



The Commonwealth of Massachusetts

General Court

October 19, 2026

Her Excellency Maura T Healey
Governor of the Commonwealth
24 Beacon Street
Room 280
Boston, MA 02133

The Honorable Andrea Joy Campbell
Attorney General
1 Ashburton Place
20th Floor
Boston, MA 02108

The Honorable Kim Driscoll
Lieutenant Governor
Room 280
Boston, MA 02133

Dear Governor Healey, Lieutenant Governor Driscoll, and Attorney General Campbell:

As you know, Amazon has proposed to begin operating its Prime Air commercial drone delivery service out of the town of Westborough with the ability to reach all or portions of the surrounding cities and towns of: Ashland, Berlin, Boylston, Grafton, Hopkinton, Hudson, Marlborough, Millbury, Northborough, Shrewsbury, Southborough, Sutton, Upton, West Boylston, and Worcester.

To do so, Amazon plans to expand an existing package distribution center to now include commercial drone takeoff and landing capabilities. Amazon believes that they have the authority under zoning rules to make this change by right. The result is that communities in the proposed service area have suddenly found themselves opted into a new form of air commerce that will forever change the skies right above their homes and impact their lives. Our constituents have raised valid concerns related to noise, flight routes and frequency, operating hours, safety, privacy, drone cybersecurity, impacts on property values, and environmental impacts arising from commercial drone delivery operations. Massachusetts has joined several other states in challenging the adequacy of the Federal Aviation Administration's (FAA) evaluation of many of these concerns. We greatly appreciate this action and respectfully request that the Commonwealth continue to pursue all legal options to protect our constituents from the impacts of commercial drone delivery services.

Addressing these concerns at the outset is critical because while Amazon may be the first, it will not be the last. Other companies will follow Amazon's lead, either out of a desire to expand their delivery options or simply out of the necessity to remain competitive. Drone delivery will also not necessarily be limited to packages. DoorDash just received its own FAA Part 135 certification for

commercial drone delivery operations, with an eye toward deliveries that can include “a coffee or hot meal.”¹ Each operator will need one or more takeoff and landing sites of their own.

We respectfully request that you establish a task force to review the Commonwealth’s existing regulatory scheme related to commercial drone delivery operations, including the siting of the takeoff and landing locations, and charge this task force with making recommendations for regulatory updates as necessary and appropriate to address the arrival of commercial drone delivery services in Massachusetts. We further respectfully request that you implement a moratorium on any state agency accepting or processing any application for a certificate from any commercial drone delivery operator until that review and regulatory update is complete.

We have met with our federal delegation on this issue and greatly appreciate their efforts.² We also acknowledge that Congress and the FAA have control over the nation’s airspace and that these programs operate under a federal regulatory scheme. However, the FAA has made clear that states still retain control over certain ground operations – including the siting of takeoff and landing areas: “it is well established that States have a valid interest in choosing where aircraft may operate on the ground. Laws designating takeoff and landing locations have no direct effect on where [unmanned aircraft systems] may operate in the air.”³ The Commonwealth should exercise its valid state interest and first plan out takeoff and landing locations rather than merely approve them on an ad hoc basis. This is especially important given that companies like Amazon are simply upgrading their existing ground distribution sites into ground and air distribution sites – a maneuver that deprives the state of any form of comprehensive planning or say over the location of commercial drone takeoff and landing sites.

In addition, there are substantial zoning issues that need to be addressed at the local level, including whether adding commercial drone delivery capabilities to an existing ground distribution site qualifies as an accessory use. Another critical issue is that while Amazon is proposing to operate out of the town of Westborough, all communities within the proposed delivery range will be impacted by the arrival of this commercial drone delivery service. Current zoning law does not properly account for the interests of our local communities. Addressing this issue requires a thoughtful approach, and a full stakeholder engagement process.

Consideration of our existing health care and public safety facilities provides another reason why prior planning by the state is necessary. These existing facilities often have takeoff and landing sites of their own. The introduction of new takeoff and landing sites based merely on where an existing ground distribution center is located does not account for nearby health care and public safety facilities.

The Commonwealth is facing the introduction of an entirely new form of commerce in our skies. While the FAA may control the air elements, the state still has important interests on the ground, including properly planning for the expected new takeoff and landing sites that will be needed by

¹ [DoorDash Is Cleared for Takeoff: Launches DoorDash Air, Our In-House Drone Delivery Program | DoorDash](#)

² [Fed officials urge Amazon, FAA to reconsider Westborough drone delivery](#)

³ [State-Local-Regulation-of-Unmanned-Aircraft-Systems-Fact-Sheet.pdf](#)

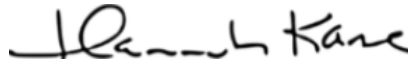
commercial drone delivery operations. This review and planning should be done prior to the Commonwealth accepting or processing an application for a certificate by a commercial drone delivery operator. Doing so treats all commercial drone delivery operators equally and ensures the best outcome for the public.

Thank you for your consideration.

Sincerely,



Senator Michael O. Moore
Second Worcester District



Representative Hannah Kane
11th Worcester District



Representative Kate Donaghue
19th Worcester District



Senator Robyn K. Kennedy
First Worcester District



Senator James B. Eldridge
Middlesex & Worcester District



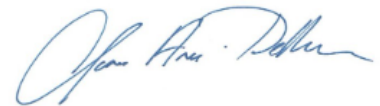
Senator Ryan Fattman
Worcester and Hampden District



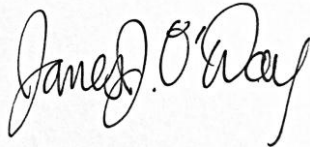
Senator Peter J. Durant
Worcester and Hampshire District



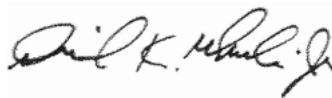
Representative Meghan Kilcoyne
12th Worcester District



Representative James Arena-DeRosa
8th Middlesex District



Representative James J. O'Day
14th Worcester District



Representative David Muradian Jr.
9th Worcester District



Representative Carmine L. Gentile
13th Middlesex District



Representative Daniel Donahue
16th Worcester District



Representative Joseph McKenna
18th Worcester District



Representative Paul Frost
7th Worcester District



Representative David LeBoeuf
17th Worcester District

cc: Massachusetts Department of Transportation