not likely to have any significant visual impact, and in any event be similar to the sight of legacy aircraft in the area (several airports are in the study area).

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*