

Appendix D  
**Section 106 Resources and Agency  
Consultation**

Appendix D-1  
**SHPO Consultation**



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave.,  
SW.  
Washington, DC 20591

Charles C. Horton, MS  
Architectural Historian and Section 106 Reviewer  
Missouri State Historic Preservation Office  
Missouri Department of Natural Resources  
PO Box 176  
Jefferson City, MO 65102

Via electronic submission to: [MOSection106@dnr.mo.gov](mailto:MOSection106@dnr.mo.gov)

**Re: Concurrence with No Adverse Effect to Historic Properties for Commercial Drone Delivery Operations in Missouri**

Dear Mr. Horton:

The Federal Aviation Administration (FAA) is currently evaluating a proposal from Amazon.com Services, doing business as Prime Air, to introduce drone package delivery operations at two locations in the Kansas City metro area. The FAA has determined the proposed action, which requires FAA approvals to enable operations, is an undertaking as defined under the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR § 800.16(y)). The purpose of this letter is to coordinate with the State Historic Preservation Officer (SHPO) and request the SHPO's concurrence on the definitions of each Area of Potential Effects (APE) and the agency's finding of *no adverse effects* associated with the Proposed Undertaking.

**Proposed Undertaking**

Prime Air is seeking authorization to conduct commercial package deliveries using drones at two locations in the Kansas City metro area. Prime Air intends to introduce its drone delivery capabilities in 2025 and has requested the FAA to authorize the operation of its MK30 drone, so it can provide drone package delivery services across each operating area. Prime Air projects flying up to 1,000 MK30 drone flights per operating day from each of the two Prime Air Drone Delivery Centers (PADDCs), with each flight taking a package to a customer delivery address before returning to the PADDC. One of the proposed PADDCs would be located in Missouri (SMO1) and the other would be in Kansas (MKC6). Drone operations from each PADDC are expected to extend outside their respective state (e.g., the Kansas MKC6 PADDC is expected to conduct drone deliveries in Missouri). The number of flights per day would vary based on customer demand and weather conditions. Prime Air is taking an incremental approach to operations and expects to gradually ramp up to 1,000 flights per day as consumer demand increases over time. Drone flights could be conducted up to 365 days a year between 7 A.M. and 10 P.M.

## Unmanned Aircraft

As pictured in **Attachment A**, the Prime Air MK30 drone is a hybrid multicopter fixed-wing tail-sitter drone with six propulsors allowing it to take-off and land vertically and transition to wing borne flight. Its airframe is composed of staggered tandem wings for stable wing-borne flight. The drone weighs approximately 78 pounds and has a maximum takeoff weight of approximately 83 pounds, which includes a maximum payload of 5 pounds. It has a maximum operating range of 7.5 miles and can fly up to about 67 miles per hour (mph) during wing-borne flight. It uses electric power from rechargeable lithium-ion batteries and is launched vertically using powered lift and converts to using wing lift during en route horizontal flight. The MK30 is equipped with collision avoidance technology to help avoid conflicts with other aircraft and drones during flight.

## Flight Operations

The MK30 drone would generally be operated at an altitude between 180 and 377 feet above ground level (AGL). The outbound en route altitude to a delivery location is expected to be flown between 180 and 279 feet AGL. The inbound en route altitude is expected to be flown between 279 and 377 feet back to the PADDCC. At a delivery location, the drone would descend vertically to a stationary hover and drop a package to the ground. Once a package has been delivered, the drone would ascend vertically to the inbound transition altitude and depart the delivery area while climbing to the en route altitude to return to the PADDCC. The PADDCC is a controlled area wherein drone flights are launched and recovered. The drone would fly a predefined flight path that is set prior to takeoff. Flight missions would be automatically planned by Prime Air's flight planning software, which assigns, deconflicts, and routes each flight. In accordance with FAA safety requirements, the drone would avoid operating over areas with dense human populations, such as over roadways, public gathering spots, etc.

A typical drone flight profile can be broken into the following general flight phases: takeoff, en route outbound, delivery, en route inbound, and landing, as depicted in **Attachment B**.

### *Takeoff*

Once a package is loaded onto the MK30 drone and the drone is cleared for departure from the PADDCC, the drone takes off from the ground vertically to an altitude of about 115 feet AGL and then transitions and climbs to its en route altitude of about 200 feet AGL (ranges from 180 and 279 feet AGL). The takeoff phase of flight would last less than one minute.

### *En Route Outbound*

The en route outbound phase is the part of flight in which the MK30 drone transits from the PADDCC to a delivery point on a predefined flight path. During this flight phase, the drone will typically operate at an altitude of 200 feet AGL with a typical airspeed of 67 mph.

### *Delivery*

The delivery phase consists of descent from the en route altitude to a delivery point to deliver a package. The MK30 drone transitions and descends to about 140 feet AGL and then vertically descends to about 13 feet AGL while maintaining position over the delivery point. The drone

hovers while dropping the package and then proceeds to climb vertically back to the inbound transition altitude of 197 feet AGL. The MK30 then transitions and climbs to its en route inbound altitude of 345 feet AGL (ranges from 279 to 377 feet AGL). The delivery phase of flight would last approximately one minute.

#### *En Route Inbound*

The MK30 drone continues to fly at an altitude of about 345 feet AGL with a speed of 67 mph towards the PADDC.

#### *Landing*

The drone decelerates as it approaches the PADDC and descends to the transition altitude of 197 feet AGL and where it transitions from horizontal flight to vertical flight, coming to a zero-speed position over its assigned landing pad. The MK30 drone slowly descends over its assigned landing pad and lands on the pad.

#### Predicted Sound Levels

Based on a noise analysis using sound level measurement data for the MK30 drone, the estimated maximum sound exposure level (SEL) for the takeoff, delivery, and landing phases of flight is approximately 90.5 dB (at 20 feet), 92.1 dB (at 25 feet), and 91.8 dB (at 20 feet), respectively. Predicted sound levels decrease as distances from the drone increase. The maximum SEL for the en route phase is approximately 63.7 dB when the drone is at an altitude of 200 feet AGL and flying at approximately 67 mph.

The drone is generally expected to fly the same outbound flight path between a PADDC and the delivery point and inbound flight path back to the PADDC. While the average daily deliveries from any PADCC is not expected to exceed 1,000, the number of daily overflights will likely be dispersed because the PADCC is centrally located in the delivery area, and delivery locations would be distributed throughout the proposed operating area. A conservative estimate for the maximum number of overflights over any one location is not expected to exceed half of the projected daily deliveries, or 500 deliveries. Since each delivery involves both an outbound and inbound flight path, this equates to 1,000 daily overflights. The resulting Day-Night Average Sound Level (DNL) could reach DNL 43 dB in any location within the APE.

Due to the inherent uncertainty of the exact delivery site locations, the noise analysis developed a minimum and maximum representative distribution of deliveries in the APE. The noise analysis conservatively assumes the minimum and maximum distribution of average daily deliveries that could occur at a single delivery location, which ranges from 1 to 4 deliveries per operating day. The noise for delivery operations also includes outbound and inbound en route overflights at the typical operating altitudes of 200 and 345 feet AGL, respectively, for operations associated with deliveries to other locations. The outbound en route altitude is expected to be flown between 180 and 279 feet AGL. The inbound en route altitude is expected to be flown between 279 and 377 feet AGL back to the PADDC, with the resulting DNL of 52.5 at 16.4 feet.

#### **Area of Potential Effects**

In accordance with 36 CFR § 800.4(a)(1), the FAA has defined each APE in consideration of the undertaking's potential direct and indirect effects. The two proposed APEs are the drone

operating areas associated with each PADDCC, as outlined in red in **Attachment C**. Each APE encompasses approximately 175 square miles and a 7.5-mile drone operating radius around the PADDCC.

### **Identification of Historic Properties**

The proposed undertaking does not have the potential to affect below ground or archaeological resources because it does not include ground disturbance, but may include visual and auditory effects. Therefore, the FAA focused its identification efforts on above-ground historic properties. According to the National Park Service's online database of the National Register of Historic Places (NRHP), 17 historic properties and 1 eligible property are located in the proposed APEs (see **Attachment D**). Additional properties in the proposed APEs may be otherwise recognized for historical significance by the SHPO. Most of the historic properties in the proposed APEs are residences and businesses but also include government buildings and schools. Most of the historic properties are included on the NRHP because of their historic architectural features.

### **Assessment of Effects**

Given the small size of the MK30 drone and predicted sound levels, operations would not produce vibrations that could impact the architectural structure or contents of any structure in the proposed APEs. While the MK30 drone is not expected to generate significant noise levels at or within any historic property, the FAA considered drone delivery noise and potential visual effects on historic properties where a quiet setting or visually unimpaired sky might be a key attribute of the property's significance.

The noise modeling methodology and methods presented in the Draft Environmental Assessment are suitable for the evaluation of Federal actions in compliance with the National Environmental Policy Act (NEPA) and other applicable environmental regulations or federal review standards at the discretion and approval of the FAA. In particular, the analysis is intended to function as a nonstandard equivalent methodology under FAA Order 1050.1F, and therefore, required prior written consent from the FAA's Office of Environment and Energy for each project seeking a NEPA determination. The noise modeling presented above are expressed in terms of the DNL, with consideration of varying levels of operations for areas at ground level below each flight phase.

