



State of Connecticut
CONNECTICUT GENERAL ASSEMBLY
STATE CAPITOL
HARTFORD, CONNECTICUT 06106-1591

September 25, 2026

Emma Cimino
Acting Commissioner
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: Federal Consistency Review — Amazon Prime Air Drone Package Delivery Operations, North Haven, Connecticut

Dear Acting Commissioner Cimino,

We write with sincere concern regarding Amazon's proposed electric drone package delivery operations ("Prime Air") based in North Haven with services extending to East Haven and North Branford. It is our understanding that the Federal Aviation Administration (FAA) has submitted a request, pursuant to Section 307(c)(1) of the federal Coastal Zone Management Act, that the Department of Energy and Environmental Protection (DEEP) review this proposed action for consistency with the enforceable policies of Connecticut's federally approved Coastal Management Program, as set forth in the Connecticut Coastal Management Act, Conn. Gen. Stat. §§ 22a-90 through 22a-112. We respectfully submit these comments for the record and urge DEEP to find that the proposed operations, as currently described, are not consistent with the Act's enforceable policies.

Prime Air relies on a fleet of roughly 80-pound drones, each with six arms and multiple propellers, launched from a local distribution center with an operating radius of approximately 7.5 miles. The drones are designed to deliver packages up to roughly five pounds within 30 minutes of order placement. FAA guidance for this type of operation calls for cruise altitudes of roughly 225 to 400 feet above ground level. In communities where Prime Air has already launched, however, residents have documented — on video — drones flying as low as 150 feet, well below the represented operating range.

Prime Air has been operating in Richardson, Texas, a suburb whose experience was recently profiled in the New York Times because of the problems residents there have reported. Those complaints include near-constant drone traffic in the airspace above private residences; noise residents describe as more intrusive than a lawn mower and audible over television indoors; and a pattern of flights below the advertised altitude range. These are not speculative or theoretical harms — they are the documented, ongoing experience of a community with an operation materially identical to the one proposed for North Haven, and DEEP should weigh them accordingly.

The North Haven area supports a significant concentration of threatened and endangered bird species that depend on quiet, low-disturbance coastal habitat. Endangered species using this area include the Saltmarsh Sparrow, King Rail, and Short-eared Owl. Threatened species include the Great Egret, Bald Eagle, and Piping Plover. Osprey and hawks, while not listed, are also at risk from repeated incursions into their airspace and from the sustained noise associated with drone operations.

According to Audubon Connecticut, flying drones near nesting areas creates a serious problem for shorebirds because a drone is perceived as an avian predator. It triggers the same defensive response as a gull or falcon flying too close, prompting nesting birds to try to drive it off — except that, unlike another bird, a drone cannot be chased away.

Audubon Connecticut has also documented the real-world consequence of that dynamic. During the 2021 nesting season, a pair of nesting Piping Plovers and a pair of American Oystercatchers in Connecticut were subjected to repeated harassment from a drone before the problem could be resolved. The constant disturbance and perceived threat caused the plovers to abandon their nest entirely. The oystercatcher sustained a leg injury while chasing and dive-bombing the drone; it has since recovered and hatched chicks, but none of those chicks survived.

These are precisely the kinds of impacts the Coastal Management Act's enforceable policies are designed to prevent. The Act's legislative findings recognize Connecticut's coastal resources as an integrated, unique, and fragile natural ecosystem, Conn. Gen. Stat. § 22a-91(1), and its general policies direct that development and use of coastal resources proceed without significantly disrupting the natural environment, id. § 22a-92(a)(1). The Act specifically directs that beach and shorefront systems be managed to preserve their function as critical wildlife habitat and as feeding and refuge areas for shorebirds, id. § 22a-92(b)(2)(C), and it separately establishes a seabird and shorebird protection program, id. § 22a-111d. A drone delivery operation that repeatedly disturbs nesting shorebirds, triggers predator-avoidance responses, and has already caused documented nest abandonment and injury in Connecticut is difficult to reconcile with these enforceable policies.

We recognize that concerns about invasion of privacy, property damage, and personal injury fall outside the scope of a coastal consistency review, but we want them on the record. Residents in communities with active Prime Air service have raised all three, and we share those concerns even as we focus this comment on the coastal-resource impacts within DEEP's jurisdiction. Additionally, we have concerns regarding the potential job loss associated with this change.

We respectfully ask DEEP to find that the proposed Prime Air operation, as currently described, is not consistent with the enforceable policies of Connecticut's Coastal Management Program. At a minimum, before any consistency concurrence is granted, we ask that DEEP require Amazon and the FAA to:

- Identify and map all active nesting and foraging areas for Saltmarsh Sparrow, King Rail, Short-eared Owl, Piping Plover, Great Egret, and Bald Eagle within the proposed flight envelope, and establish enforceable no-fly buffers around them, with seasonal restrictions during nesting season;
- Demonstrate, with independent verification rather than self-reporting, that flights will reliably operate at or above the represented 225–400-foot altitude range, given documented sub-150-foot flights in other markets;

- Commit to independent noise monitoring and public reporting, with defined thresholds and consequences for exceedance; and
- Provide a monitoring and incident-reporting protocol for wildlife disturbance, injury, or nest abandonment attributable to drone operations, modeled on the 2021 Connecticut incident described above.

We appreciate DEEP's time and attention to this matter and urge the Department to take the action necessary to protect coastal wildlife that cannot advocate for itself, as well as the residents who will be directly affected by this operation.

Respectfully submitted,



Representative Vincent Candelora



Representative David Yaccarino



Representative Joe Zullo



Senator Christine Cohen



Senator Paul Cicarella