



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

Draft Environmental Assessment – Causey Aviation Unmanned, Inc.

Drone Package Delivery Operations in DFW Metro 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”) for drone package delivery operations by Causey Aviation Unmanned, Inc. (“Causey”) in the Dallas-Ft. Worth, Texas metropolitan area. The “major federal action” triggering review under the National Environmental Policy Act (“NEPA”) is the FAA’s amendment of an air carrier’s Operations Specifications (“OpSpecs”).

In 2023, the FAA issued a Record of Decision (“ROD”) and Finding of No Significant Impact (“FONSI”) to Causey for operations in Granbury (77 daily flights) and Rowlett (71 daily flights), Texas, up to two nautical miles (“NM”) from each distribution center (“DC”), using the Flytrex M600P drone.

This draft EA addresses these locations and two new locations in the DFW metro area – Frisco and Little Elm, and North Richland Hills – and up to 30 additional distribution centers over the next three years, performing up to total of 500 operations per day. Each DC will have charging pads for up to 20 drones. Causey also seeks to add the Flytrex Sky II platform, weighing 34.2 lbs. with a package weight limit of 8.8 lbs., and to extend the radius from each distribution center to 3.5 NM. These flights would operate at 230 feet Above Ground Level (“AGL”) en route, and lower to 75-83 feet AGL for a tethered delivery.

Causey pledges to avoid flying over or near open-air gatherings of people and Section 4(f) resources; to fly at least 150 feet from noise-sensitive areas, where the existing noise impact is 55 DNL and at least 83 feet from an area with an impact of 60 DBL; and to avoid operating near schools.

The Coalition supports the FAA's conclusion in this draft EA as well as in other previous environmental assessments authorizing drone package delivery operations that no detailed analysis is necessary for nine of the 17 environmental review areas:

- air quality and climate
- coastal resources
- farmlands
- hazardous materials, solid waste, and pollution prevention
- land use
- natural resources and energy supply
- socioeconomic impacts and children's environmental health and safety risks
- visual effects
- water resources (wetlands, floodplains, surface waters, and groundwater)

Indeed, drone package delivery will reduce greenhouse gas emissions and energy use, as well as enhance the economy, and serve a broader range of people in different socioeconomic strata or with limited mobility options. Using drones for delivery can potentially replace millions of car trips, which would not only eliminate hundreds of thousands of tons of vehicular CO2 emissions but also reduce traffic congestion and accidents caused by surface transportation. Beyond delivery, drones already offer a safer alternative to critical business and government activities like infrastructure inspection, precision agriculture, and emergency response.

Given these benefits, it is not surprising that an increasing number of counties and localities, including in the Dallas-Ft Worth metropolitan area, have been receptive to drone delivery.

The Coalition supports the FAA's determination that drone delivery operations do not result in a significant impact on noise, visual effects, historic, architectural, archeological, and cultural resources, DOT section 4(f) resources, waters (wild &

scenic rivers), biological resources (wildlife), environmental justice, and cumulative impacts from noise and to biological resources.

The Coalition has reviewed the noise impacts analysis in the draft. The FAA concluded that “any noise increases associated with activity at DCs should not exceed the significance impacts threshold for noise.” Noise impacts for the en route and delivery phases of flight were lower than the impacts at the distribution centers.

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.

Drone package deliveries would provide additional access to small goods, such as groceries and medicine, which could present a positive effect on low-income and minority communities where individuals may not have reliable access to personal vehicles and/or other modes of transportation. For these reasons, the Proposed Action may result in a benefit to low-income and minority communities by providing additional and on-demand access to small goods.

The Proposed Action would not create impacts that exceed thresholds of significance in other environmental impacts, nor would it generate impacts on the physical or natural environment that affect an EJ population in a way that the FAA determines are unique to the EJ population and significant to that population.

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

Respectfully submitted,



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