The FAA has not developed a visual effects significance threshold; however, factors the FAA considers in assessing significant impacts include the degree to which the action would have the potential to: (1) affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources; (2) contrast with the visual resources and/or visual character in the study area; or (3) block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations. The Proposed Undertaking makes no changes to any landforms or land uses, and visual effects would be short-term in nature; thus, there would be no effect to the visual character of the area. Excluding ground-based activities supporting the drones, operations would be occurring in airspace only. The FAA estimates that, at typical operating altitude and speeds, the drone would be observable for approximately 3.6 seconds during en route flight by an observer on the ground.

The FAA has not identified any properties in the proposed APEs that would be affected by the drone's sound levels or visual effects, which are not anticipated to be significant at any locations

along the drone's flight path, including delivery locations. Therefore, the FAA has made a finding of no adverse effects.

### **Conclusion**

The FAA requests your concurrence on the definition of the proposed APE and with the FAA's finding of *no adverse effects* from the Proposed Undertaking. In accordance with Section 106 of the NHPA, the FAA has also initiated consultation with the federally recognized Native American Tribes that may have a potential interest in the Proposed Undertaking, as listed in **Attachment E**.

Your response within the next 30 days will greatly assist us in our environmental review process. In the event that you would like to consult with the FAA about the determination, please contact Christopher Hurst via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov).

Sincerely,

**Joseph K. Hemler Jr** Digitally signed by Joseph K.  
Hemler Jr  
Date: 2025.06.17 08:32:51 -04'00'

Joseph Hemler  
Manager, General Aviation and Commercial Branch (AFS-752)  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service

### Enclosures:

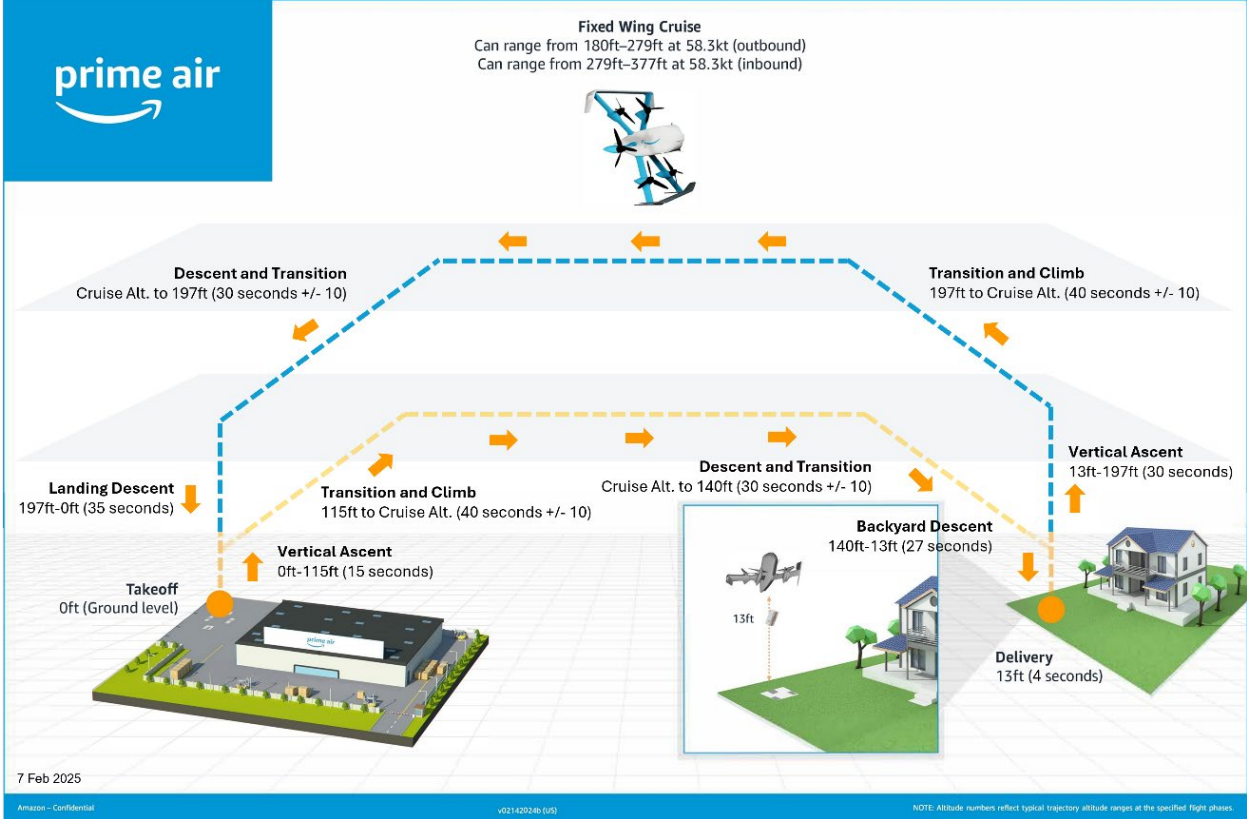
- Attachment A – Amazon Prime Air MK30 Drone
- Attachment B – MK30 Drone Flight Profile
- Attachment C – Proposed Areas of Potential Effects
- Attachment D – Listed and Eligible NRHP Resources
- Attachment E – Consulted Parties

**Attachment A**  
**Amazon Prime Air MK30 Drone**



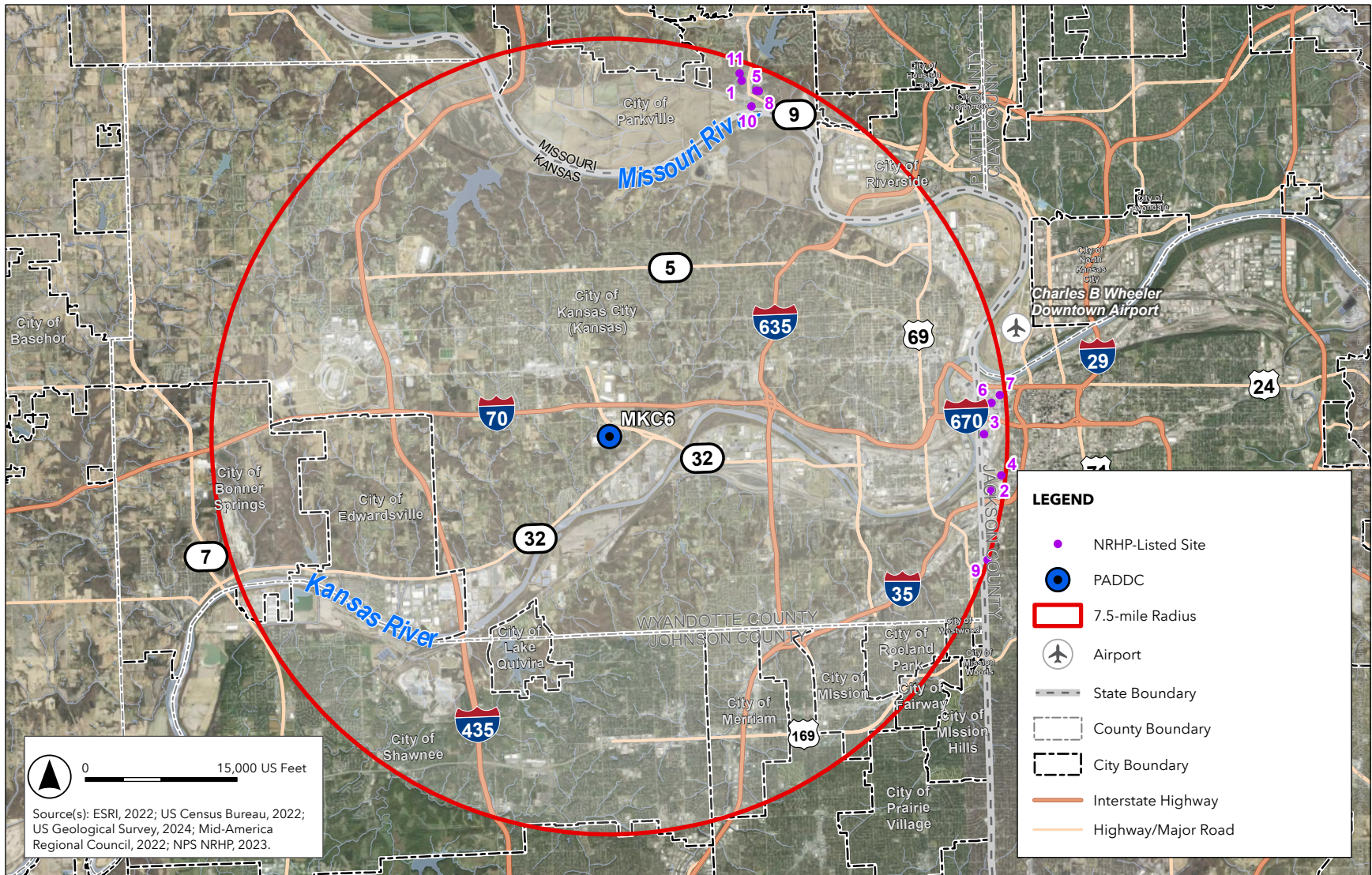
**Amazon Prime Air MK30 Drone**

**Attachment B**  
**MK30 Drone Flight Profile**

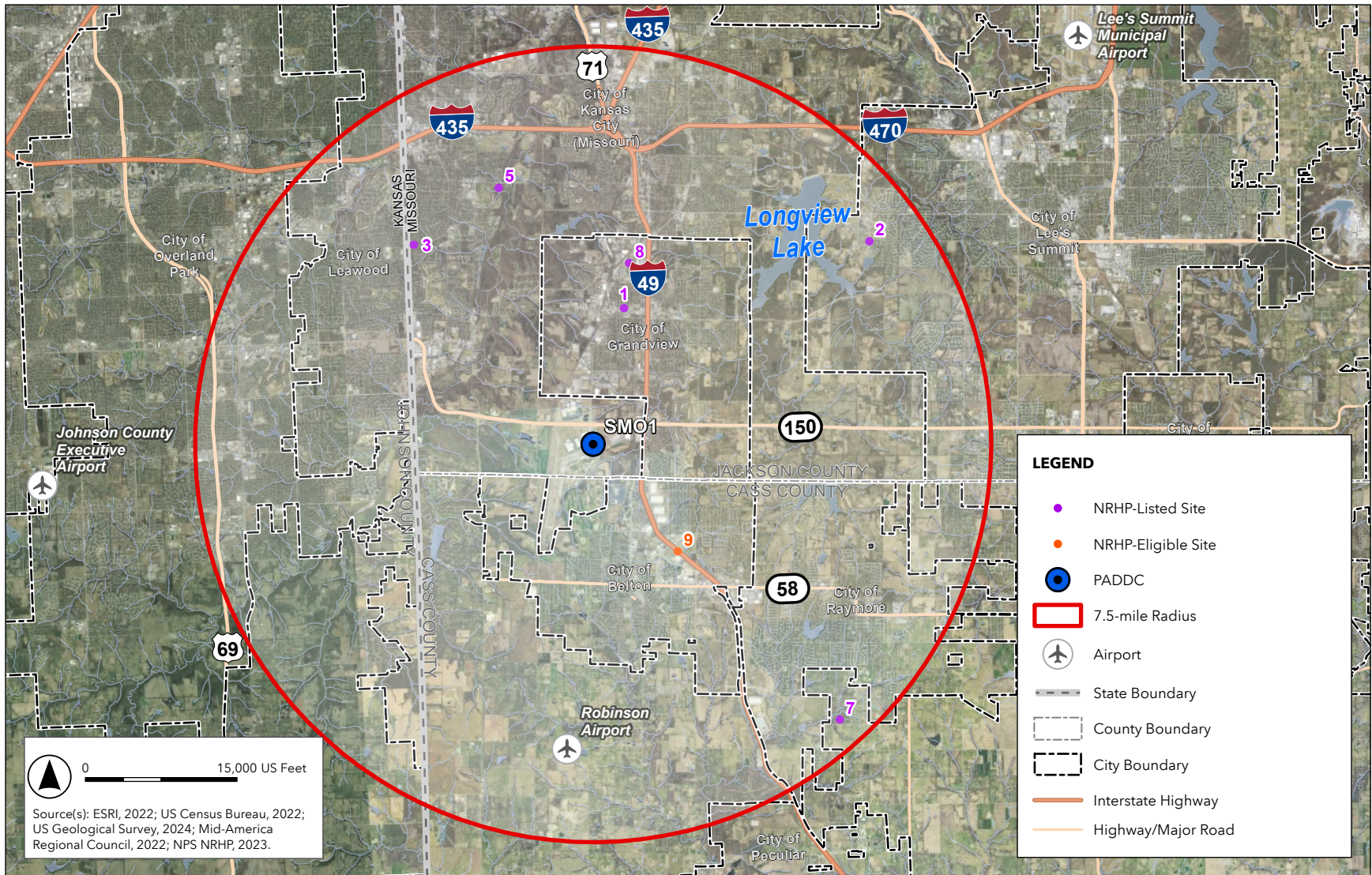


**MK30 Drone Flight Profile**

**Attachment C**  
**Proposed Areas of Potential Effects**



**Figure B-1**  
 Attachment B  
 Area of Potential Effects MKC6 PADD  
 Historical Resources



**Figure B-2**  
 Attachment B  
 Area of Potential Effects SMO1 PADD  
 Historical Resources

**Attachment D**  
**Listed and Eligible NHRP Resources**

**Table D-1**  
**Historic Resources in the APE – MKC6**

<b>ID No.</b>	<b>Resource Name</b>	<b>Address</b>	<b>Significance</b>
1	Banneker, Benjamin, School	31 W. Eighth St.	NRHP Listed
2	Imperial Brewing Company Brewery	2825 Southwest Blvd.	NRHP Listed
3	Kansas City Live Stock Exchange	1600 Genessee St.	NRHP Listed
4	Kansas City Terminal Railway Company Roundhouse Historic District	Jct. of 27th St. and Southwest Blvd.	NRHP Listed
5	Mackay Building	Park College	NRHP Listed
6	Marty, Albert, Building	1412-1418 W. 12th St.	NRHP Listed
7	Ridenour-Baker Grocery Company Building	933 Mulberry St.	NRHP Listed
8	Scott, Charles Smith, Memorial Observatory	8700 River Park Dr.	NRHP Listed
9	Volker, William, House	3717 Bell St.	NRHP Listed
10	Waddell "A" Truss Bridge	English Landing Park, over Rush Cr.	NRHP Listed
11	Washington Chapel C.M.E. Church	1137 West St.	NRHP Listed

**Table D-2**  
**Historic Resources in the APE – SMO1**

<b>ID No.</b>	<b>Resource Name</b>	<b>Address</b>	<b>Significance</b>
1	Grandview Residential Historic District	807-1111 Highgrove Rd., 13016-13020 and 13019 Grandview Rd. and 13006-13018 10th St.	NRHP Listed
2	Longview Farm	Lees Summit, off Raytown Rd.	NRHP Listed
3	New Santa Fe "Three Trails" Trail Swales	W. Santa Fe Trail, 1/2 blk. W. of jct. with Madison Ave.	NRHP Listed
4	Santa Fe Trail-Minor Park, Kansas City, Trail Segments	Red Bridge Rd. E of jct. with Holmes Rd.	NRHP Listed
5	Watkins Family Farm Historic District	19116 S. School Rd.	NRHP Listed
6	Young, Solomon, Farm-Truman, Harry S., Farm	12121 and 12301 Blue Ridge Extension	NRHP Listed
7	Building 602, Richards-Gebaur AFB	Off US 71 S of Kansas City	NRHP Eligible

**Attachment E**  
**Consulted Parties**

**Pursuant to Section 106 of the NHPA, additional parties consulted include the following:**

- Iowa Tribe of Kansas and Nebraska
- Iowa Tribe of Oklahoma
- Kaw Nation of Oklahoma
- Miami Tribe of Oklahoma
- Omaha Tribe of Nebraska
- The Osage Nation
- Otoe-Missouria Tribe of Indians, Oklahoma
- Pawnee Nation of Oklahoma
- Ponca Tribe of Indians of Oklahoma
- Ponca Tribe of Nebraska
- Sac and Fox Nation of the Missouri in Kansas and Nebraska
- Sac and Fox Nation, Oklahoma
- Sac and Fox Tribe of the Mississippi in Iowa
- Shawnee Tribe
- Wyandotte Nation



**FOR SHPO USE ONLY**

SHPO PROJECT NUMBER SHPO LOG NUMBER

Have you ever served on active duty in the Armed Forces of the United States and separated from such service under conditions other than dishonorable?  YES  NO

Submit one application for each project for which comment is requested. Consult the [Instructions for Completion of the Review and Compliance Information Form](#) when completing this application. Submission of a completed Review and Compliance Information Form with adequate information and attachments constitutes a request for review pursuant to Section 106 or 110 of the National Historic Preservation Act of 1966 (as amended). We reserve the right to request more information. **Please refer to the CHECKLIST on Page 3 to ensure that all basic information relevant to the project has been included.** For further information, refer to our website at <http://mostateparks.com/shpo> and follow the links to Section 106 Review.

NOTE: Section 106 regulations provide for a 30-day response time by the Missouri State Historic Preservation Office from the date of receipt.

**I. REVIEW TYPE**

Section 106  Section 110  Courtesy Review

**II. SUBMISSION TYPE**

New Submission  Existing Project (Provide Existing Project Number)

Does this submission include a cultural resource investigation report? (If yes, you must include a [Cultural Resource Investigation Report Form](#))  YES  NO

Does this submission include architectural plans and/or construction documents (If yes, include them in your submission)?  YES  NO

Is this submission related to a programmatic agreement (PA) or memorandum of agreement (MOA)?  YES  NO  
If yes, provide PA or MOA Draft number \_\_\_\_\_ or MOA or PA Mitigation Stipulation number \_\_\_\_\_

**III. PROJECT INFORMATION**

PROJECT NAME (include any agency assigned project numbers and please do not include applicants' names)

Amazon Prime Air Drone Delivery Operations in the Kansas City Metro Area

PROJECT DESCRIPTION (additional information may be provided in separate sheets)

Amazon Prime Air projects flying up to approximately 1,000 MK30 drone flights per operating day from each of two proposed Prime Air Drone Delivery Centers (PADDC) located in the Kansas City metro area, with each flight transporting a package to a customer delivery address before returning to the PADDCs. Drone flights could be conducted up to 365 days a year between 7 A.M. and 10 P.M. Drone operations would be conducted from existing facilities, and no ground disturbance would be required for any aspect of the Proposed Action.

**IV. PROJECT LOCATION**

STREET ADDRESS

The proposed Action involves two APEs, each with a footprint of 175 square miles - see attached for detailed information

CITY		STATE		ZIP	
COUNTY		LATITUDE/LONGITUDE		SECTION	
		TOWNSHIP		RANGE	

**V. PROJECT CONTACT INFORMATION**

PROJECT CONTACT NAME Jim Fitzpatrick		PROJECT CONTACT ORGANIZATION Amazon Prime Air	
PROJECT CONTACT EMAIL fitzpkja@amazon.com		PHONE (EXT.) 253-651-3978	
STREET ADDRESS 410 Terry Avenue N			
CITY Seattle		STATE WA	
		ZIP 98109	

**VI. FEDERAL INVOLVEMENT**

Does this project involve approval, funding, permit, or license from a federal agency or involve federal land or property?  YES (Please complete this section)  NO (Skip to next section)

FEDERAL AGENCY Federal Aviation Administration (FAA)		FEDERAL PROGRAM, FUNDING, OR PERMIT TYPE	
FEDERAL AGENCY CONTACT PERSON Christopher Hurst		PHONE	
EMAIL Christopher.A.Hurst@faa.gov			



**STATE HISTORIC PRESERVATION OFFICE  
REVIEW AND COMPLIANCE INFORMATION FORM (PAGE 2 OF 3)**

**VII. CONTACTS FOR CC (please indicate all individuals to Cc for SHPO response letter)**

CONTACT NAME <b>Neal Wolfe</b>	ORGANIZATION <b>Environmental Science Associates</b>	EMAIL <b>nwolfe@esassoc.com</b>
CONTACT NAME	ORGANIZATION	EMAIL
CONTACT NAME	ORGANIZATION	EMAIL

**VIII. IDENTIFICATION OF HISTORIC PROPERTIES: ARCHAEOLOGY**

Does this project involve ground-disturbing activity (including staging and borrow areas)?  YES (Please complete this section)  NO  WILL SUBMIT LATER

DESCRIBE THE NATURE OF GROUND-DISTURBING ACTIVITY, INCLUDING BUT NOT LIMITED TO DEPTH, WIDTH, AND LENGTH

DESCRIBE THE PREVIOUS AND CURRENT LAND USE, CONDITIONS, AND DISTURBANCES

Will the project require fill material?  YES (If yes, indicate borrow areas on project area map)  NO

Are you aware of archaeological sites on or adjacent to the project area?  YES (If yes, indicate all archaeological sites on project area map)  NO

**IX. IDENTIFICATION OF HISTORIC PROPERTIES: BUILDINGS AND STRUCTURES**

Does the project area or APE include buildings, structures, objects, or designed landscape features (such as parks or cemeteries)?  YES (Please complete this section and provide a map showing resource locations)  NO (Skip to next section)

ADDRESS AND RESOURCE NAME OR NUMBER	DATE OF CONSTRUCTION	DATES OF ADDITIONS
<b>Multiple properties located in the APEs - see attached for detailed information</b>		

If there are more resources include a separate page identifying this information.

Is the project area or APE within or adjacent to a property or district that is listed in or eligible for listing in the National Register of Historic Places?  YES  NO  UNKNOWN

**X. DETERMINATION OF EFFECT**

- No Historic Properties Affected
- Historic Properties Will Be Affected and the Project Will (Check One):
- Have **NO ADVERSE EFFECT** on Historic Properties within the area of potential effects (APE).
  - Have an **ADVERSE EFFECT** on One or More Historic Properties in the APE and the Federal Agency, or Federally Authorized Representative, will Consult with the SHPO and Other Parties to Resolve the Adverse Effect Under CFR 800.6.

BASIS FOR DETERMINATION OF EFFECT

No ground disturbance would occur and the effect of drone operations on historic properties would be limited to non-physical, reversible impacts, such as the introduction of transient audible and/or visual elements. The number of daily drone operations would be limited such that any historic or cultural resource would only be subject to a small number of overflights per day. A technical analysis concluded that noise levels would be below the FAA's threshold for significance.



**XI. ADDITIONAL REQUIREMENTS**

**Map Requirements:** Attach a map depicting the project area, and, if necessary, a large scale project map. If project involves ground disturbance, the project footprint must be clearly delineated on the map. Please do not send an individual map with each structure or site. While a topographic map is preferred, other styles of maps are acceptable.

**Photography requirements:** Recent photographs of the complete exterior elevations of the building(s). **Good quality photographs are important for expeditious project review.** Our office does not accept images from online image servers (e.g., Google Earth or Maps) due to the time elapsed between the image capture and the project date. Photographs of neighboring or nearby buildings should also be submitted. All photographs should be labeled and keyed to a map of the project area. Images should be at a minimum of 300 pixels per inch or 1200 x 1800 pixels. Please provide clear recent photographs to aid in the assessment of effects for this project.

**CHECKLIST: DID YOU PROVIDE THE FOLLOWING INFORMATION?**

- Project area map (per project, not structure)
- Thorough project description detailing all aspects of project
- Photographs of all structures and overview photographs for archaeology (Note: all photographs should be labeled and keyed to one map of the project area)
- Other supporting documents (if necessary to explain the document)
- For new construction, rehabilitations, etc., attach work write-ups, plans, drawings, etc.
- Dates of construction of structures in project area

Return this form and attachments to: [MOSection106@dnr.mo.gov](mailto:MOSection106@dnr.mo.gov) with the following subject heading format: "Review Request – (SHPO Project Number (if previously assigned), Project Title and/or Address)." Please note that our system cannot receive emails exceeding 10 MB in size. If your submission contains large files, you may provide this information to our office via a large-file transfer service such as your organization's FTP system, Dropbox, Google Drive, etc. If your organization does not have access to a large-file transfer service you may request that SHPO sends you an FTP upload request from the State of Missouri system by checking the box below:

- APPLICANT IS REQUESTING AN FTP UPLOAD LINK BE SENT TO THE FOLLOWING EMAIL ADDRESS

**FOR SHPO USE ONLY**

REVIEWER 1 NAME	DATE
REVIEWER 2 NAME	DATE

SURVEY ACREAGE

NUMBER OF ELIGIBLE PROPERTIES

NUMBER OF NOT ELIGIBLE PROPERTIES

ARCHAEOLOGY REVIEW DETERMINATION

NHPA       More Info       Survey       PA       Other:  
 NAE       NRN       Monitor       ATF  
 AE       Email       MOA       Continue to Consult

ARCHITECTURE REVIEW DETERMINATION:

NHPA       More Info       Survey       PA       Other:  
 NAE       NRN       Monitor       ATF  
 AE       Email       MOA       Continue to Consult

STAFF COMMENTS



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

Mike Kehoe  
Governor

Kurt U. Schaefer  
Director

July 23, 2025

Jim Fitzpatrick  
Amazon Prime Air  
410 Terry Avenue North  
Seattle, WA 98109

**Re: SHPO Project Number: 060-MLT-25** — Amazon Prime Air Drone Delivery Operations in the Kansas City Metro Area – Platte, Jackson, and Cass Counties, Missouri (FAA)

Dear Jim Fitzpatrick:

Thank you for submitting information to the State Historic Preservation Office (SHPO) regarding the above-referenced project for review pursuant to Section 106 of the National Historic Preservation Act, P.L. 89-665, as amended (NHPA), and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of historic properties.

We have reviewed the information regarding the above-referenced project and have included our comments on the following page(s). Please retain this documentation as evidence of consultation with the Missouri SHPO under Section 106 of the NHPA. SHPO concurrence does not complete the Section 106 process as federal agencies will need to conduct consultation with all interested parties. **Please be advised that, if the current project area or scope of work changes, such as a borrow area being added, or cultural materials are encountered during construction, appropriate information must be provided to this office for further review and comment.**

If you have questions, please contact the SHPO at (573)751-7858 or call/email Aaron Schmidt (573) 522-4641, [aaron.schmidt2@dnr.mo.gov](mailto:aaron.schmidt2@dnr.mo.gov). If additional information is required, please submit the information via email to [MOSection106@dnr.mo.gov](mailto:MOSection106@dnr.mo.gov).

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Dawn Scott, Director  
Deputy State Historic Preservation Officer

c: Christopher Hurst, FAA  
Neal Wolfe, Environmental Science Association



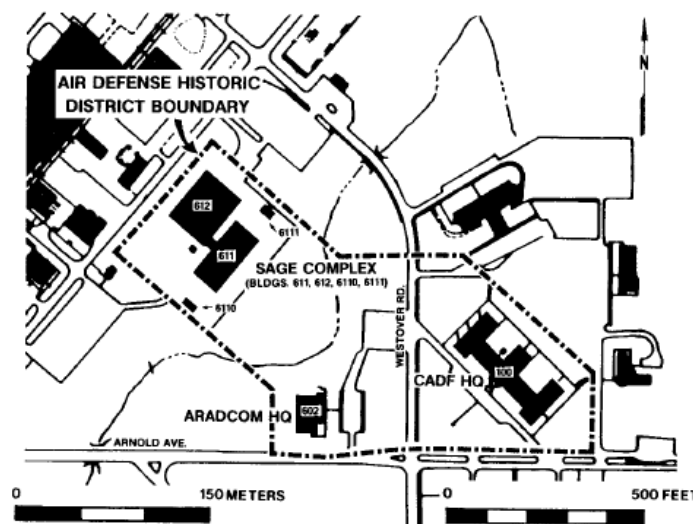
**SHPO Project Number: 060-MLT-25** — Amazon Prime Air Drone Delivery Operations in the Kansas City Metro Area – Platte, Jackson, and Cass Counties, Missouri (FAA)

COMMENTS:

We have reviewed the documentation associated with the proposed Cultural Resources Assessment of the Amazon Prime air drone delivery undertaking in the Kansas City Metro Area, which includes two Area of Potential Effects (APEs) that each have a 7.5-mile radius. One APE radius is centered on a Prime Air Drone Delivery Center (PADDC) located near 6925 Riverview Ave, Kansas City, Kansas (MKC6) and the other APE radius is centered on a PADDC located near 4001 E 149th St, Kansas City, Missouri (SMO1).

We concur that the extreme northern and western limits of the APE for MKC6 include 11 individual resources or historic districts listed on the National Register of Historic Places (NRHP) and also concur that the proposed undertaking will have **no adverse effect**.

We concur that the APE for SMO6 includes six resources listed on the NRHP. Table D-2 of the FAA memo also indicates that the APE also includes an NRHP-eligible resource, Building 602 from the former Richards-Gebaur Air Force Base (AFB). For situational awareness, SHPO records indicate that a cultural resources survey was performed at the Richards-Gebaur AFB in 1983, which recommended a potential Air Defense Historic District at the intersection of Kensington Avenue and East 155th Street. The authors indicated that this potential historic district would include Building 602, as well as Building 611 (extant), Building 612 (extant), and Building 100 (non-extant). Although Building 100 was demolished sometime between 1990 and 1997, it appears the remaining buildings retain integrity and therefore, there may still be potential for an Air Defense Historic District in this area. However, SHPO concurs that the scope of work as described in the FAA memo will have **no adverse effect** on the listed or eligible resources within the SMO6 APE.



Potential Air Defense Historic District Boundary as identified in Donald E. Weston and Christopher A. Wright, *Cultural Resources Inventory and Evaluation of the Richards-Gebaur Air Force Base, Cass and Jackson Counties, Missouri* (Environmental Systems Analysis, Inc., 1983)

**From:** [Hurst, Christopher A \(FAA\)](#)  
**To:** [Neal Wolfe](#)  
**Cc:** [Fitzpatrick, Jim](#)  
**Subject:** FW: [KSR&C] Project submission successful for 25-06-149 - Amazon Prime Air Drone Delivery Operations in the Kansas City Metro Area  
**Date:** Wednesday, June 25, 2025 4:31:03 PM

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## **Project Info**

- **Project Name**
  - [Amazon Prime Air Drone Delivery Operations in the Kansas City Metro Area](#)
- **Description**
  - *Amazon Prime Air is proposing to fly up to 1,000 MK30 drone package delivery flights per operating day from each of two Prime Air Drone Delivery Centers (PADDC) located in the Kansas City metro area. One of the PADDCs is located in Kansas (MKC6) and the other is located in Missouri (SMO1). Drones from both PADDCs would conduct operations in Kansas. Drone flights would be conducted between 7 A.M. and 10 P.M each day. No ground disturbance would be required for any aspect of the Proposed Action.*
- **Project Type**
  - Other
- **Project #**
  - 25-06-149

Chris Hurst  
REM/CEA/CESCO  
Environmental Protection Specialist

AFS-752  
General Aviation and Commercial Branch  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service  
[christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)  
CST

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**From:** [noreply@workflownotification.com](mailto:noreply@workflownotification.com) <[noreply@workflownotification.com](mailto:noreply@workflownotification.com)>  
**Sent:** Wednesday, June 25, 2025 3:25 PM  
**To:** Hurst, Christopher A (FAA) <[Christopher.A.Hurst@faa.gov](mailto:Christopher.A.Hurst@faa.gov)>  
**Subject:** [KSR&C] Project submission successful for 25-06-149 - Amazon Prime Air Drone Delivery Operations in the Kansas City Metro Area

You don't often get email from [noreply@workflownotification.com](mailto:noreply@workflownotification.com). [Learn why this is important](#)

**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Thank you for submitting a request for project review. Your submission will be reviewed in the order it was received. Please note that state and federal laws provide SHPO staff 30 days for review and comment.

You may track the progress of your request by logging in at <https://review.kansashistory.gov>

Use of this automated system is intended to facilitate review and consultation under state and federal preservation laws and may contain information that is confidential, privileged or otherwise protected from disclosure under applicable laws.

## PROJECT DOCUMENTS

---

**Date**

2025-07-02T20:59:53Z

**Subject**

25-06-149 - Amazon Prime Air Drone Delivery Operations in the Kansas City Metro Area

**Body**

25-06-149 - Amazon Prime Air Drone Delivery Operations in the Kansas City Metro Area

Christopher Hurst

We have reviewed the information received June 25, 2025 regarding the above-referenced project in accordance with 36 CFR Part 800. In reviews of this nature, the State Historic Preservation Office (SHPO) determines whether a federally funded, licensed, or permitted project will adversely affect properties that are listed or determined eligible for listing in the National Register of Historic Places. The SHPO has determined that the proposed project will not adversely affect any National Register-listed or National Register-eligible properties. This concludes the SHPO's role in this review.

Thank you for giving us the opportunity to comment on this proposal. Please refer to the Kansas State Review & Compliance number (KSR&C#) listed above on any future correspondence. Please submit any comments or questions regarding this review to me at 785-272-8681, ext. 227 or [robert.elder@ks.gov](mailto:robert.elder@ks.gov)

On behalf of:

Katrina Ringler

Deputy State Historic Preservation Officer

Kansas Historical Society

Finished

Appendix D-2  
**Tribal Consultation**



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave., SW.  
Washington, DC 20591

Chairman Jacob Keyes  
Iowa Tribe of Oklahoma  
335588 East 750 Road  
Perkins, OK 74059

*Transmitted via mail and email: [jkeyes@iowanation.org](mailto:jkeyes@iowanation.org)*

**RE: Invitation for Government-to-Government Tribal Consultation for Drone Package Delivery Operations in Kansas and Missouri**

Dear Chairman Keyes,

The purpose of this letter is to initiate formal government-to-government consultation regarding a proposal under consideration by the Federal Aviation Administration (FAA) to authorize commercial Unmanned Aircraft Systems (UAS) operators to deliver goods to customers (referred to as package delivery) using unmanned aircraft (also referred to as drones) in accordance with 14 Code of Federal Regulations Part 135 (Part 135) in the states of Kansas and Missouri. The FAA is the lead federal agency for government-to-government consultation for the proposed project. Amazon.com Services LLC, doing business as Amazon Prime Air, is the proponent of the project. We wish to solicit your views regarding potential effects on tribal interests in the areas of operation.

The primary purpose of government-to-government consultation is to ensure that Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect the Tribes. This policy is provided in Federal Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*; Presidential Memorandum, *Uniform Standards for Tribal Consultation*; DOT Order 5301.1A, *Department of Transportation Tribal Consultation Policy and Procedures*; and FAA Order 1210.20, *American Indian and Alaska Native Tribal Consultation Policy and Procedures*.

**Consultation Initiation**

With this letter, the FAA is seeking input concerning any Tribal lands or sites of religious or cultural significance that may be affected by the proposed operation. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources. We are available to discuss the details of the proposed project with you.

**Proposed Activity Description**

The FAA is preparing an Environmental Assessment to assess the potential environmental impacts of commercial package delivery operations using drones in the states of Kansas and Missouri under Part

135. Since 2019, the FAA has been issuing air carrier certificates to UAS operators in accordance with Part 135 so that operators can conduct package delivery flights. Generally, these approvals are associated with issuing a new or amended Part 135 air carrier Operations Specifications as the operative approval. For your reference, the project description used for consultation under Section 106 is enclosed with this letter.

### **Confidentiality**

We understand that you may have concerns about the confidentiality of information on areas or resources of traditional, religious, and cultural importance to your Tribe. We are available to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

### **FAA Contact Information**

We anticipate that this letter will arrive by regular mail no later than July 28, 2025. Your timely response within 30 days of receipt of this letter will greatly assist us in incorporating your concerns into our environmental review of the operation. In addition, we respectfully request your response in the event that the Iowa Tribe of Oklahoma would like to consult with the FAA in a government-to-government relationship about this proposal. Please contact Christopher Hurst via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov) within 30 days of receipt of this letter to confirm your intent to participate in this government-to-government consultation.

Sincerely,

Enclosure:

Attachment A – Section 106 Consultation Package

CC: Ms. Candace Preshall  
Tribal Historic Preservation Officer

**RE: Invitation for Government-to-Government Tribal Consultation for Drone Package Delivery Operations in Kansas and Missouri**

**DEREK W  
HUFTY**

Digitally signed by DEREK  
W HUFTY  
Date: 2025.07.10 08:20:39  
-04'00'

Derek Hufty  
Manager, General Aviation and Commercial Branch (AFS-750)  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service

**Attachment A**  
**Section 106 Consultation Package**



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave., SW.  
Washington, DC 20591

Ms. Candace Preshall  
Tribal Historic Preservation Officer  
Iowa Tribe of Oklahoma  
335588 East 750 Road  
Perkins, OK 74059

*Transmitted via e-mail and mail: [cpershall@iowanation.org](mailto:cpershall@iowanation.org)*

Dear Ms. Preshall,

The Federal Aviation Administration (FAA) is currently evaluating Amazon Prime Air's proposal to conduct commercial drone delivery operations in the states of Kansas and Missouri. Amazon Prime Air must obtain approval from the FAA prior to introducing operations and operating the MK30 drone. The FAA has determined that its proposed action, which would encompass all FAA approvals necessary to enable operations, is an undertaking as defined under the regulations implementing Section 106 of the National Historic Preservation Act (NHPA) (36 CFR § 800.16(y)). The purpose of this letter is to initiate Section 106 consultation with the Iowa Tribe of Oklahoma and to solicit your views regarding potential effects on tribal interests in the areas of operation. The FAA has begun an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) to analyze the proposed action. FAA intends to complete consultation for Section 106 of the NHPA concurrently with the NEPA process.

### **Project Description**

Amazon Prime Air is proposing to transport consumer goods via drone delivery in the communities around the states of Kansas and Missouri by using the MK30 drone. The MK30 drone would take off from a Prime Air Drone Delivery Center (PADDC), which has already been constructed, and quickly rise to a cruising altitude of between 180 to 377 feet above ground level (AGL). The MK30 drone weighs approximately 87 pounds and can transport a small package up to about 5 pounds. The MK30 drone has an approximate 7.5-mile service radius. Once at the delivery site, the MK30 drone hovers in place at about 13 feet AGL and drops the package to the ground. Once the package has been delivered, the drone flies back to the PADDC at roughly the same altitude.

Amazon Prime Air is proposing up to 1,000 MK30 drone flights per day from two proposed PADDCs located in the Kansas City metropolitan area, with each flight taking a package to a customer delivery address before returning. One PADDC would be located in Kansas (MKC6) and the other PADDC would be located in Missouri (SMO1), but drone delivery operations associated with both PADDCs could cross both state lines.

There is variability in the number of flights per day based on customer demand and weather conditions. Initially, Amazon Prime Air expects to fly much less than 1,000 flights per day from each PADDC and gradually ramp up to the proposed level as consumer demand increases. Drone flights are planned to occur up to 365 days a year, with operations being conducted between 7 A.M. and 10 P.M.

There are no ground disturbing activities associated with this proposed action.

### **Area of Potential Effects**

In accordance with 36 CFR § 800.4(a)(1), the FAA has defined the Area of Potential Effects (APE) in consideration of the undertaking's potential direct and indirect effects. The proposed APEs have been coordinated with the Kansas and Missouri State Historic Preservation Offices and would be located in the Kansas City metropolitan area, which generally include densely populated or congested regions. The enclosed map (see **Attachment A**) shows the proposed APEs in detail.

### **Identification of Historic Properties**

The proposed undertaking does not have the potential to affect below ground or archeological resources because the undertaking does not include ground disturbance but could result in auditory or visual effects. Therefore, the FAA focused its identification efforts on above-ground historic properties.

### **Consultation**

The FAA is now soliciting the opinion of the tribes concerning any tribal lands, or sites of religious or cultural significance that may be affected by the proposed operations areas. We anticipate that this letter will arrive by regular mail no later than July 28, 2025. Your timely response within 30 days of receipt of this letter will greatly assist us in incorporating your concerns into our environmental review of the operation. If you have any questions or need additional information, please contact Christopher Hurst via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov) within 30 days of receipt of this letter.

Sincerely,

Enclosure:  
Attachment A – Proposed Areas of Potential Effects

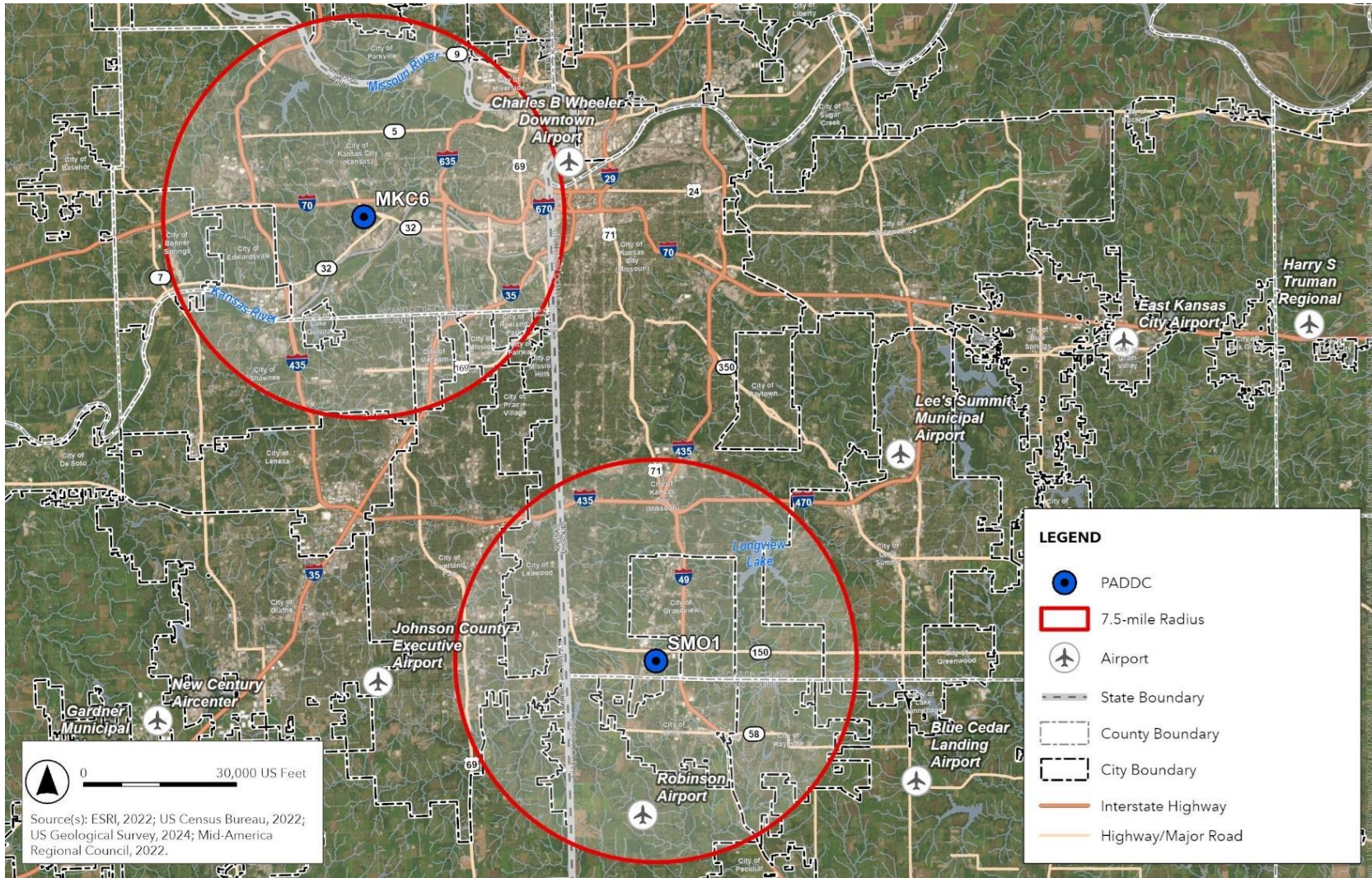
**RE: Invitation for Section 106 of the National Historic Preservation Act Tribal Consultation for Drone Package Delivery Operations in Kansas and Missouri**

**DEREK W  
HUFTY**

Digitally signed by  
DEREK W HUFTY  
Date: 2025.07.10  
08:21:01 -04'00'

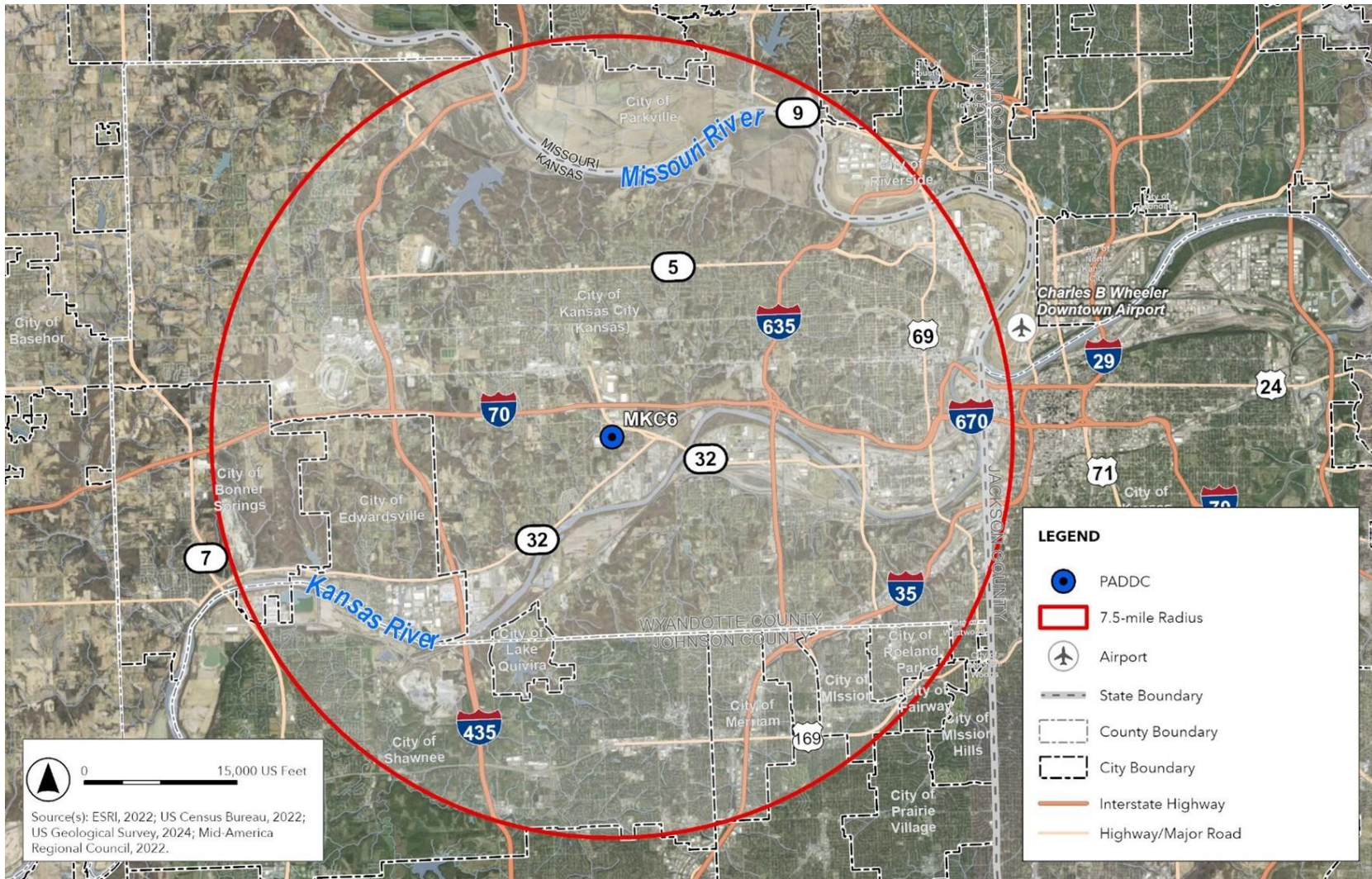
Derek Hufty  
Manager, General Aviation and Commercial Branch (AFS-750)  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service

**Attachment A**  
**Proposed Areas of Potential Effects**



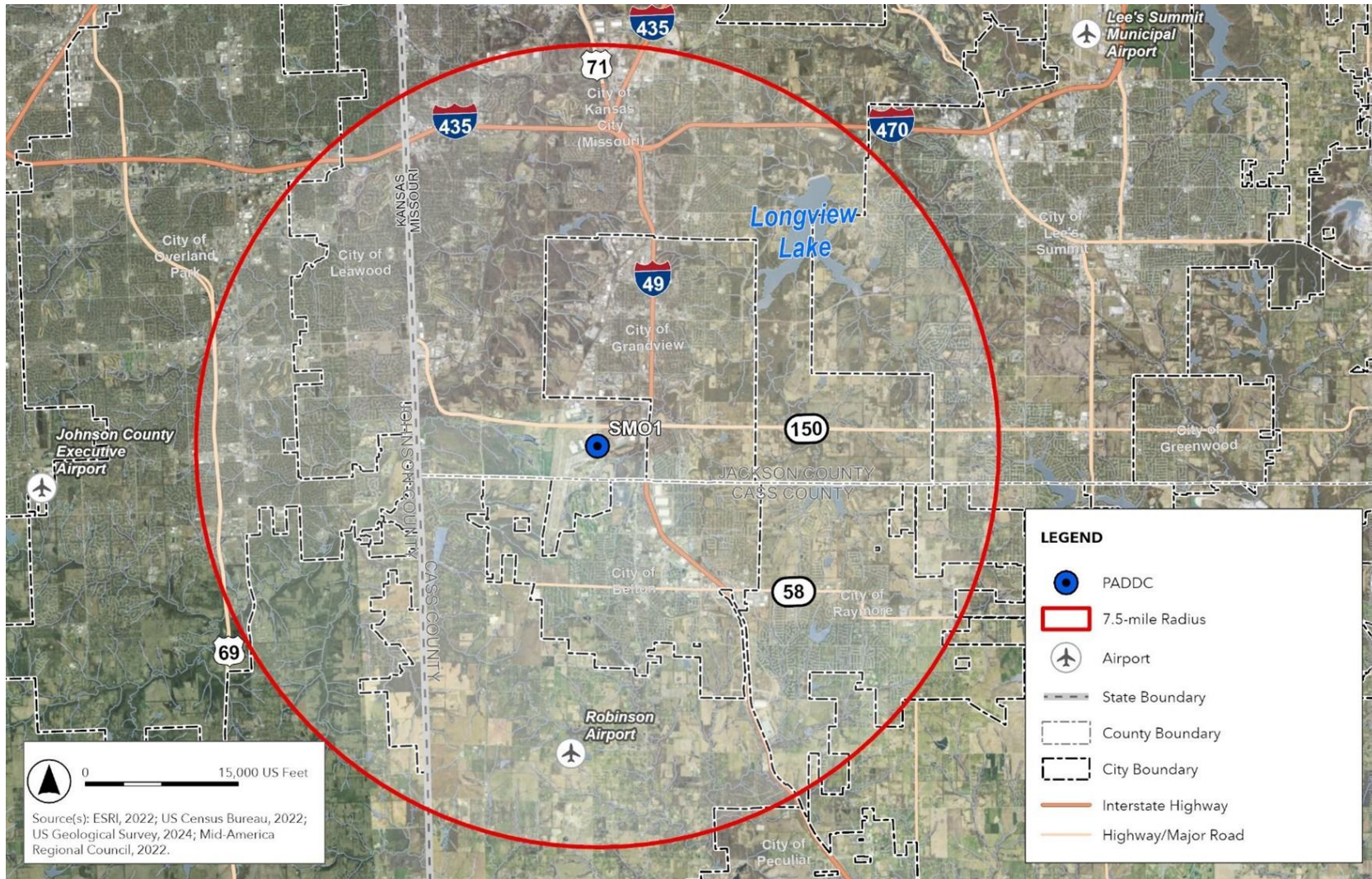
SOURCE: ESA, 2024; Maxar, 2022; US Census Bureau, 2021; US Geological Survey, 2022.

**Figure 1**  
Areas of Potential Effects – All PADDs



SOURCE: ESA, 2024; Maxar, 2022; US Census Bureau, 2021; US Geological Survey, 2022.

**Figure 2**  
MKC6 Drone Operation Area of Potential Effects



SOURCE: ESA, 2024; Maxar, 2022; US Census Bureau, 2021; US Geological Survey, 2022.

**Figure 3**  
SMO1 Drone Operation Area of Potential Effects



FAA, Derek Hufty Manager,  
General Aviation and Commercial Branch (AFS-750)  
Emerging Technologies Division  
Office of Safety Standards,  
Flight Standards Service

7/16/2025

Amazon Prime Air is proposing to transport consumer goods via drone delivery in the communities around the states of Kansas and Missouri by using the MK30 drone.

Figure 1 Area of Potential Effects – All PADDs

Figure 2 MKC6 Drone Operation Area of Potential Effects

Figure 3 SMO1 Drone Operation Area of Potential Effects

I Have No Concerns

Alan Kelley THPO  
Iowa Tribe of Kansas and Nebraska  
3345 Thrasher Road, White Cloud Kansas  
785-883-0080, [akelley@iowas.org](mailto:akelley@iowas.org)



## Osage Nation Historic Preservation Office

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**Date:** September 8, 2025

**File:** 2425-7576MO-7

Federal Aviation Administration  
Chris Hurst  
9-FAA-Drone-Environmental@faa.gov

**RE: FAA, Amazon Drone Package Delivery in Kansas and Missouri**

***SENT VIA EMAIL***

Dear Mr. Hurst,

The Osage Nation Historic Preservation Office has evaluated your submission regarding the proposed FAA, Amazon Drone Package Delivery in Kansas and Missouri and determined that the proposed project **most likely will not adversely affect any sacred properties and/or properties of cultural significance to the Osage Nation**. For direct effect, the finding of this NHPA Section 106 review is a determination of “**No Properties**” eligible or potentially eligible for the National Register of Historic Places.

In accordance with the National Historic Preservation Act, (NHPA) [54 U.S.C. § 300101 et seq.] 1966, undertakings subject to the review process are referred to in 54 U.S.C. § 302706 (a), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969). **The Osage Nation concurs that the Federal Aviation Administration fulfilled NHPA compliance by consulting with the Osage Nation Historic Preservation Office in regard to the proposed project referenced as FAA, Amazon Drone Package Delivery in Kansas and Missouri.**

The Osage Nation has vital interests in protecting its historic and ancestral cultural resources. We do not anticipate that this project will adversely impact any cultural resources or human remains protected under the NHPA, NEPA, the Native American Graves Protection and Repatriation Act, or Osage law. **If, however, artifacts or human remains are discovered during project construction, we ask that work cease immediately and the Osage Nation Historic Preservation Office be contacted.**

Should you have any questions or need any additional information please feel free to contact Luke Morris at luke.morris@osagenation-nsn.gov. Thank you for consulting with the Osage Nation on this matter.

Andrea A. Hunter, Ph.D.  
Director, Tribal Historic Preservation Officer

Luke Morris  
Archaeologist

**From:** [9-FAA-Drone-Environmental \(FAA\)](#)  
**To:** [Neal Wolfe](#)  
**Cc:** [Fitzpatrick, Jim](#)  
**Subject:** FW: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Kansas.  
**Date:** Thursday, July 17, 2025 12:16:54 PM

---

**From:** Rhonda Barnes <[rbarnes@estoo.net](mailto:rbarnes@estoo.net)>  
**Sent:** Tuesday, July 15, 2025 1:32 PM  
**To:** 9-FAA-Drone-Environmental (FAA) <[9-FAA-Drone-Environmental@faa.gov](mailto:9-FAA-Drone-Environmental@faa.gov)>  
**Subject:** Re: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Kansas.

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Amazon Prime Air, Drone Package Delivery Operations:

Thank you for contacting Eastern Shawnee Tribe, we have No concerns with this Project.

*To Expedite Our Review Process*

*\*We Prefer\* Electronic Copy*

*Please Submit Electronic Copy of 106 Project Files to:*

[THPO@estoo.net](mailto:THPO@estoo.net)



*Rhonda Barnes*

*Cultural Preservation Department 106/NAGPRA*

*Eastern Shawnee Tribe Of Oklahoma*

*70400 East Hwy 60      **\*\*NEW ADDRESS\*\****

*Wyandotte, Ok. 74370*

918-238-5151 Ext 1862

[rbarnes@estoo.net](mailto:rbarnes@estoo.net)

---

**From:** 9-FAA-Drone-Environmental (FAA) <[9-FAA-Drone-Environmental@faa.gov](mailto:9-FAA-Drone-Environmental@faa.gov)>  
**Sent:** Monday, July 14, 2025 1:43 PM  
**To:** Glenna J. Wallace <[GJWallace@estoo.net](mailto:GJWallace@estoo.net)>; THPO <[thpo@estoo.net](mailto:thpo@estoo.net)>; Lora Nuckolls <[LNuckolls@estoo.net](mailto:LNuckolls@estoo.net)>  
**Cc:** Hurst, Christopher A (FAA) <[Christopher.A.Hurst@faa.gov](mailto:Christopher.A.Hurst@faa.gov)>; DeLaune, Jonathan (FAA) <[jonathan.delaine@faa.gov](mailto:jonathan.delaine@faa.gov)>; Jones, Jodi A-CTR (FAA) <[jodi.a-ctr.jones@faa.gov](mailto:jodi.a-ctr.jones@faa.gov)>  
**Subject:** FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Kansas.

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**\*\*\* [EXTERNAL EMAIL] Attachments and links may be malicious! \*\*\***

Good afternoon,

My name is Chris Hurst and I am an environmental specialist with the Federal Aviation Administration (FAA). The purpose of this email is to initiate formal government-to-government and National Historic Preservation Act (NHPA) Section 106 consultations regarding a proposal by Amazon Prime Air. The FAA is considering whether to authorize expanded commercial Unmanned Aircraft Systems (UAS) operations to deliver goods to customers (*referred to as package delivery*) using unmanned aircraft (*also referred to as drones*) in accordance with 14 Code of Federal Regulations Part 135 (Part 135) in the state of *Kansas*. The FAA is the lead federal agency for the proposed project. Amazon Prime Air is the project proponent. We wish to solicit your views regarding potential effects on tribal interests in the area.

The primary purpose of government-to-government and NHPA Section 106 consultation is to ensure that Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect the Tribes.

## **Consultation Initiation**

With this consultation package (*attached and also transmitted via regular mail*), the FAA is seeking input concerning any Tribal lands or sites of religious or cultural significance that may be affected by the proposed operation. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources. We are available to discuss the details of the proposed project with you.

## **Proposed Activity**

Amazon Prime Air is working with the FAA to prepare an environmental assessment to assess the potential environmental impacts of the FAA's actions of authorizing commercial package delivery operations using drones in the state of Kansas. Generally, these approvals are associated with issuing a new or amended Part 135 air carrier Operations Specifications as the operative approval. The FAA has determined that its proposed action, which would encompass all FAA approvals necessary to enable expanded operations, is an **undertaking** as defined under the regulations implementing Section 106 of the NHPA (36 CFR § 800.16(y)). The FAA intends to complete consultation for Section 106 of the NHPA concurrently with the NEPA process.

## **Confidentiality**

We understand that you may have concerns about the confidentiality of information on areas or resources of traditional, religious, and cultural importance to your Tribe. We are available to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

## **FAA Contact Information**

We anticipate that this letter will arrive by regular mail no later than July 28, 2025. Your timely response within 30 days of receipt of this letter will greatly assist us in incorporating your concerns into our environmental review of the operation. We respectfully request your response in the event that the Eastern Shawnee Tribe of Oklahoma would like to consult with the FAA in a government-to-government relationship about this proposal.

Please contact FAA via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov) with any questions or concerns.

Very respectfully,

Chris Hurst  
REM/CEA/CESCO

Environmental Protection Specialist

AFS-752

General Aviation and Commercial Branch

Emerging Technologies Division

Office of Safety Standards, Flight Standards Service

[christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)

CST

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**From:** [Hurst, Christopher A \(FAA\)](#)  
**To:** [Neal Wolfe](#)  
**Cc:** [Fitzpatrick, Jim](#)  
**Subject:** FW: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Kansas.  
**Date:** Monday, July 21, 2025 3:42:00 PM

---

Chris Hurst  
REM/CEA/CESCO  
Environmental Protection Specialist

AFS-752  
General Aviation and Commercial Branch  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service  
[christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)  
CST

---

**From:** thpo <thpo@mohican-nsn.gov>  
**Sent:** Monday, July 21, 2025 10:25 AM  
**To:** 9-FAA-Drone-Environmental (FAA) <9-FAA-Drone-Environmental@faa.gov>  
**Cc:** Hurst, Christopher A (FAA) <Christopher.A.Hurst@faa.gov>; DeLaune, Jonathan (FAA) <jonathan.delaune@faa.gov>; Jones, Jodi A-CTR (FAA) <jodi.a-ctr.jones@faa.gov>  
**Subject:** RE: FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Kansas.

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Dear Chris,

Thank you for the Invitation for Government-to-Government Tribal and National Historic Preservation Act Consultation for Drone Package Delivery Operations in Kansas.

The Stockbridge-Munsee Community Tribal Historic Preservation Office has no comment regarding the aforementioned action.

Regards,  
Jeff

Jeffrey C Bendremer Ph.D., RPA  
Tribal Historic Preservation Officer  
Stockbridge-Munsee Community

Tribal Historic Preservation Extension Office  
86 Spring St.  
Williamstown, MA 01267  
413-884-6029 (o)  
715-881-2254 (c)



[www.mohican.com](http://www.mohican.com)

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**From:** 9-FAA-Drone-Environmental (FAA) <[9-FAA-Drone-Environmental@faa.gov](mailto:9-FAA-Drone-Environmental@faa.gov)>  
**Sent:** Monday, July 14, 2025 2:46 PM  
**To:** Shannon Holsey <[Shannon.Holsey@mohican-nsn.gov](mailto:Shannon.Holsey@mohican-nsn.gov)>; thpo <[thpo@mohican-nsn.gov](mailto:thpo@mohican-nsn.gov)>  
**Cc:** Hurst, Christopher A (FAA) <[Christopher.A.Hurst@faa.gov](mailto:Christopher.A.Hurst@faa.gov)>; DeLaune, Jonathan (FAA) <[jonathan.deLaune@faa.gov](mailto:jonathan.deLaune@faa.gov)>; Jones, Jodi A-CTR (FAA) <[jodi.a-ctr.jones@faa.gov](mailto:jodi.a-ctr.jones@faa.gov)>  
**Subject:** FAA-Amazon Prime Air: Invitation for Government-to-Government Tribal and National Historic Preservation Act (NHPA) Section 106 Consultation(s) for Drone Package Delivery Operations in Kansas.

**CAUTION: This email originated from outside the organization.  
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*Consultation Package sent via Email and Regular Mail*

*Attachment – Government-to-Government consultation letter and National Historic Preservation Act (NHPA) Section 106 Consultation Package*

Good afternoon,

My name is Chris Hurst and I am an environmental specialist with the Federal Aviation Administration (FAA). The purpose of this email is to initiate formal government-to-government and National Historic Preservation Act (NHPA) Section 106 consultations regarding a proposal by Amazon Prime Air. The FAA is considering whether to authorize expanded commercial Unmanned Aircraft Systems (UAS) operations to deliver goods to customers (*referred to as package delivery*) using unmanned aircraft (*also referred to as drones*) in accordance with 14 Code of Federal Regulations Part 135 (Part 135) in the state of *Kansas*. The FAA is the lead federal agency for the proposed project. Amazon Prime Air is the project proponent. We wish to solicit your views regarding potential

effects on tribal interests in the area.

The primary purpose of government-to-government and NHPA Section 106 consultation is to ensure that Federally Recognized Tribes are given the opportunity to provide meaningful and timely input regarding proposed FAA actions that uniquely or significantly affect the Tribes.

### **Consultation Initiation**

With this consultation package (*attached and also transmitted via regular mail*), the FAA is seeking input concerning any Tribal lands or sites of religious or cultural significance that may be affected by the proposed operation. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources. We are available to discuss the details of the proposed project with you.

### **Proposed Activity**

Amazon Prime Air is working with the FAA to prepare an environmental assessment to assess the potential environmental impacts of the FAA's actions of authorizing commercial package delivery operations using drones in the state of Kansas. Generally, these approvals are associated with issuing a new or amended Part 135 air carrier Operations Specifications as the operative approval. The FAA has determined that its proposed action, which would encompass all FAA approvals necessary to enable expanded operations, is an **undertaking** as defined under the regulations implementing Section 106 of the NHPA (36 CFR § 800.16(y)). The FAA intends to complete consultation for Section 106 of the NHPA concurrently with the NEPA process.

### **Confidentiality**

We understand that you may have concerns about the confidentiality of information on areas or resources of traditional, religious, and cultural importance to your Tribe. We are available to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

### **FAA Contact Information**

We anticipate that this letter will arrive by regular mail no later than July 28, 2025. Your timely response within 30 days of receipt of this letter will greatly assist us in incorporating your concerns into our environmental review of the operation. We respectfully request your response in the event that the Stockbridge-Munsee Band of Mohican Indians would like to consult with the FAA in a government-to-government relationship about this proposal.

Please contact FAA via email at [9-faa-drone-environmental@faa.gov](mailto:9-faa-drone-environmental@faa.gov) with any questions

or concerns.

Very respectfully,

Chris Hurst  
REM/CEA/CESCO  
Environmental Protection Specialist

AFS-752  
General Aviation and Commercial Branch  
Emerging Technologies Division  
Office of Safety Standards, Flight Standards Service  
[christopher.a.hurst@FAA.gov](mailto:christopher.a.hurst@FAA.gov)

CST